

RENT-GEARED-TO-INCOME



# SPECIAL PRIORITY POLICY XR

POLICY OPTION CONSIDERATIONS FOR AN  
EXTENSION OF THE SPECIAL PRIORITY HOUSING  
POLICY IN ONTARIO

NOVEMBER 4, 2024

BY LEAH DYCK

# Special Priority Policy XR (Extended Release) Designation

Created November 2024 | Version 1.0

## Preface

The contents of this document were written by Leah Dyck, a resident of a public housing project since 2009. Therefore, the contents of this document were written by an individual with 15 years of Lived Experience.

Additionally, some of you may be wondering, “who do you expect to pay for this?” I can assure you, that five to 15 years (depending on the participant’s age when they enter the program) is hundreds of thousands of dollars cheaper than an entire lifetime. I just saw how much money the Ontario Disability Support Program (ODSP) has given me since 2015. They’ve given me **\$79,000.00**. If I was allowed to work a job that paid me enough to survive when I finished College in 2014, I would never have needed to go on ODSP in the first place. And if you’re wondering if I was capable of contributing to the economy in a meaningful way, you shouldn’t wonder anymore. Between July 2022 and March 2024, I personally raised +\$195,000.00 for my registered charity, The VanDyck Foundation. I accomplished this because I’m extremely capable.

People who’ve endured domestic abuse or trafficking have a disadvantage in society. People with a disability are prone to chronic abuse simply because their disability makes them different. Disabilities can be of an intellectual, physical, sensory, emotional, or behavioural nature, or be a learning disability or produce exceptional gifts or talents within the “disabled” individual.

People who’ve experienced abuse or victimization can be discriminated against because of their differences, despite these differences not being visually obvious at first glance. Being different can make disabled people easy targets of abuse simply because they’re different. Being an easy target of abuse can garner chronic abuse, which compounds to create new problems within the abused individual, as well as exacerbate pre-existing problems they already had. This results in a whole slew of vulnerabilities and thereby perpetuates the cycle of abuse even further.

I founded the Fresh Food Weekly food security program and as I've previously mentioned, I personally raised +\$195K in donations in 19 months. This means I was able to raise a little over \$10K each month for 19 consecutive months. Yet I'm unable to find employment that will pay me enough to survive. Apparently, I'm a gifted person that no one can tolerate. As a result, I cannot participate in society and this has cost the Ontario Ministry of Children, Community and Social Services **\$79K** and counting so far. I can only imagine how much the Ontario Ministry of Municipal Affairs and Housing has spent on my living accommodations on top of this. It's definitely **+\$79K**, though. On top of this, the Ontario Repayment Assistance Program (RAP) will have paid-off my entire student debt of **+\$50K** by January 2025. This doesn't include my OHIP Costs either. And yes, I've been desperately trying for over a decade to earn a living but it's just not happening. To make matters even worse, I'm blamed for living-off the government even though its everyone else who discriminates against me.

## I. Introduction

The Special Priority Policy is a housing category. Under the *Housing Services Act, 2011*, the Special Priority Policy gives eligible survivors of abuse and trafficking priority access to rent-geared-to-income (RGI) assistance. This is intended to ensure that housing is not a barrier to leave a situation of abuse or trafficking. [Source](#). The pre-existing eligibility criteria already established for the regular Special Priority Policy doesn't need to be changed, as it works well.

Specific Ministry criteria and documentation requirements need to be established for the "special priority status XR" designation. The Special Priority Policy XR shall be an extension of the Special Priority Policy and the eligibility criteria requirements should remain the same. The Special Priority Policy XR designation would begin once a person with regular Special Priority Status applies for the XR designation, which can happen at any time after they've received Special Priority Status, and have had their application processed successfully.

The purpose of the "special priority policy XR" ministry designation is not to label a participant, but rather to ensure additional resources and support arrangements are made available to meet the participant's needs.

The Special Priority Policy XR program shall require participants to enrol and meet target objectives to maintain their enrolment in the program. This special program encompasses specific criteria and documentation requirements that must be met at each milestone of the program in order to maintain designation as a person with Special Priority Status XR.

