

Comox Valley Regional District

Homelessness and Supports Service Review

Implementation and Emergency Shelter Service Review

Final Report – September 6, 2023

Prepared By:



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1.0 Background

Vink Consulting was retained by the CVRD to support the CVRD and the Comox Valley Coalition to End Homelessness (Coalition) in conducting limited review of the Homelessness Supports Service (HSS) and a review of the Emergency Shelter Service (ESS) and support the implementation of select recommendations from the previous review of the Homelessness Support Service.

The scope of work included:

- Engagement with Coalition members to discuss status of the implementation of recommendations from the HSS previous review, challenges in acquiring land and getting projects to shovel-ready stage, opportunities to refine both Services, and how they would like to implement recommendations from the previous review
- Facilitation of a meeting with municipalities to learn about what they have been doing, their land assets and their interest in a community plan and land development plan and land purchased through ESS.
- A review of both the HSS and ESS and identification of areas for changes, including the most effective ways to get to shovel-ready projects and facilitate the creation of affordable/supportive housing/emergency shelter and roles for the CVRD.
- Identification of opportunities to incorporate relevant policies related to HSS and ESS into the Regional Growth Strategy.
- Support with implementing some of the recommendations from the previous HSS review, including development of an evaluation framework to support funding allocations.

2.0 Overview of HSS and ESS

2.1 Homeless Support Service

The Homeless Support Service was established in 2016 to provide funds to one or more local non-governmental organizations based on a board approved five-year action plan to address homelessness in the CVRD. The Service includes the City of Courtenay, the Village of Cumberland, Vancouver Island portion of Baynes Sound – Denman / Hornby Islands (Electoral Area A), Lazo North (Electoral Area B) and Puntledge – Black Creek (Electoral Area C). The Town of Comox opted not to participate in the service and provides funds on its own accord to service providers.

The Service's main revenue source is tax requisition. The maximum amount that may be requisitioned annually for the cost of this service is the greater of \$165,000 or \$0.02 per \$1,000 applied to the net taxable value of land and improvements for regional hospital district purposes. Based on assessment values the maximum requisition was \$350,000 in 2022. Additional revenue can also be raised through grant funding and community amenity contributions.

The HSS was reviewed by Vink Consulting in late 2020/early 2021.



The CVRD has a board approved Service Delivery Policy that provides the framework for delivering the Homeless Support Service. The policy has meant that the CVRD's role in delivering the Homeless Support Service was a fiscal host. The policy outlines that:

1. Annually, the Coalition will work with local non-governmental organizations to develop a five-year action plan to address homelessness in the Comox Valley (It should be noted that at some point the Coalition made the decision to develop a one year action plan rather than a five-year plan);
2. The CVRD may approve the current-year funding request established in the five-year plan
3. The Coalition may identify a need to set aside funds for future activity
4. The CVRD board may provide input on strategic goals that the board identifies as important elements for addressing homelessness
5. The recipient organizations will report at least annually to the Coalition and the board on the outcome of the actions funded by the service

The policy also includes provisions should the Coalition disband or otherwise cease to operate or exist. In such a case, the CVRD board:

- May direct funding on its own accord
- Will seek a community-based organization or group of organizations to continue developing a five-year action plan to address homelessness in the Comox Valley
- Update the service delivery policy to reflect the transition from the Coalition to a new coordinating body.

The full Service Delivery Policy has been provided as Appendix 1.

Since the review in 2021, the CVRD has been providing funding for the Coalition's Coordinator position to support the delivery of HSS. The CVRD board report approving the funding states that the role of the coordinator in delivering HSS includes:

- Facilitation of the Coalition's activities, including supporting the Leadership Team to liaise with agencies to identify proposed housing projects; identifying, collecting and summarizing data; researching information on housing and homelessness; and tracking information for evaluation of strategies;
- Supporting a coordinated response to homelessness, including supporting the Homelessness Response Team to enhance responses and case planning between social service agencies; and liaising with social service agencies, Island Health, RCMP, municipal staff, BC Housing, provincial ministries, the local business community and neighbourhoods impacted by homelessness; and
- Community Engagement, including production of promotional material; coordinating education and outreach efforts with the Coalition's Public Awareness Committee; working with peers to ensure inclusion in work of Coalition; and maintaining the Coalition's webpage and social media accounts.

The Coalition relies on the funding as one of its core sources of funding for Coalition activities.

2.2 Emergency Shelter Service

The Emergency Shelter Service (ESS) was established to acquire land for emergency shelter and supportive housing. The Service covers all of the Comox Valley Regional District. The City of Courtenay, the Town of Comox, the Village of Cumberland, Electoral Area 'A' (Baynes Sound – Denman / Hornby Islands), Electoral Area 'B' (Lazo North) and Electoral Area 'C' (Puntledge – Black Creek) are all participating areas. Tax requisition is the main source of funding, but additional revenue could be received by other means or received by way of agreement, gift or grant.

Shortly after its establishment in 2009, ESS was used to make a land acquisition for supportive housing. Following this purchase, the service has been relatively “dormant”. In 2022, it was revived to start building a reserve and to do this review. The ESS establishment bylaw requires a service review every five years. The current review is the first review.

3.0 Status of Recommendations from Previous Review of HSS

The review of HSS in 2021 identified 14 recommendations. A full list of recommendations from the review along with their status has been provided in Appendix 2. Some of the simpler recommendations have been implemented, including:

- Increasing the maximum funding that is provided for pre-development planning costs from \$5,000 to \$10,000, and
- Establishing an evaluation committee with time-limited participation to support the evaluation of applications.

