Public Housing Rental Subsidy

Policy and Procedures Manual

Northwest Territories Education, Culture and Employment

Income Security Programs

Effective July 14, 2009.

A MESSAGE FROM THE DEPUTY MINISTER

I am pleased to provide you with this Public Housing Rental Subsidy (PHRS) Policy and Procedures Manual. It outlines the policies and procedures that must be followed in delivering the PHRS to Northwest Territories' residents.

The PHRS program focuses on providing a rental subsidy to low-income residents who are in need of support. While helping to pay for the cost of housing, the PHRS program also provides a component towards ensuring a standard of living and quality of life that is healthy and safe.

This is a living document. From time to time new policies and procedures will be added and existing ones amended or revoked. Please accept and use this document as the current PHRS Policy and Procedure Manual effective July 14, 2009.

Approved:

Deputy Minister
Education, Culture and Employment

2009-7-14
Date

Table of Contents

1 Introduction

The Policy

This manual explains the policies of the Public Housing Rental Subsidy (PHRS) program that must be followed throughout the Northwest Territories (NWT) and offers procedures on how to administer the program.

What it means

The public housing rental subsidy program
The PHRS program is one of seven Income Security Programs delivered by the Department of Education, Culture and Employment (Department). Income Security Programs provide financial resources in combination with other government programs and services to help people become independent and self-reliant.

The PHRS program helps people who live in Public Housing when they do not have enough money each month to pay the cost of rent in the Northwest Territories. The amount of support available to a Household Member(s) (HM) is based on where a person resides, the size of the family, and the HM ability to provide his/her own financial resources.

The Northwest Territories Housing Corporation's (NWTHC) role is to provide support and direction to the Local Housing Organizations (LHOs). The NWTHC also sets maximum rents for all housing units. The LHOs are the landlords and of the public housing units. The LHOs functions include allocating units, collecting the HM portion of the rent, handling maintenance and repairs of the units.

Other legislation
Other legislation can influence the PHRS program such as the Access to Information and Protection of Privacy Act (ATIPP) or the Financial Administration Act.

PHRS responsibility
The head of the PHRS Program is the Director of Income Security Programs (Director), Department of Education, Culture and Employment. He/she works out of the Department's Headquarters office in Yellowknife. When a Client Service Officer (CSO) finds himself/herself in a situation that is not covered by this Manual, the CSO, through his/her Regional Supervisor (Supervisor), should contact the Director, who will make a decision on how to handle the Tenant(s)' situation.

HM is no longer in need of a subsidy

When a HM is no longer considered to be in need, the HM is no longer eligible for the PHRS.

Customer service

CSOs are required to:

- Be respectful, honest, polite and courteous
- Divulge to their Supervisor when there is a conflict of interest with anyone in the household
- Provide information on all Income Security Programs to the HM
- Meet with the LHO at least once per month to discuss HM concerns or issues
- Provide an explanation to the HM if the CSO made a mistake on a HM PHRS calculation
- If there is not a CSO in an LHO's community, the Supervisor, or CSO assigned to the community, must arrange for a monthly meeting with the community LHO.
- Assist the LHO in case managing the HM
- Return enquiries (phone calls, emails, letters, verbal drop-ins) promptly, and/or provide an update on the status of the enquiry
- Complete the PHRS within two (2) working days of receiving all required information from the HM
- Maintain confidentiality at all times

CSO's friends and family

If a CSO is the sole Department's employee in the community, the CSO completes the assessment of the friend or family member, but must receive approval from a co-worker, Supervisor or HQ, to issue the PHRS to the friend or family member. In order to receive the approval, the CSO completes the assessment, puts a note in CMAS and faxes or emails all of the documents used for the assessment to the approver. The approver reviews the documents, puts a note in CMAS once approved, initials each assessment document and faxes or emails the initialed documents back to the CSO.

If a CSO is in a community where there is more than one CSO, the CSO's co-worker may assess and issue the PHRS to the friend or relative if that CSO is not also a friend or relative of the client. The Supervisor will determine the approval process.

How the manual is set up

The Manual groups the policies and procedures according to themes before providing an explanation.