## Information Sharing Agreements

Information Sharing Agreements (ISA) are imperative for the wellbeing of populations, as they provide the data needed to measure and track health outcomes based on socio-economic indicators. Below, I've copied and pasted snippets of the Ontario Housing Services Act, 2011, regarding important objects that housing provider corporations should do in order to become aware of the social and health outcomes their housing and homelessness plans are either achieving or not achieving.

### **Housing Services Act, 2011, S.O. 2011, c. 6, Sched. 1** Continuation, Objects, Powers, etc.

#### **Objects**

**122** The objects of the Corporation are the following:

**3.** To improve the quality of life of residents in housing for moderate and low-income households.

#### **Required activities**

**124** The Corporation shall,

**(d)** undertake research and provide advice to the Province of Ontario, service managers and housing providers with respect to the establishment and use of performance measures and good practices to achieve the efficient and effective provision and long-term sustainability and viability of housing for moderate and low-income households; and

**(e)** undertake such other activities as are prescribed. 2011, c. 6, Sched. 1, s. 124.

#### **Agreements of Minister re information**

**171 (1)** The Minister may enter into an agreement with respect to the collection, use and disclosure of information with the following:

**6.** Such other bodies as may be prescribed. 2011, c. 6, Sched. 1, s. 171 (1).

## **Disclosure of personal information**

**(2)** The Minister may disclose personal information collected for the purpose of administering or enforcing this Act and the regulations to a party to an agreement under subsection (1) if,

**(b)** the party administers, enforces or is conducting research relating to,

(i) a social benefit program,

(ii) a social housing or rent-geared-to-income assistance program,

**(c)** the party agrees to use the information only for the administration, enforcement or research described in clause (b). 2011, c. 6, Sched. 1, s. 171 (2).

## Agreements of service managers re information

**172 (1)** A service manager may enter into an agreement with an entity referred to in subsection 171 (1) with respect to the collection, use and disclosure of information. 2011, c. 6, Sched. 1, s. 172 (1).

## Disclosure of personal information

**(2)** The service manager may disclose personal information collected for the purpose of administering or enforcing this Act and the regulations to a party to an agreement under subsection (1) if,

**(b)** the party administers, enforces or is conducting research relating to,

(i) a social benefit program,

(ii) a social housing or rent-geared-to-income assistance program,

**(c)** the party agrees to use the information only for the administration, enforcement or research described in clause (b). 2011, c. 6, Sched. 1, s. 172 (2).

## **Collection of personal information**

**(3)** The service manager may collect personal information from a party to an agreement under subsection (1) if the collection is made in accordance with the agreement. 2011, c. 6, Sched. 1, s. 172 (3).

## **Protection of information**

**(2)** In relation to the personal information collected, used or disclosed under it, an agreement must,

**(a)** provide that the information is confidential;

**(b)** establish mechanisms for maintaining the confidentiality and security of the information; and

## **Sharing information**

**174 (1)** The Minister, the Housing Services Corporation, each service manager, each delegate under section 17, each housing provider and each person or organization providing services by contract to any of them may share personal information with each other or with the other persons specified in subsection (2) if,

**(b)** the information is necessary for the purposes of making decisions or verifying eligibility for assistance under this Act or the other Acts referred to in clause (a). 2011, c. 6, Sched. 1, s. 174 (1); 2014, c. 11, Sched. 6, s. 4 (1); 2020, c. 16, Sched. 3, s. 10 (6).

## **II. Define the Target Group**

The target group is low-income women with Special Priority Status, who are not married and who do not live with a common law partner, and who do or do not have children, and who have a disability, (mental, intellectual or physical) that is either diagnosed or not diagnosed. There shall also be a greater priority for Indigenous women, with or without Indigenous status. For every four program participants of any ethnic heritage, one shall be reserved for women of Indigenous heritage.