The pursuit of funding from other sources to support a Coordinated Access system is ongoing.

A number of the main recommendations have not yet been implemented:

- The Coalition has developed a mechanism to engage with individuals with a lived/living experience of homelessness, but individuals with lived/living experience have not participated in the Service.
- The Coalition and CVRD have not yet partnered in the preparation of a homelessness needs assessment and community plan to address homelessness that is based on best practices
- The Coalition has not yet made changes to the funding allocation process to prioritize funding allocations based on best practice for investments aimed at addressing homelessness
- The Coalition has not yet updated the Request for Expressions of Interest to collect additional information to support additional evaluation of applications.

As part of the current review, the Coalition was consulted about how they would implement the outstanding recommendations. A summary of the feedback from the Coalition has been provided in Appendix 3.



4.0 Key Findings and Recommendations from the Current Review

During the pandemic and since the review of HSS in early 2021 the landscape related to housing and homelessness has changed. There has been an increase in the number of individuals and families experiencing homelessness in Comox Valley and a growing shortage in affordable rental housing. This has contributed to increased public awareness and pressure to respond to gaps in housing and services for people experiencing homelessness. Local municipalities have identified the need for additional supportive housing for people experiencing homelessness and the need for a purpose-built shelter. The funding landscape for affordable housing development has also changed. There are greater expectations for developments to be “shovel ready” when seeking capital funding and project proposal timelines are increasingly limited.

The Coalition to End Homelessness has been responsible for a significant role in implementing HSS, and despite efforts by the CVRD and Coalition to use the HSS to increase housing and supports, challenges and gaps remain:

- The community does not have a clear plan to address homelessness.
- There are a limited number of community agencies involved in affordable/supportive housing development, and greater involvement and larger projects are needed to address demands.
- Land is required to access senior government funding for affordable housing, but there is lack of clarity regarding available land across Comox Valley.
- Agencies applying for HSS funding are not targeting people experiencing homelessness in their affordable housing developments.
- HSS funds are not necessarily being prioritized for maximum impact or strategic development opportunities, including initiatives that demonstrate ability to leverage additional funding.
- HSS funding allocated in one year is sometimes not spent for several years.
- The community has not begun the process of implementing a Coordinated Access process to housing, which is recognized as a best practice to reducing homelessness, and would provide the community with information needed for planning and advocacy efforts.
- Conversations between homelessness funders are not involving all relevant parties to strategically discuss and obtain support for community priorities in addressing homelessness.
- There are limitations in the Coalition’s capacity to strategically plan to address homelessness and support the community in affordable housing pre-development activities such as identifying project partners and assisting in securing sources of funding or financing, and developing financially viable housing concepts. The board should not expect all of this out of the part-time Coalition coordinator role it funds to provide management and administration of HSS.
- During the current review, the Coalition has been in a period of transition. There have been resignations from the Coalition leadership group and the agency who had been acting as the flow-through agency for the CVRD funds for the coordinator position to support management and administration of HSS has provided notice that they no longer intend to act in this capacity.



Local municipalities have varying levels of involvement in affordable and supportive housing and emergency shelter. They are at various stages in their exploration of the potential to use municipally owned land for supportive or affordable housing. In general, local municipal staff indicated that they think there would be a benefit from regional initiatives to help move forward. Some municipalities indicated that they would benefit from having a better understanding of the needs, what spectrum of housing would be most suitable in their community and identifying targets to address needs. Others indicated that they don't just need targets, but need assistance with tools and resources to hit the targets. In general, municipalities indicated that a regional affordable and supportive housing land infrastructure plan would be beneficial and Regional District support with land acquisition expertise and getting potential developments to the stage where they would likely receive BC Housing funding would be welcomed, including identifying land, conducting due diligence activities on the land, determining conceptual designs, developing a request for expressions of interest to develop supportive or affordable housing development, determining appropriate partners, and supporting partners to make prepare for and make proposals to BC Housing for funding.

Given the identified challenges and local municipal needs, it is recommended that the Board consider opportunities to increase its effectiveness in addressing homelessness.

Foundational Action Items

Determine Which Parts of the Housing Wheelhouse to Work In

1. The Board should determine which part of the housing wheelhouse it wants the CVRD to work in – affordable housing, addressing homelessness, or both. Depending on which part(s) of the wheelhouse it wants the CVRD to work in, the Board may wish to consider amending the Homelessness Supports Services to focus on that specific area or consider having an affordable housing service that is separate from a Homeless Supports Service so that one can focus more on addressing homelessness and the other can focus on affordable housing more generally.

The Coalition has adopted a housing wheelhouse to represent the range of housing types available in a community. The wheelhouse includes a safety net (emergency shelter, short-term supportive housing), housing with supports (long-term supportive housing, subsidized rental housing) and market housing (rental and homeownership). The Board should determine which parts of the wheelhouse it wants to work in and the extent to which the work should focus on those at risk of or experiencing homelessness or the broader need for affordable housing. There is a clear need in parts of the wheelhouse that address homelessness and a need for additional affordable housing more generally.



The Housing Wheelhouse



Although the need to address homelessness has increased since the pandemic, the developments being funded through Homeless Supports Service has not targeted people experiencing homelessness. The Homeless Supports Service is, however, helping to increase the supply of affordable housing for low- and moderate-income households. Establishing separate funds for affordable housing and homelessness or amending the Service to clarify the focus would allow for better targeting of resources to the specific objectives of the fund.