Each section includes the following headings:

- **The policy** – the purpose or intention of these policies
- **What it means** – provides details and a how-to on policies

Each section may also include:

- **Current practice** – describes what approved practices are in place
- **Example** – describes "real life" examples of how the policies should be used
- **Note** – outlines any issues or circumstances that a CSO should be careful of, or be aware of

2 Definitions

The policy

For the purposes of this Manual, the Department has provided standard definitions as follows:

What it means

Acronyms – CSO = Client Services Officer
Department = Department of Education, Culture and Employment
Director = Director of Income Security Programs, ECE
HM = One or all of the people living in the household
HQ = The Headquarters' office of Education, Culture and Employment
HSSR = Housing Subsidy Summary Report
LHO = Local Housing Organization, Agency or Authority
Manual = This policy and procedure manual
NWTHC = Northwest Territories Housing Corporation
PHRS = Public Housing Rental Subsidy
Supervisor = The CSO's Supervisor (Manager or Superintendent)

Adult – A person who has reached the age of 19 years

Business day – Monday to Friday, excluding statutory and civic holidays.

Caregiver, live-in – A person who looks after an individual who is ill or has a mental, physical, or emotional disability. The caregiver lives in the household part or full-time.

Child – A person who is under the age of 19 years old.

CMAS – Case Management Administration System, the electronic information system that is used to calculate the PHRS and contains PHRS data as well as a number of other Departmental programs.

Compensation – Money paid or payable as compensation for harm (pain and suffering) done to an individual.

Confidentiality – Ensuring that all personal and financial information of a HM and/or individual Tenant and Client is kept private. Access is limited to only the appropriate people and used for the intended purpose. The CSO must observe and follow the NWT CSO's Code of Ethics and ATIPP in adhering to and respecting confidentiality.

Core Need Income Threshold – The CNIT is the total of both assessable and non-assessable income used by the LHO to determine eligibility for a public housing unit. It is not used by the CSO for the PHRS.

Director's authority – The Director of Income Security Programs has the authority to make a decision in a HM case.

Eligibility – A HM that qualifies for the PHRS program because their income is low or non-existent.

Family – This refers to immediate family and is defined as a CSO's father, mother, brother, sister, spouse, child, father-in-law, mother-in-law, son-in-law, daughter-in-law, grandparent, and all relatives permanently residing with the employee. (This includes step family members as well.)

Financial review – A review of the HM income that is required before the HM can receive the PHRS.

Friend – A close and favoured companion.

Headquarters – The head office of the Department where the Income Security Division is located, the Director is based, and support is provided for the administration of all Income Security Programs.

Household member – One or more people permanently residing in a public housing unit. Where income is mentioned with regards to a HM, the income is referring to those HM who are 15 years of age or older and are not in elementary, secondary or postsecondary school.

A HM does not include visitors of less than one calendar month but does include those HM who reside or are a resident of the unit and are just away from the unit on a temporary basis for the purposes of employment, medical treatment and education. [See definition of reside and resident.]

Income, Assessable – Income that is included in the calculation of the HM PHRS, see Appendix 1.

Income, Non-assessable – Income that is excluded from the calculation of the HM PHRS, see Appendix 1.

Landlord – The legal owner of most public housing units is the NWTHC. The LHO acts as a landlord of the public housing units in their community. In some cases, units are not owned by the NWTHC and the landlords rent from private businesses.

Month or monthly – The period of time that represents a calendar month, such as the month of February. [*Interpretation Act*]

Payable rent – The amount of rent the HM must pay (maximum rent less the PHRS is equal to the HM portion of rent payable).

Pro-rate – To divide expenses evenly based on a time period, such as days or months.

Rental Agreement – A residential tenancy agreement or lease. There are two types of leases: Month-to-Month is indeterminate unless the HM leaves or is evicted; and a Fixed Term, which has an end date and requires that the lease be renewed at the end of the period.

Reside – Where personal belongings are generally stored, where the reported address is on most official documents, is the place a HM returns to from their place of work (office, camp - two-in/two-out at a mine, etc.) and where one is inherently present.

Resident – A person lawfully entitled to be, or to remain in Canada, who makes his or her home within, and is ordinarily present in the Northwest Territories (NT). This does not include a tourist, transient, or visitor to the NWT.

Self-employed – An individual who operates their own business or profession, solely or with a partner, rather than working for someone else. This includes, but is not limited to a tradesperson, consultant, hunter, fisher, carver, artist, harvester, etc.

Senior – A person who is 60 years of age or older.

Separated – When couples no longer live together but are not divorced.

Spouse – A person, who is either married to another person, or living together, in a conjugal relationship outside of marriage.