### III. Method of Identification

The method of identification used for determining eligibility to participate in the special program shall be defined under the current Special Priority Policy, as an extension of it. In order to start meeting the current Special Priority Policy objectives in the County of Simcoe, the Service Area needs to transfer all of its RGI units designated for Special Priority Status tenants to a new Service Area. The new Service Area, shall be a Service Manager who holds the requisite education, training and skills needed to manage the housing services needs of abused RGI tenants with the Special Priority Status XR designation. The purpose of this extended policy is to ensure the objectives of the Special Priority Policy are upheld. Occupancy Standards and housing services procedures shall further advance the Special Priority Policy's objectives.

### IV. Analysis of the Disadvantaged Status

In order to determine if this special program will meet the goals of prevention, reduction or elimination of disadvantages of a target group, data will be required. The Ontario Human Rights Commission will use this data to determine the nature and degree of the disadvantaged status of the target group. Data on socio-economic indicators include;

- unemployment rates,
- labour force participation rates,
- occupational representation,
- levels of income,
- education levels, and
- other relevant data which demonstrates the disadvantages of the group,

This information would be the information collected, used and shared in the Information Sharing Agreements (ISA). Other relevant data that demonstrates the disadvantages of the group are health and healthcare costs, which would also be included in the data collected in the ISAs.

## V. Determine Policy Options

This section provides recommended policy options for the proposed new housing category:

### General Public Housing Services Policy Options

Men-free properties as an available option for women who request it.

A policy procedure for transferring families to households that reflect the appropriate number of bedrooms-to-household-members.

When the primary leaseholder reaches the age of 65, they shall be transferred to a seniors project, which will have upgraded amenities, such as a walk-in bathtub.

Households shall have a fridge-size that accurately reflects the number of people (bedrooms) in the household. In addition to having a fridge, each subsidized unit shall also have a chest freezer that also accurately reflects the number of people residing in the household.

Each unit will have its own washing machine and area for drying clothes within their household:

- A shared 'dryer-mat' room shall also be on the ground level of the project.

### Healthcare Housing Services Policy Options Overview

The Fresh Food Weekly program operated in Barrie and Innisfil, Ontario between 2021 and 2024. This program delivered fresh and nutritious food to the front door steps of the same program recipients on a weekly, biweekly or monthly basis depending on the year; 2021 was weekly, 2022 was monthly and 2023 was biweekly. In 2022, we started requiring proof of income and this allowed us to see people's income source.

If you're not familiar with social assistance benefits, if you have a disability, you can receive a disability income benefit. You can only receive a disability income benefit if you have a diagnosed disability. You can also only have a diagnosed disability if you have a family physician. Additionally, sometimes you can have a disability and not even know it. It's especially easy to have an undiagnosed disability if it's not obvious, such as, autism that ranks low on the spectrum.



When new program recipients signed-up for the Fresh Food Weekly program, sometimes a person would reach-out to sign up their family member. Most commonly, though, people would sign themselves up for the program. If someone had a diagnosis for autism, they would sometimes tell me that they or their family member had autism. Since we required proof of income, these recipients would provide their disability income statements. This revealed if their autism was diagnosed since they could not receive disability benefits without a diagnosis. Over time, I began to observe behavioural differences among program recipients who self-identified (or a family member-identified) as having autism. Some behaviours I observed of program recipients with autism were:

- They filled-out each food order form as soon as they received it. They never missed filling-out a single form and they always filled them out immediately after receiving it (filling out forms immediately does not mean you have autism).
- If the month's food order forms were not provided on the first day of the month like usual (sometimes I was late), I'd receive emails from them asking for the month's food order forms. They were always on top of their needs as they related to the program's benefits.
- They were extremely worried about missing their food delivery. For each delivery day, I'd email each participant with an estimated two-hour delivery time frame. However, sometimes traffic would be bad, or there was bad weather, or a volunteer driver had to stay at work a little bit longer than expected, etc. When their food delivery didn't arrive exactly within the estimated timeframe of delivery, they'd start emailing me or texting me or calling me every two minutes asking where their food was. They were in "survival mode" and I understood that. Although this was irritating, I understand why they were doing it. Their intention was not to be rude, even though it could appear that way if their true motivations for behaving like this were not understood.