Homelessness Plan and Affordable and Supportive Housing Land Infrastructure Plan

Depending which parts of the housing wheelhouse the Board wants to work in, the Board should consider one or both of the following recommended actions.

2. The Board should consider having CVRD lead the development of a homelessness needs assessment and community plan for the regional district, in partnership with the Coalition.

A homelessness needs assessment should review current and future needs to address homelessness and consider what policy framework currently exists in local official community plans and what roles various stakeholders are currently taking on.

As discussed in the 2021 review of HSS, a community plan to address homelessness using best practice approaches is recommended to ensure strategic and effective use of resources to address homelessness. A plan can help guide priorities for investment of HSS funding and inform strategic opportunities for using ESS to acquire land for emergency shelter or supportive housing.



Given the CVRD's capacity, it is recommended that the CVRD lead this work. The plan should include:

- Engagement with relevant community players, including all levels of government, mainstream and homelessness service providers and people affected by homelessness
- A statement of guiding principles
- Goals, objectives, timelines, responsibilities, benchmarks and measurable targets
- Discussion of resources needed for implementation
- Direction on implementation actions and governance options to move the actions forward.

The plan should incorporate the development of an affordable and supportive housing and emergency shelter land infrastructure plan (discussed further in the next recommendation) so that the community plan can identify concrete priorities for sites to be developed for affordable and supportive housing and emergency shelter for people experiencing homelessness.

3. The Board should consider having the CVRD develop an affordable and supportive housing land infrastructure plan that maps out surplus and other available sites, including property owned by municipalities, school districts, health authorities, possibly non profits and faith-based communities, and prioritizes sites for affordable housing based on needs and time/level of difficulty to get the sites to a stage that they are ready for construction.

An affordable and supportive housing land infrastructure plan will support the creation of shovel ready projects so that community partners are prepared to access senior government funding when it is available.

The Plan should consider both stand-alone developments and co-located facilities with other municipal infrastructure.

The plan can help manage investments by establishing priorities for development sequencing based on readiness and need, thus reducing resources that are being requested for multiple developments at various stages of readiness.

An investment strategy should be developed to support the land infrastructure plan, including identifying how HSS and ESS could support development. Funding commitments through HSS and ESS can then be directed to one project at a time, supporting the financial viability of the project and demonstrating regional contributions to the project.

Role of CVRD

4. The Board should determine the strategic role it wants to take related to homelessness and which structure best fulfils its identified role. The Board should identify which roles it will take primary responsibility for, and which will be joint responsibilities shared by local municipalities and the Coalition or other bodies.

Once the Board has determined which part of the housing wheelhouse the Board wants the CVRD to work in, the Board should determine which roles it wants to play in implementing a homelessness plan and/or an affordable and supportive housing land infrastructure plan. The specific roles and structures would depend on which part of the housing wheelhouse the Board



wants the CVRD to work in, which roles it would like to see as CVRD roles versus municipal roles, and how intensive of a role it wants to play.

Six potential structures have been outlined the following table, ordered from least complex to implement/least intensive role, to most complex/intensive.

Structure	Focus within the Housing Wheelhouse	Ease of Implementation
Committee	Could focus on homelessness or affordable housing	Simple
Housing and Homelessness Facilitator	Could focus on homelessness or affordable housing	Simple
Direct Provision	Could focus on short-term supportive housing, long-term supportive housing, subsidized rental housing focusing on people experiencing or at risk of homelessness or affordable housing more broadly	Simple
Backbone Organization	Focuses on homelessness (emergency shelter, short-term supportive housing, long-term supportive housing, subsidized rental housing focusing on people experiencing or at risk of homelessness)	Moderately complex
Land Trust	These typically focus on affordable housing	Moderately complex
Housing Organization (Housing Authority / Housing Development Corporation)	These typically focus on affordable housing	Moderately complex

Further details on each of these potential structures have been provided below.

- i. The Board should consider leading a committee to manage implementation of a homelessness plan and affordable and supportive housing land infrastructure plan. It could include senior leaders from the Regional District, local municipalities, and non-profit organizations to provide oversight and guidance on implementation.

A group of decision makers representative of key sectors that guide the overall direction and implementation work is essential for addressing homelessness. The committee [managing implementation of the homelessness plan and affordable and supportive housing land infrastructure plan](#) could be the first touch point in addressing housing and homelessness needs. This would support relationship building and help the community move forward together. Local municipal representation would also support shared ownership of the plan. If the resources the Board wants to dedicate to implementation are limited, the Board could consider leveraging existing staff to lead a committee to manage implementation.



Below is a summary of this role.

Structure	Committee
Description	A group of decision makers representative of key sectors that guide the overall direction and implementation of a homelessness plan and affordable and supportive housing land infrastructure plan. This includes identifying implementation actions and assigning responsibility as well as monitoring performance and revising strategies as required.
Benefits	<ul style="list-style-type: none"> • Supports relationship building • Allows the community to move forward with a shared direction
Considerations	<ul style="list-style-type: none"> • Requires resources to support the committee
Implementation Process	<ul style="list-style-type: none"> • Engaged stakeholders to determine composition of committee • Develop Terms of Reference • Recruit members • Establish regular committee meetings

- ii. The Board should consider adding a dedicated housing and homelessness staff resource to act as a housing and homelessness facilitator to manage implementation of a homelessness plan and affordable and supportive housing and emergency shelter land infrastructure plan aimed at addressing homelessness.