Student (elementary and secondary) – A HM is registered at a school in the NWT (attending, on-line, correspondence, or home schooled) in kindergarten to grade twelve on a full- or part-time basis. [Education Act]

Student (postsecondary) – A HM who is 17 years of age or older and is registered at a postsecondary educational institution (attending, on-line or correspondence) in a postsecondary program and is enrolled in at least 60% of a 100% full course load, or as a person with a disability, enrolled in at least 40% of a 100% full course load.

Note

1. The words “must”, “shall” and “will” in this Manual, refer to something that has to be done, there is no choice.

2. The word “may” in this Manual is used to express possibility, opportunity or permission and it is not a requirement. This allows for discretion to be used.

3 Eligibility

The policy

The following are eligibility conditions that a CSO must follow when determining if a HM is eligible for the PHRS program. These eligibility conditions were developed from policies and practices of the NWTHC, LHO, and the Department.

A HM is eligible for PHRS if s/he is:

a) 15 years of age or older
b) Considered a resident of the NWT and is
c) Residing in a public housing unit operated by a LHO and is owned/leased by the NWTHC.

What it means

Allocating a public housing unit
The LHO determines who is eligible for public housing and allocates public housing units to eligible residents of the Northwest Territories.

Required eligibility documents
A HM that is new to a public housing unit must provide the following to the CSO:

a. Lease
b. PHRS-01A form
c. Income information (pay stubs, official letters, etc.)
d. PHRS-02, PHRS-03 or PHRS-04 forms as required, and
e. If the HM is not in CMAS, two pieces of formal identification, such as:
    i. Social Insurance Card (SIN)
    ii. Health Care Card
    iii. Drivers License

A HM returning within the same year must provide the following:

f. Lease from the LHO that proves the HM continues to occupy the same or new unit
g. PHRS-01B form
h. Information on new HM or HM who have left the unit, and
i. Above c. to e. as required

Every HM must provide the following on an annual basis to update his/her file:

j. Above a. to d.

When a married or common-law couple separates, the CSO may, if in doubt:

k. Obtain information on new HM or HM who has left the unit, and
l. Contact clientcheck@gov.nt.ca for assistance with verification of separation

When there is no income

When a HM has no income, s/he must still submit all required documents. On the Monthly Statement of Income, the HM simply puts dashes, or draws lines through each section and signs the Statement of Authorization. A written record of a HM information is necessary for auditing purposes.

Three-month mobility clause

A HM PHRS can continue for up to three months when the public housing unit has been vacated for the following reasons:

- HM on short-term training or education
- Abandonment
- LHO eviction process
- Out on the land
- Incarceration
- Temporary employment located out of town, and/or
- Medical related

If a HM has vacated a unit on a short-term basis for another reason other than the above, or wishes to vacate for more than three months, please contact your Supervisor who must discuss the HM circumstances with the Director.

It is the HM responsibility to notify both the CSO and the LHO. However, if the CSO discovers that the HM has left the unit, the CSO should discuss the situation with the LHO.

HM not eligible

A HM is not eligible for the PHRS when:

- A HM refuses to submit any of the required eligibility documents
- There is proof that a HM has provided false or misleading information about their personal or financial circumstances and their PHRS is affected (Director is satisfied that intent to defraud the Department is obtained in these cases) [Section 5, Communications], and/or,
- It is the fourth and subsequent month of the LHO's eviction process

A CSO should make every effort to collect all eligibility documents and complete the PHRS assessment before a CSO denies a HM. Further, before a CSO denies a HM PHRS, they must discuss the case with their Supervisor.

At the end of each month the CSO should review with their Supervisor each HM file that has not been assessed for the PHRS. If the CSO has made every effort to contact the HM, and the LHO has sent notification to the tenant, the PHRS file in CMAS should be set to a declined status (declined by client, for example). The HM must be notified, in writing through a formal letter. A copy of this letter must be sent to the LHO and the CMAS attachments under the participants screen must be updated.

Eligibility deadline

A HM can apply for the PHRS at any time and may apply for any previous time period missed. There is no deadline for a PHRS application.

4 Assessment Period

The policy

This section describes the process that must be followed by CSOs when determining what a HM assessment period of monthly, quarterly, semi-annually or annually, should be set at and how to calculate the PHRS for the assessment period.

What it means

Assessment period
There are four different types of assessment periods in which to review the personal and financial status of the HM:

- Monthly – a monthly review
- Quarterly – every three months
- Semi-annual – every six months
- Annual – every twelve months

Determining the assessment period
A CSO, in consultation with the HM, is required to set the initial assessment period, or change the assessment period depending on the HM circumstances. The CSO must make HM aware that they are required to save and provide verification of all income regardless of the assigned assessment period.