I observed that program recipients with autism are very good at following a schedule. I also observed a handful of program participants who did not have a disability diagnosis' because they were not in receipt of a disability benefit, yet they demonstrated these same behavioural patterns. I'm not a doctor, nor would I mention my observations to these individuals in case I am wrong. However, if a doctor observed these behaviours, a doctor may see it appropriate to recommend testing for autism, and they would be able to make this recommendation in an appropriate way.

## Healthcare Housing Services Policy Options

A registered nurse practitioner, or a doctor, with specialized trauma training and education should be the only person allowed to manage public housing projects. The biggest reason for this policy option is that it allows housing managers to provide the written medical portion for their tenant's Ontario Disability Support Program (ODSP), the Canada Pension Plan (CPP) Disability applications, or any other disability benefit program. The second purpose for this policy option is that it provides the opportunity for unknown disabilities to become known through the process of "getting to know" tenants.

Each RGI unit shall have air-conditioning. The purpose of this policy is to reduce the amount of premature deaths of RGI tenants. It would also decrease a significant amount of healthcare costs by avoiding heat-related illnesses altogether.

The provision of internet access for each RGI unit. The intention of this policy is to ensure that all tenants have the ability to communicate to "the outside world" and therefore access essential healthcare and social services within the community. This policy option would also allow participants to participate in the economy, since participating in the economy is essential to earn an income.

Sheltered refrigerated mailbox clusters shall be mandated for all RGI housing projects within the Special Priority Policy XR housing category. The purpose of this policy is to ensure the basic human needs of being fed are met, as it's not possible for participants to consistently participate in the economy if their basic human needs are not consistently being met.

## Environmental Housing Services Policy Options

Infrastructure designs that reduce the energy required to both heat and cool households.

Households shall have bidet toilets to eliminate the use of toilet paper, which significantly reduces the amount of water usage when nature calls.

A water drainage service board shall be mandated to work with RGI housing [and agriculture] projects. The proposed water drainage service board shall also work in conjunction with the food systems planning office to ensure the most efficient use of water-use practices are applied.

## Toilet Paper & Water-Use Efficiencies

Ronalds Gonzalez is a professor at North Carolina State University and co-director of its Sustainable and Alternative Fiber Initiative. According to Gonzalez, the supply of recycled paper materials has fallen as the use of certain paper products has declined. Between 2014 and 2022, the production of printer and writing paper in the United States declined by nearly 50 percent, according to data from the United Nations Food and Agriculture Organization.

Bamboo toilet paper shows promise as an alternative to tree-based products, because it's a grass and not a tree. Bamboo grows faster and occupies less land. According to Ashley Jordan, an analyst at the Natural Resources Defense Council who has studied the environmental effects of toilet paper, converting bamboo fibers to paper also requires less water than virgin wood.

Dr. Gonzalez says that while bamboo itself may be a more sustainable material, it's also important to consider its origin. Much of the bamboo toilet paper currently on the market in the United States comes from China. An unpublished analysis by his group suggests that the carbon footprint of bamboo paper from China may be higher than tree-based toilet paper from North America because of the fossil fuels used to produce the product and ship it to market.

So the obvious question is, how much water consumption do bidet toilets consume? According to Jordan, bidets are absolutely the way to go. That's because the process of making toilet paper uses more water than most people realize. While toilet paper manufacturers don't provide exact numbers, the Environmental Paper Network calculator estimates it takes about six gallons of water to produce one double roll of toilet paper. The number of sheets in a roll of toilet paper varies by brand. But, if you estimate 200 sheets per double roll, and eight sheets per wipe, each bathroom trip represents about a quarter of a gallon of water. Bidets are estimated to use between one-sixth and one-quarter of a gallon per spray. And, you'll avoid all the cascading side effects of agroforestry and pulping.

Procter & Gamble, which makes Charmin, and Kimberly-Clark, which owns Scott, did not respond to requests for comment. [Source.](#)

## Food Systems Planning Services Policy Options

The creation of new legislation; ‘The Ontario Food Systems Planning Act’. The purpose of this legislation is to address population-wide household food insecurity by defending a municipality’s worsening economy and increasing occurrences of natural disaster events.