Dedicated, highly capable human resources to provide administrative support/project management throughout the process of both developing and implementing a community plan are essential to the success of a community plan. As such, the Board should consider adding a dedicated housing and homelessness staff resource to act as a housing and homelessness facilitator to manage implementation of a homelessness plan and affordable and supportive housing and emergency shelter land infrastructure plan. Working as a coordinator role on behalf of all the municipalities in the regional district could position the community for greater impact.

The following is a summary of the Housing and Homelessness Facilitator role and considerations related to the role.

Structure	Housing and Homelessness Facilitator
Description	<p>A homelessness and housing facilitator role would support a working group(s) to manage implementation of a homelessness community plan and affordable and supportive housing land infrastructure plan aimed at addressing homelessness.</p> <p>Suggested responsibilities for the role include:</p> <ul style="list-style-type: none"> • Supporting a working group(s) to manage implementation of a homelessness community plan and affordable and supportive housing land infrastructure plan aimed at addressing homelessness • Coordinating with local municipalities on goals and outcomes and identified initiatives in a homelessness community plan and supporting execution of outcomes



	<ul style="list-style-type: none"> • Leading collaborative sector planning processes to support housing outcomes • Supporting recruitment and onboarding of partners to participate in initiatives and developments to address homelessness • Leading communities of practice, providing support to respond to challenges and identify solutions • Supporting and playing a key role in strategic funding partnerships, including on prospecting and recruitment, building and delivering partnership proposals and agreements, and ongoing high-level stewardship of key groups and partners, including meeting with provincial representatives about BC Builds • Developing relationships, and through these relationships building the capacity of the sector to respond effectively to homelessness.
Benefits	<ul style="list-style-type: none"> • Provides flexibility for what is included in this role • Allows for coordination/partnerships to be actors together to plan and develop projects • Can support the capacity building of other stakeholders to more effectively build housing • Can support others in better understanding the market and opportunities for affordable housing
Considerations	<ul style="list-style-type: none"> • Direction could change as strategic direction within the organization changes
Implementation Process	<ul style="list-style-type: none"> • Develop job description • Retain/designate human resources

- iii. The Board should consider having the CVRD or another entity act as a backbone organization for homelessness system planning and implementation, including allocating resources for a staff position(s) to support the community's efforts in addressing homelessness and creating housing.

Homelessness system planning refers to the development of plans to end homelessness as well as the implementation strategies moving the plan into action. System-focused planning emphasize efforts to end homelessness rather than just managing homelessness, and involves building the infrastructure to sustain the community's approach to reducing inflows into homelessness and increasing and streamlining access to permanent housing. Homelessness system planning should be done collaboratively, and should include a regular process to engaged stakeholders in reviewing progress and learnings, and making decisions on strategy shifts based on new learnings and evidence.

One of the key conditions for success in implementation a system-approach to addressing homelessness is having a backbone support organization. Backbone organizations prioritize, coordinate and guide the actions and sequences to undertake collective action. The backbone organization should have clear deliverables tied to coordination of efforts to address homelessness. The backbone organization would begin with developing the homelessness plan and then work on its implementation.

This is a different role than the coordination role currently taken on by the Coalition, which is largely focused on facilitation of the Coalition's activities related to the HSS and community engagement.



While this does not necessarily have to be a CVRD role, the CVRD seems strongly positioned to take on this role. In some communities this role is taken on by a municipal government or by a non-profit funder who oversee financial reporting or monitoring. In other contexts, this role can support a group of representative stakeholders working as a collaborative. The organization taking on this role has to be a key driver and catalyst for change in the community and be able to manage complex and fluid tasks, such as transitioning the array of services in a community. Even if the organization has limited control over the actions of other stakeholders in the community, they need to have the necessary leadership to move plans forward. Who takes on this role can impact its effectiveness as a result of the administrative and policy context in which they operate. The role is a significant undertaking in relationship management and collaboration.

The following is a summary of the Backbone Organization role and considerations related to the role.

Structure	Backbone Organization
Description	A lead entity to manage diverse relationships and agendas to move the community's homelessness priorities forward. The work for the backbone organization includes taking the lead role in implementing the local homelessness plan as well as its continuous improvement – it includes both coordinated homelessness services and a role in the development of housing solutions for people experiencing and at risk of homelessness. The role also includes coordinating a performance measurement processes and developing a formalized homelessness strategy review process. The backbone organization works as a key driver and catalyst for change to implement homelessness best practices in the community. They are responsible for wearing the vast array of services funded by multiple sources into a coherent service landscape moving towards shared goals.
Benefits	<ul style="list-style-type: none"> • Provides the “glue” to being various stakeholders together and helps the community coordinate disparate services into one system that is working together towards shared goals • May include larger influence on investment from senior governments when taking on this role versus the homelessness and housing facilitator as it demonstrates a more significant involvement in the issue
Considerations	<ul style="list-style-type: none"> • The governance body for the backbone organization could be the Board of a municipality/regional district or could be a collaborative of representative stakeholders • Significant undertaking in relationship management and collaboration
Implementation Process	<ul style="list-style-type: none"> • Engage other stakeholders in the homelessness system to confirm role • Identify a governance structure • Engage stakeholders in preparing a homelessness plan • Manage implementation of homelessness plan

- iv. If the Board wishes to have a direct role in affordable housing development, it should consider structures such as the CVRD directly providing housing, creating a separate housing organization (development corporation or housing authority), or establishing a land trust.

Summaries of these roles have been provided below.