There are HM types that **must** be set to a standard assessment period as follows:

Monthly

- Income assistance clients, please note that IA clients who are payrolled should be on the same reporting period in PHRS
- Seasonal workers while they earn income
- Employees who work varied hours and/or regular overtime and have fluctuating income

Quarterly

- Seasonal workers with no earnings
- A full-time postsecondary student in a program less than 6 months

Semi-annually

- Employment Insurance recipients
- Regular salaried employees
- A full-time postsecondary student in a program or more than six (6) months

Annually

- Persons with disabilities who live alone and whose only source of income is derived from a disability pension as defined in Appendix 1 or who live with another person(s) whose income is also non-assessable
- Seniors who live alone or with other seniors
- Seniors who live with children attending elementary or secondary school
- High income earners paying maximum rent
- Self-employed persons

It is very important for the CSO to remind the HM that they must save all of their income information, as it will be used to ensure that the HM PHRS and rent payable are accurate.

Should the financial circumstances of a HM change (either increase or decrease) this change must be reported to the CSO. The PHRS will be amended to reflect the HM income change and the CSO will determine if the reporting period remains applicable.

The HM must be informed of their obligation to report changes at the onset of being placed on a non – monthly reporting period.

Calculating income for an assessment period

For all assessment periods, the prior month's income **must** be used. This means that income for February 2008 would determine the amount of rent a HM would pay for the following assessment periods:

- March 2008 (monthly)
- March to May 2008 (quarterly)
- March to August 2008 (semi-annually)
- March 2008 to February 2009 (annually)

When using the prior month's income to determine one of the four assessment periods, include all income of the HM. A HM whose income varies from month-to-month must continue to be assessed monthly.

Options for reporting

For the HM that is required to apply and provide required documents monthly for the PHRS, the CSOs must provide the following options for reporting:

- Mail or fax in all required documents
- Drop off (CSOs must set up a drop-off box)
- Email and scan in signed documents, or,
- Make an appointment

Different assessment periods for HM in the same Household

In situations where multiple HM reside in one unit, assessable income may differ between HM therefore the CSO may be required to assess individual HM on different reporting periods.

Why collect both assessable and non-assessable income

The Core Need Income Threshold (CNIT) is a total of both assessable and non-assessable income and is used by the LHO to determine if the HM is eligible for other NWTHC programs that enable a HM to become homeowners. Please refer to the NWTHC's website at http://nwthc.gov.nt.ca/programs.html for further information.

5 Assessing Income

The policy

This section describes the process that must be following by CSOs when assessing HM for eligibility under the PHRS program. CSOs must use Appendix 1 as their guide for determining what income is assessable or non-assessable.

What it means

A HM PHRS is based on total gross, assessable income within the household.

HM income categories
There are different HM income categories, and each category must be assessed differently by the CSO

Elementary or secondary students
All income of a child that is an elementary or secondary student, attending school on a full or part-time basis, is non-assessable.

Effective February 2009, all income of an adult student attending elementary or secondary studies on a full-time basis is non-assessable.

15 to 18 year old not attending elementary or secondary school
All income of a child who is 15 to 18 years of age and is not attending elementary or secondary school is assessed using the income definitions outlined in Appendix 1.

Income assistance clients
The income assistance a HM receives is non-assessable. Where all HM receive income assistance as their sole financial support, the household is fully subsidized and the rent per public housing unit is set at $32. This means that only one of the HM should receive and pay the $32 to the LHO. The other remaining HM would not receive a shelter allowance from income assistance.

Income assistance top-up clients (PHRS adjustment)
When one or more of the HM is receiving a top-up from income assistance, and has income as outlined in Appendix 1, the HM rent payable and PHRS amount will vary.

Postsecondary students – full-time
All income of a full-time postsecondary student is non-assessable. This includes the money they receive to attend full-time studies, and the money they earn during school

or between semesters. The period between semesters must not be longer than five (5) months.

Postsecondary students – funded by an employer
The income a full-time adult student receives from their employer to attend postsecondary, as a full-time student, is assessable.

Postsecondary students – part-time
All income of a part-time postsecondary student is assessed, as defined in Appendix 1.

The income received by an adult to participate as a part-time postsecondary student is non-assessable. All other money, such as employment earnings the part-time adult student receives is to be considered as outlined in Appendix 1.

Postsecondary students – apprentices
While attending technical training, the income received from EI Part 1 by an apprentice will be considered non-assessable. The income received by an apprentice before the start date of the course, or after the end date of the course will be assessed according to Appendix 1.