The establishment of a Food Systems Planning Office should be housed in The Mayor’s Office of upper-tier cities in Ontario. This is how New York City housed their Office of Urban Agriculture, which was established under ex Mayor Mike Bloomberg.

A Food Systems Planning Office Advisory Board shall accompany the Food Systems Planning Office (FSPO).

- A FSPO shall house the primary business operations of a municipality’s food systems plans, including long-term easements for protecting owned agricultural sites.

The FSPO shall obtain a Minister’s Zoning Order (MZO) at its initial conception, in order to bypass city-occupied individuals who’ve already achieved household food security and do not believe the current level of population-wide household food insecurity requires an issuance of an emergency declaration. In the City of Barrie alone, +30,000 residents are severely food insecure.

Municipality’s shall cultivate the foodsheds they exist in so the whole population can eat. Foodsheds shall be mapped and measured for their production capabilities, including their current ability to supply the municipality’s population’s fresh food demand, as well as their future ability with added investments. The main purpose of this policy is to significantly decrease healthcare costs.

- Population food security objectives shall include research and innovation to increase the shelf-life of light-density crops that last for seven days.
- Due to the unique location of the County of Simcoe, this upper-tier municipality has the opportunity to be “the gatekeeper” to the north, in terms of the modes of freight transportation that has the potential to be made available.

Cultivation areas need to be mapped, including building and land structures that currently stand, and are expected to stand. Water resources shall consider methods to manage anticipated weather disasters such as mass flooding and heat-wave events. Furthermore, water management plans shall include water-capture systems that store water well into long, hot drought periods.

Resources shall be invested in autonomous agri-food innovations and industry modernizations to protect crop yields from natural disaster events, which are increasing in the County of Simcoe's service area, and are anticipated to worsen and continue worsening in the future. There is a great interest in this among researchers province-wide.

The FSPO shall house a Food Dispensary; this is where some cultivated foods of the municipality's foodshed will be brought to in bulk for processing and packaging.

- o The FSPO shall adhere to a nationally recognized vitamin and mineral standard, which shall be an approved standard of vitamins and minerals in foods produced within the Foodshed.

## NAV CANADA's Involvement

NAV CANADA assesses all land use proposals near airports and air navigation infrastructure before construction begins to ensure that safety and efficiency is not compromised. Some development uses may not be permitted even if other permits have been obtained. Therefore, the FSPO will need to contact Stakeholder and Commercial Relations or the Land Use Office according to the type of project as soon as conceptualization begins. Consulting with the Land Use Office often reveals issues that need to be addressed. Aviation-specific regulations, operational, and safety standards may significantly impact a project. Source.

## V. Special Program Sections

### Basic Human Needs Equity Plan Overview

The basic human needs equity plan shall ensure the basic human needs of program participants are being met. This means measures involving the provision of housing and food services is mandatory. It is impossible to perform in the workforce when a person's basic human needs are not met. This is also why the Occupancy Standards of housing projects in the County of Simcoe need to be completely overhauled; current RGI households do not have access to amenities required to meet its occupant's basic human needs.

## Education & Training Equity Plan Overview

The education and training equity plan shall ensure the educational and training needs of program participants are being met. This includes a behavioural sciences program to be administered to participants with parental or custodial care over children with autism and/or other neuro-developmental diagnosis’.

Additional investments shall be made for training and development of in-demand jobs and skill-sets. The purpose of this policy is to assist program participants in entering the workforce and in obtaining meaningful, long-term employment after education and training has been completed.

Each participant’s level of education, coupled with their educational goals shall determine the duration of each participant’s enrolment. For example, a woman who enters the program at age 18 does not have any post-secondary education, and will need to go to school to become educated in the field she wants to work in. Additional testing shall be made available before enrolment has commenced, to ensure appropriate education and job training aspirations are achievable, as some participants may be more capable than they appear due to severe material deprivation forced upon them, and/or due to other previous abusive living circumstances such as trafficking.

## Employment Equity Plan Overview

Employment preferences policies for the target group are a type of special program designed to eliminate the disadvantage experienced by vulnerable women. Vulnerable women include First Nations (status and non-status), Métis and Inuit women, low-income single women, and women of a visible minority.