Structure	Direct Provision
Description	In this option the responsibility for housing development would be assumed by the CVRD.
Benefits	The fullest extent of direct control by the CVRD
Considerations	<ul style="list-style-type: none"> • Requires affordable housing debt to be included within the CVRD's borrowing limits • Would require ongoing property management, provide management and finance expertise
Implementation	<ul style="list-style-type: none"> • Retain human resource or development consultant with expertise in affordable housing development • Identify initial development • Secure seed funding for housing development • Create the business plan for housing development • Conduct pre-development activities on site • Secure funding • Develop units

Structure	Land Trust
Description	Land trusts are a tool where a municipality or a non-profit organization (e.g. a land trust) acquires land, ideally at a low cost, to hold for the benefit of permanent affordable housing. Property for affordable housing is typically acquired through donations or grants of land from sources such as the municipality or provincial government. Land trusts often maintain ownership of the land while making it available for housing through land lease or housing rental agreements to ensure long-term control of the land.
Benefits	<ul style="list-style-type: none"> • As land is donated, this approach requires fewer resources and energy to undertake than other strategies • Suitable in smaller communities with more and somewhat less valuable land than urban areas • Potential for lower cost housing due to low cost of land and lower infrastructure requirements
Considerations	<ul style="list-style-type: none"> • Leased land can be more complicated to administer and to attract buyers than a model where the land is sold but controlled by another mechanism such as a covenant • Requires the support of a strong organization and partners for administration of the land, sales, development, resales etc.
Implementation Process	<ul style="list-style-type: none"> • Land trust organization development in the case of a using a Land Trust



	<ul style="list-style-type: none"> • Donation or acquisition of land under conditions to be used for affordable housing • Release of land through a lease or arrangement to a third party to develop the land for affordable housing
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Structure	Housing Organization (Development Corporation or Housing Authority)
Description	A housing organization is a non-profit entity dedicated to providing and managing non-market housing stock that is for rent or purchase by qualified individuals and families. In addition to being a repository for affordable housing units, a housing organization can house expert advisors on affordable housing, ongoing champions for affordable housing, and in some cases leverage expert skills and know-how to support other needs such as property management.
Benefits	<ul style="list-style-type: none"> • Affordable housing is more likely to be produced and effectively managed when a high functioning organization is dedicated to that goal • Acts as a community resource for housing • Can monitor the process of rentals and resales to ensure qualified individuals and families • Can hold housing funds and act as project managers for new developments
Considerations	<ul style="list-style-type: none"> • Needs funding to get started • Small communities may not be able to support an organization; however, a regional housing organization serving several communities in a region may be feasible • Requires a self-funding business plan to limit additional requests for funding
Implementation Process	<ul style="list-style-type: none"> • Establish the organization with the right members • Secure seed funding • Create the business plan • Develop/acquire units and manage projects and activities Continue to manage the activities of the organization including ongoing professional development for staff and Board members

Action Items to Address Gaps that Could be Part of the CVRD's Role

The following are suggested actions that the CVRD should consider taking on to address existing gaps.

Capacity Building Strategy

5. The Board should consider establishing a capacity building strategy to support increased capacity for affordable and supportive housing development.



The strategy would outline training and tools the CVRD would use to engage non-profit organizations, faith communities, municipalities, the private sector and other interested parties to build an understanding of development, identify surplus lands owned by these groups, identify the development model and mix for private lands, and potential partnerships. Local municipalities aren't currently in the process of developing large civic projects, so they don't have as much capacity in this area as they may have had in certain periods in the past.

Support to Local Municipalities

6. The Board should consider working with local municipalities to provide management support for planning for affordable and supportive housing aimed at addressing homelessness. This could include working with local municipalities to locate sites, determine size and scale of potential housing development, determine a plan for development, solicit proposals for housing and homelessness initiatives, identify partnerships, prepare funding applications and pursue resources and professional help to assist with pre-construction activities.

Local municipalities indicated that they do not have the capacity to manage activities necessary to bring land from to a "shovel ready" stage for affordable or supportive housing development and would benefit from assistance with this. Providing this support, could position the community for greater impact.

Coordinated Access System

7. If the Board wants to move the community forward with a Coordinated Access System, it should consider incorporating this into the work of the CVRD or another entity acting as a backbone organization for homelessness system planning and implementation.

A Coordinated Access system:

- Identifies clear access points for people with housing challenges to get connected with services and housing
- Includes a process that triages people with housing challenges to the most appropriate service, and if necessary, further assessment using common tools to determine who is in need of what forms of housing
- Includes a consistently applied approach to prioritize people for housing resources
- Includes a process to match and refer people to housing resources when a vacancy becomes available
- Uses a centralized information management system to track person-level data
- Has a dedicated inventory of housing resources that participate in Coordinated Access
- Requires staffing resources, including a Coordinated Access Lead and an information management system lead

The 2021 review of HSS recommended that the community implement Coordinated Access to homelessness resources. A coordinated access process can:

- Provide improved data to support system planning, resource allocation and reporting
- Provide greater confidence that housing resources are helping the intended people
- Provide a stronger ability to identify areas for improvement and take action to achieve community-level outcomes



- Provides a shared understanding of who will be served and how and the rationale behind these decisions
- Create improved communication between service providers
- Promotes greater collaboration and shared accountability for positive housing outcomes when working with common clients
- Provide a greater understanding of the process to access housing-specific resources
- Provide a faster connection to housing resources without needing to share personal information multiple times.

Coalition leadership reported that they have been pursuing funding for a Coordinated Access System, but the community is in the early stages of its considerations related to Coordinated Access. Service providers do not necessarily have a consistent understanding of what Coordinated Access is or its value, and do not necessarily have buy in for the process.

