



Homes First Society

Rent Geared to Income (RGI) Calculation Policy and Procedure

All staff are to use the City of Toronto's Rent-Geared-to-Income Administration Manual and the templates provided by the City of Toronto for calculating rent.

Always refer to the current version of the on-line RGI Administration Manual when administering the RGI program, currently found at:

<https://www.toronto.ca/community-people/community-partners/social-housing-providers/rent-geared-to-income-administration/> (If this link becomes stale, search for "City of Toronto RGI Administration Manual".)

In addition to the forms and templates found in Chapter 10 of the RGI manual, please see the City's website for:

- RGI Calculation Forms:
 - Household income and asset review form - Sample
 - RGI calculation worksheet
- Mandatory Forms:
 - Notice of Decision, Loss of Eligibility for RGI Assistance
- Notices:
 - Reminder notice to send income & asset review form
 - Missing information on income & asset review form
 - Notice of decision
- Medical Forms:
 - Form 1: Medical need for an additional bedroom
 - Form 2: Care agency's verification
 - Form 3: Caregiver's verification

All RGI calculations require approval by the Assistant Housing Manager or the Director of Finance.

Ensure that you use the most recent manual and templates at all times.

Record Keeping:

RGI Administrators are responsible for the information they collect in carrying out their duties under the *Housing Services Act* (HSA).

The HSA sets certain rules about keeping records. A record is:

- any document or written material created by a housing provide
- any document or written material related to the operation of a housing project that is given to a housing provider.

HFS must keep the financial and project records for each fiscal year for at least 7 years.

Homes First is responsible for keeping files for current RGI households. We must keep these files for at least 7 years after the household moves out. In addition, HFS must keep documents about initial eligibility (application, status in Canada, etc.) in the current RGI files throughout the tenancy and must keep these records for 7 years after the household ceases to be eligible (pays market rent or moves out).

Homes First must keep a written record of the decision to refuse to offer a unit to an applicant for 7 years. The record must include:

- the decision
- a copy of the notice given to the household
- the facts that were used to make the decision.

Checklist for RGI File:

For each household, make sure the file contains:

- A chart o keeping track of what has done and when it was done. (To ensure that we follow the correct procedures.)
- Completed leases
- All completed income and assets reviews for the duration of the tenancy, including:
 - Proof of income documents, and
 - a consent form signed by all people in the household 16 years of age or older. If a person in the household is unable to sign, a consent form may be signed by a person with authority to sign on their behalf. Consent forms allow RGI Administrators to collect and share personal information about the applicants. Complete documents to verify income and assets
 - a rental history record
 - documents to verify each member's status in Canada
 - a written record of any review of a decision
 - RGI Rent calculation worksheet
 - all notices of annual income and asset reviews
 - all notices of rent changes
 - all correspondence to and from members of households about the RGI program.

Exemption: If a member of a *special priority household* feels that they may be at risk if they attempt to obtain documents to verify their income or family composition, the housing provider cannot require the documents.

Protecting Personal Information:

RGI Administrators collect personal information to determine if a household is eligible for RGI assistance. We must follow the guidelines in Regulation 367 and the *Municipal Freedom of Information and Protection of Privacy Act*.

When we request personal information, we must give the person a written notice that tells them why we need the information. Homes First must also tell them that we may share it with:

- The Minister of Municipal Affairs and Housing
- Other service managers
- Administrators appointed by a service manager
- Other housing providers/RGI Administrators
- Organizations providing services to any of the above
- An officer enforcing the law under the HSA, the *Ontario Disability Support Program Act*, the *Ontario Works Act*, or the *Day Nurseries Act*.

This notice must be in writing and include the name, title, business address, and phone number of a person that will respond to any questions or complaints about the collecting and keeping of personal information.

The agency can only use the information for the purpose stated in the notice.

There are special rules for handling personal information about people experiencing domestic violence. If information is collected to determine if a person is eligible for special priority, the agency can only use the information for that purpose. Reg 367, s.147

Regulation 367 sets out standards for collecting, using, disclosing, keeping, and disposing of personal information.

Personal information may be disclosed only if:

- the person the information is about consents to the release of the information
- the HSA, a Regulation, or an agreement under the Act allows you to share the information
- an officer, employee, agent such as a lawyer or auditor, or volunteer of the housing provider needs the information to perform their duties
- the information may affect the health or safety of the person the information is about. In this case, staff must notify the person in writing to tell them that you have shared personal information about them.
- there are “compassionate circumstances” such as an illness or an injury and sharing the information will allow someone to contact the next of kin or a friend.

People have the right to see information about themselves unless:

- the information reveals something personal about another person
- the information reveals something private about an organization
- giving out the information will put another person at risk.

If a person disagrees with the personal information in their file, they can ask HFS to correct it. Or they can add a written statement telling why they disagree with the information.

RGI Administrators should control access to all personal RGI information. Keep RGI files in a cabinet that can be locked. Use passwords to protect RGI information on computer systems. Do not send confidential information by fax.

Records should only be viewed by persons who need to see them to make decisions. When providing information to the board of directors about resident households, the names and unit numbers of should not be disclosed. Assign a number to each file being discussed. This ensures that the discussion is objective and that personal information remains confidential.

Homes First Society disposes of confidential records by shredding (secure shredding boxes are available at Shuter, Meegwetch, and all of Homes First Society's shelters, or through arrangement by the Administrative Coordinator).

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- Created on June 4, 2015.
 - Updated and approved by HFS Management Team on June 5, 2019.
 - This Policy applies to all Homes First housing.