The ongoing legacy of colonialism affects countless aspects of life throughout Canada, and employment is no exception. Vulnerable women face barriers in hiring and, when they are employed, can experience prejudice in many different forms which makes the workplace intolerable. As such, vulnerable women are underrepresented in many organizations across the country. By adopting a special program or special measure, a municipality can increase employment opportunities for low-income vulnerable women and help bridge the representation gap.

Vulnerable women employment preferences policies provide employment-related advantages like preferential hiring or access to training programs. Municipalities do not need to prove vulnerable women are disadvantaged in order to apply a preferential employment policy -- a vulnerable women employment preferences policy automatically meets most of the criteria for a special measure, as it is widely understood that vulnerable women face ongoing systemic discrimination.

The employment equity plan shall ensure program participants are accommodated with flexibility in the workplace. Participants shall be paired with a seasoned mentor in the field in which they're employed. Each job position shall have a 'set path to advancement', derived from each participant's goals and desired advancement outcomes they've set for themselves.

In cases where more than one participant has their sights set on the same goal and only one participant can hold the desired position, a competitive process will be established to gain and maintain the desired position. Furthermore, alternative goal options shall also be stated. Performance metrics shall determine the successful candidate, rather than the discriminatory preferences of the employer. Strengths and weaknesses shall be tested to maximize positive performance outcomes, and assist participants in advancing within their workplace's employment rankings (promotion).

### Home Ownership Equity Plan Overview

The home ownership equity plan shall ensure program participants eventually move out of RGI housing and into their own home after they've successfully completed the special program. There are several purposes to this policy, but one of the main purposes is to ensure that new spots become available to new participants once previous participants have successfully completed this special program. It is not an efficient use of resources to build new RGI households and have the same families reside in them indefinitely. The goal of this program is to establish a reliable opportunity for low-income single women to become self-sufficient in the County of Simcoe.

In order to achieve home-ownership, a percentage of each program participant's earned income (money obtained through working) shall be held in an interest-gaining trust account, with strict rules prohibiting funds from being extracted until all contractual obligations have been fulfilled.

A community partnership would need to be established between the special program, and an organization like Habitat for Humanity, as well as a major bank such as the RBC. This partnership program shall establish the conditions required for home-ownership to be obtained by each participant and the agreed upon terms. Some of the terms for this agreement include:

- The participant shall retain employment by the same employer for a minimum of three years unless a better option becomes available and both the employer and the employee agree to it.
- The performance metrics of the employment equity plan are being upheld to a satisfactory level.
- An agreed upon percentage of the participant's earned income shall be automatically deducted from each pay-period and deposited into a trust account. Please note, this agreed upon amount is a fixed amount that allows all parties to forecast the total amount of monies available for a downpayment that is required to purchase a home.
- If the participant chooses to leave the special program before completion, or if they do not meet the necessary milestone objectives within the timeframe allotted, they will not retain any of the funds they've accumulated in the trust. The purpose of this policy is to help motivate the participant to maintain their course of action in achieving their own personal goals they've set for themselves.

## VI. Conclusion

The proposed special program called 'The Special Priority Policy XR' isn't about "wasting more money" on people who don't deserve it. On the contrary, this proposed program will undoubtedly reduce the amount of government spending being wasted on oppressing a population group that is highly capable. I believe the target group doesn't have equal opportunities to access survivable employment due to severe discrimination, and that this may lead some women with autism or other similar neuro-developmental disorders to perceive having more children as their sole means of surviving, due to the social assistance increases that come with each additional dependent.

I believe that if abused women were given an opportunity to heal, work and earn a true living wage instead of having more children with potential neuro-developmental conditions that costs the Province of Ontario hundreds of thousands of dollars, per child, not only will the County of Simcoe's growing homelessness and trafficking problem decrease, our economic production will increase.





# SOCIAL JUSTICE ADVOCATE

LEAH DYCK

THE VANDYCK FOUNDATION

REGISTERED CHARITABLE STATUS NO. 77364 5148 RR0001

[WWW.FRESHFOODWEEKLY.COM](http://WWW.FRESHFOODWEEKLY.COM)