It is unlikely that a Coordinated Access System would be successfully implemented without a backbone support organization taking responsibility for planning and implementation.

Other Opportunities to Refine HSS and ESS

Allocation of HSS Funding and Participation of Individuals with a Lived/Living Experience of Homelessness

Depending on the direction determined by the Board, the following recommendations on HSS and ESS should be considered.

8. The Board should consider rescinding or revising the existing Service Delivery Policy to ensure a more rigorous process for evaluating HSS applications and a more equitable and inclusive process, that includes engagement with people with lived experience.

The existing Service Delivery Policy has set the CVRD up as the fiscal host of the Homeless Support Service, without a role in ensuring an effective decision-making process for determining funding allocations. The Service Delivery Policy could be rescinded or revised to address this. Specific suggestions to increase rigour in the evaluation process have been outlined in the recommended framework for evaluating funding applications, which has been provided in Appendix 4.

The Coalition has been engaging with individuals currently experiencing homelessness through informal drop-in engagement sessions, but they have not participated in reviewing funding applications. Coalition leadership also reported that the applications being put forward would not be particularly relevant to the individuals being engaged. This may be important feedback for Coalition members to hear and reinforces the importance of engagement with people with a lived experience of homelessness.

Given the limitations of the current approach to engaging with individuals experiencing homelessness, it is recommended that other alternatives be considered to involve individuals with lived experience in the Service. It may allow for opportunities for more meaningful feedback if engagement was with people who have been homeless, but are not actively



experiencing homelessness, and if engagement was with a consistent group over a longer period of time, such as a lived experience advisory committee.

9. The Board should consider delivering HSS directly and treating HSS as a reserve fund that can be used to direct available resources in a targeted fashion towards initiatives that are planned within a community plan to address homelessness/ affordable and supportive housing land infrastructure plan and to capitalize on opportunities as they arise, rather than allocating funds on an annual basis.

Directly delivering HSS could provide the Board with greater opportunity to direct funding based on the goals that the board identifies as important elements for addressing homelessness. Direct delivery could also reduce real or perceived barriers related to the current requirement of applicants having to be a member of the Coalition to receive funding.

Using HSS as a reserve fund would allow the CVRD to take advantage of unique opportunities and address specific Board determined needs that exist within the community. It would also provide flexibility to contribute to projects as they arise.

10. The Board should consider opportunities to align the use of HSS funding with the ESS.

This would better enable the community to acquire land for emergency shelter and supportive housing through the ESS and then engage in pre-development activities to help get the development to a “shovel ready” stage with funding from the HSS.

Opportunities to Incorporate Relevant Policies Related to HSS and ESS into the Regional Growth Strategy

11. The Board should consider incorporating policies or approaches into a Regional Growth Strategy Action Plan that align with and support HSS and ESS.

These could include:

- A commitment of the CVRD to prepare and implement a homelessness needs assessment and prepare and implement a community plan to address homelessness for the regional district that identifies opportunities to use existing land assets and participate in programs with other levels of government to secure additional resources to meet the needs of people at risk of and experiencing homelessness.
- A commitment of the CVRD to monitor progress of the region and local municipalities in implementing the community plan to address homelessness and reducing the number of people experiencing homelessness
- A commitment of the CVRD to assist local municipalities in developing their own housing and homelessness assessments and plans by working with local municipalities to prepare, review, and update targets, policies, needs assessments, and reports.
- A commitment of the CVRD to supporting planning, acquisition, and use of land for affordable and supportive housing and emergency shelter, including developing an affordable and supportive housing land infrastructure plan, support obtaining property, conducting due diligence on land, building and delivering partnerships to develop and



operate affordable and supportive housing for people experiencing homelessness or at risk of homelessness.

- A commitment of the CVRD to advocate to senior levels of government to provide capital and operating funding to meet the current and anticipated housing needs of people experiencing or at risk of homelessness, as determined by housing and homelessness needs assessments or reports.
- A statement that regional housing needs assessments, strategies and action plans and local housing needs assessments, strategies and action plans must align with and integrate plans to address homelessness.
- A statement that requires local municipalities to identify strategies, policies and actions to reduce the number of people experiencing or at risk of homelessness within their jurisdiction and financial capabilities.
- A statement that requires local municipalities to indicate how they will collaborate with other governments, nonprofit housing and homelessness services providers, and other partners on coordinated actions to address regional homelessness.



Appendix 1 – Homelessness Supports – Service Delivery Policy

See following page.



Subject: Homelessness Supports – Service Delivery Policy	
Branch: Executive Management	
Department: Public	Policy Reference: 5040-00

Purpose

The purpose of this policy is to establish a service delivery framework for the homelessness supports service, established by the adoption of Bylaw No. 389 being “Comox Valley Homelessness Supports Service Establishment Bylaw No. 389, 2015”. The purpose of the service is to provide funds to one or more local non-governmental organizations based on a board approved five-year action plan to address homelessness in the Comox Valley.

Scope

This policy provides the framework for delivering the homelessness supports service. The policy identifies the role of the Comox Valley Regional District (CVRD) board, staff, external agencies and the Comox Valley coalition to end homelessness.

Guiding Principle

This service delivery policy framework:

1. Provides for open, transparent governance;
2. Maximizes efforts to end homelessness by utilizing on-the-ground, community-based expertise to prioritize housing and homelessness needs in the Comox Valley;

Policy Statement

1. Annually, the coalition will work with local non-governmental organizations to develop a five-year action plan to address homelessness in the Comox Valley. The plan will include performance measurements.
2. Annually, the CVRD board may approve the current-year funding request as established in the five-year action plan.
3. The coalition may identify a need within its action plan to set aside funds for a future activity and the board may assign funds to a reserve account.
4. The CVRD board may provide input to the coalition on strategic goals that the board identifies as important elements for addressing homelessness.
5. The recipient organizations will report at least annually to the coalition and the CVRD board on the outcome of the actions funded by the homelessness supports service.
6. Should the Comox Valley coalition to end homelessness disband or otherwise cease to operate or exist, the CVRD board:
 - a) may direct funding on its own accord and
 - b) will seek a community-based organization or group of organizations to continue developing a five-year action plan to address homelessness in the Comox Valley
 - c) update this policy to reflect the transition from the coalition to a new coordinating body.

Approval History

Policy adopted:	September 29, 2015
Policy amended:	

Appendix 2 – Status of Recommendations from Previous Review of HSS

Below is a summary of the status of the recommendations from the previous review of HSS.

Recommendation from Previous Review	Status
Consider increasing the tax requisition for the Service to further contribute to the achievement of the goals outlined in the 5 Year Plan to End Homelessness	Maintained existing tax requisition
Consider revising the Service or establishing another service to support borrowing by the Regional District to fund capital investments to address homelessness	Emergency Shelter Service has been revived for the purpose of purchasing land
Explore whether the Town of Comox may be interested in participating in the Service and whether the City of Courtenay and Village of Cumberland may be interested in contributing other resources they have earmarked for affordable housing	For future consideration
Prepare promotional materials to raise the profile and transparency of the Service	To be prepared as part of current initiative
Provide funding to the Coalition for management and administration	Complete
Partner in the preparation of a homelessness needs assessment and community plan to address homelessness that is based on best practices	Not yet started
Use a portion of the funds to support a Coordinated Access system for Comox Valley or continue to pursue funding from other sources to support a Coordinated Access system	Coalition has been pursuing funding for Coordinated Access
Prioritize funding allocations based on best practice for investments aimed at addressing homelessness	Not yet started. Evaluation framework to be prepared as part of current initiative
Following the creation of a community plan to end homelessness that outlines the actions and investments required to end homelessness in Comox Valley, the CVRD, in partnership with the Coalition, convene collaborative conversations with homelessness funders	Not yet started
Increase the maximum funding that is provided for pre-development planning costs from \$5,000 to \$10,000	Complete
Collect additional information through the Request for Expressions of Interest process to support additional evaluation of applications	No yet started. Expanded Expression of Interest to be prepared as part of current initiative
Establish an evaluation committee with time-limited participation to support the evaluation of applications	Complete
Develop mechanisms for participation of individuals with a lived/living experience of homelessness in the Service	Mechanism for Coalition to engage with individuals with a lived/living experience established, but has not



Recommendation from Previous Review	Status
	<p>involved participation in the Service</p> <p>In addition, the Coalition has revised the Leadership group guidelines so that when it's appropriate an individual with lived experience could participate on the leadership group</p>
Allocate funding to support the participation of individuals with a lived/living experience of homelessness in the Service	Complete



Appendix 3 – How the Coalition Would like to Implement Select Recommendations from the Previous Review

Below is a summary of how the Coalition would like to implement select recommendations from the review of HSS in 2021.

Recommendation from Previous Review	Feedback from the Coalition
Partner in the preparation of a homelessness needs assessment and community plan to address homelessness that is based on best practices	Coalition leadership did not see a strong need for a needs assessment. If a needs assessment were conducted, they would like to see a maximum timeframe of two months. Point-in-Time count data could be incorporated into a needs assessment in the Fall.
Use a portion of the funds to support a Coordinated Access system for Comox Valley or continue to pursue funding from other sources to support a Coordinated Access system	<p>The Coalition is interested in conducting a workshop with Coalition members about explain Coordinated Access and explore interest.</p> <p>Coalition leadership suggested CVRD's role related to Coordinated Access could include providing letters of support for coordinated access grant applications or collaborating on a grant.</p>
Prioritize funding allocations based on best practice for investments aimed at addressing homelessness	<p>Coalition leadership is hesitant to choose between different applications. They feel the HSS is prioritizing the most vulnerable, including people who are experiencing homelessness or are at risk, but not necessarily targeting people experiencing visible homelessness on the streets.</p> <p>Coalition leadership would like to clarify what HSS is intended to be used for. They feel funds should be used primarily for physical units, and don't think the funds should support rent subsidies.</p>
Collect additional information through the Request for Expressions of Interest process to support additional evaluation of applications	Coalition leadership would like to keep the application simple, but are considering some changes to the application.
Develop mechanisms for participation of individuals with a lived/living experience of homelessness in the Service	Coalition leadership has been having discussions about how to also reach others who might be more appropriate to the EOI process, but not concrete next steps were identified.



Appendix 4 – Recommended Evaluation Framework for HSS Submissions

Evaluation Criteria

Proposals will be assessed based on the criteria set out below. A Successful Applicant must score a minimum of 70% in total.

Criteria	Weight
Population Groups Served	20%
Depth and Duration of Affordability	20%
Funding is Leveraged	20%
Integration of Supports	10%
Construction and Funding Readiness	10%
Financial Sustainability	10%
Organizational Capacity and Partnerships	10%

Evaluated Submission Questions

The following are recommended questions to inform the evaluation of applications.

Criteria	Weight
Population Groups Served What percentage of households housed are likely to be in the following groups? <ul style="list-style-type: none"> • Women led • Lone-Parent Households • Seniors • People with Visual, Audio, or Physical Disabilities • People with Mental Health or Learning Disabilities • Visible Minorities • Transgender or Non-Binary Person • Indigenous Peoples • People who are Experiencing Homelessness Discuss any research conducted or referenced to estimate the percentage of specific groups likely to be housed.	20%
Depth and Duration of Affordability Which depth of affordability the project will achieve: <ul style="list-style-type: none"> <input type="checkbox"/> Rents charged will be on average 20% or lower than the median or average rent for similar unit based on municipal or electoral boundaries. <input type="checkbox"/> Rent charged will be on average 30% or lower than the median or average rent for similar unit based on municipal or electoral boundaries. 	20%



<p><input type="checkbox"/> Rents charged will be based on 30% of gross household income or Provincial Income Assistance Shelter Allowance</p> <p><input type="checkbox"/> Rents charged will be on average 20% or lower than the median or average rent for similar unit based on municipal or electoral boundaries.</p> <p><input type="checkbox"/> Affordable ownership housing targeting households with incomes that can afford (based on 30% of gross household income) less than 20% below the median or average rent for a unit with the same number of bedrooms</p> <p>Are utility costs included in rents? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>How long will the organization guarantee that the housing will achieve the above affordability levels?</p>	
<p>Funding is Leveraged</p> <p>Please describe how the application will leverage funding from other orders of government, private non-profit and for-profit sector.</p>	20%
<p>Integration of Supports</p> <p>Please describe how supports will be integrated into the housing.</p>	10%
<p>Construction and Funding Readiness</p> <p>When is construction anticipated to start?</p> <p>Please describe any site zoning and servicing, approvals and land ownership/purchase/leasing arrangements that are already in place or timelines for the completion of these items.</p> <p>Please outline any funding that has been secured.</p>	10%
<p>Financial Sustainability</p> <p>Please describe or provide evidence to demonstrate financial sustainability of the project.</p>	10%
<p>Organizational Capacity and Partnerships</p> <p>Please describe how your organization has the experience and expertise to implement the proposed project.</p> <p>Please explain how you will create alliances within your project.</p> <p>Will any other organization, networks, or partners fund the project?</p>	10%



<input type="checkbox"/> Yes <input type="checkbox"/> No If yes, please clearly identify the role/s, expertise, and/or contribution they will bring to the project.	
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Evaluation Support Tool

The following tool is intended to support the evaluation and scoring of the applications.

Criteria	Weight
Population Groups Served Points should be awarded for the percentage of specific population groups that are likely to be served by the project. More points should be awarded for projects likely to serve population groups with high percentages of core housing need. Core housing need of specific groups of renter households in Comox Valley are outlined below. More points should be awarded for <ul style="list-style-type: none"> • Women led – 26.4% • Lone-Parent Households – 21.6% • Seniors – 35.3% • People with Visual, Audio, or Physical Disabilities – 23.3% • People with Mental Health or Learning Disabilities – 17.7% • Visible Minorities – 12.9% • Transgender or Non-Binary Person – 27.3% • Indigenous Peoples – 28.3% • People who are Experiencing Homelessness – 100% Projects serving households that fall into multiple of the above categories should be awarded more points than projects serving households that only fall into one of the above categories. Rental housing projects that are not likely to have at least 50% of households fall into one of the above categories should not get more than Core housing need of owner households is 4.9% versus renters at 22.1%. As such, projects targeting owner households should only receive a quarter of the points of a rental project targeting similar population groups. Projects with strong research conducted or referenced to estimate the percentage of specific groups likely to be housed should be awarded more points.	20%
Depth and Duration of Affordability Projects charging rents based on 30% of gross household income or Provincial Income Assistance Shelter Allowance that will guarantee these rent levels for 30 years or more should get full points. Projects should get minimum points if rents charged will be on	20%



<p>average 20% or lower than the median or average rent for similar unit based on municipal or electoral boundaries, particularly if utilities are not included, and higher points if rents will be 30% lower than the median or average rent for similar units.</p> <p>Projects guaranteeing rent affordability for longer should get more points.</p> <p>Affordable ownership projects should be assessed similarly. If they target households with incomes that can afford (based on 30% of gross household income) greater than 20% below the median or average rent for a unit with the same number of bedrooms, they should not be awarded points in this category.</p>	
<p>Funding is Leveraged</p> <p>Applications leveraging a higher percentage of funding from other orders of government, private non-profit and for-profit sector should get more points. Projects to receive 75% or more of their funding from HSS should not get points.</p>	20%
<p>Integration of Supports</p> <p>Projects providing supportive housing should get full points. Projects without supports should not get points.</p>	10%
<p>Construction and Funding Readiness</p> <p>Projects anticipated to start construction within 6 months and with other funding secured should get full points. Fewer points should be awarded if funding has not yet been secured or site zoning and servicing, approvals and land ownership/purchase/leasing arrangements are still required.</p>	10%
<p>Financial Sustainability</p> <p>Projects should be awarded full points if they provide strong evidence to demonstrate financial sustainability of the project. No points should be awarded if financial sustainability is not demonstrated.</p>	10%
<p>Organizational Capacity and Partnerships</p> <p>More points should be awarded for applications demonstrating strong organizational experience and expertise to implement the proposed project and strong partnerships. Fewer points should be awarded if these are not demonstrated.</p>	10%
<p>Total Score</p> <p>Projects with scores less than 70% should not move on to further evaluation and recommendation.</p>	100%