Seniors
All income received by a senior is non-assessable. However, when one or more of the HM is not a senior and is receiving income as outlined in Appendix 1.

The month after the senior turns 60 years of age is the first month the senior's income is considered non-assessable.

The month that the senior turns 60 years of age is the first month the senior's income is considered non-assessable.

Persons with disabilities
The income a HM receives for their disability is non-assessable and the rent the HM pays is set at $32. The $32 is per public housing unit. This means that only one of the HM should receive and pay the $32 to the LHO.

When the HM receives income other than for their disability or if one or more of the HM is not a person with a disability, and is receiving income as outlined in Appendix 1, the HM rent payable and PHRS amount will vary.

Caregiver
All the income a live-in caregiver receives for the care giving must be recorded, but is non-assessable.

Determining what month to count pay
The date on the cheque stub determines the month the income should be assessed in.

Assessing a newly allocated unit
A CSO should make every effort to assess a new HM immediately as the LHO will not release the keys to the HM unless those eligible for the PHRS have been assessed and the LHO has been informed of the assessment.

The LHO may choose not to sign a lease with a new tenant who has not completed a PHRS application and been assessed. In this case the CSO may accept in writing from the LHO a letter stating that a new lease will be signed and includes a list of household members. The CSO may then proceed with the PHRS application (all other required information is still necessary to process the application). The LHO should provide the lease within 5 working days (any exception must be discussed with the Supervisor).

Should the lease not be provided within the allotted time, the CSO must contact the LHO to verify the reason. If the lease has not been signed and the tenant will not be moving in, the PHRS assessment in CMAS must be end-dated and no further assessments will be completed until the lease has been provided.

Income of a moving in/out HM – unit already occupied
When a HM moves in/out of a unit, the income is automatically pro rated by CMAS based on the end, or beginning date, the CSO enters under participant in CMAS.

Pro rated payments – newly allocated units
In the case of the PHRS, pro rate means to count only the days the public housing unit was occupied by a HM. In these types of cases, the PHRS should be pro-rated based on the HM move in date. *For example, if the move in date is March 16, the PHRS will be pro rated for the period March 16 to 31 (this calculation in automatically completed by CMAS). The move in date and the start date of the lease will be the same.*

Pro rated payments – moving units
In cases where the HM is moving from one unit to another throughout the month, the CSO must complete a PHRS assessment for both units on a prorated basis. *For example, if a HM changes units on the 5th of the month, the PHRS must be completed for the 1st – 5th for unit 1 and the 6th to the end of the month for unit 2*.

Three-month mobility clause HM
When one or more HM has left the community under the three-month mobility clause, reassess the HM PHRS based on the expected income of the months they are going to be away. *For example, a HM is going to school in Alberta for May and June and will be receiving a reduced salary from their employer. Reassess their May and June's rent based on the reduced salary. When the HM returns, they must supply their actual*

salary and, as mentioned in Section 6, Adjustments, the CSO will reassess based on actual salary when the HM returns.

The HM may also choose to provide income information to the CSO while they are away and change their assessment period to monthly and regularly fax the income information to the CSO.

Caretaker Units

Effective April 1, 2007 38 Assisted Living and 7 Seniors Caretaker units were removed from the public housing inventory and these units are not eligible for the PHRS.

If a HM resides in a caretaker unit, CSOs must confirm with the LHO whether the HM is eligible for PHRS prior to completing the assessment.

Note

1. To avoid rent credits and invoicing, it is very important for the CSO to remind the HM to report any changes in HM income within the month that the change takes place.

6 Adjustments

The policy

This section sets out the procedure for adjusting the PHRS when new, correcting, or false information comes to the CSO's attention or when the income changed within a previous assessment period.

What it means

CSO or HM error
From time to time, HM may provide new information, information they have forgotten to provide previously, or the CSO may discover information that a HM may have neglected to provide. Conversely, a CSO may make a mistake and not correctly consider personal or financial information a HM has provided.

Student status changes
A HM may change their postsecondary student status from full- to part-time or decide to return or not return to school. When this change takes place, the CSO adjusts as follows:

- If a postsecondary student changes from full-to part-time, the income of the HM earned from the date the HM became part-time is assessed as in Appendix 1
- If a full-time postsecondary student does not return to school after a break between semesters, the income the HM earned from the end date of the semester is assessed as in Appendix 1

Reassessment of a prior period
Reassessment of a prior period **must** be done for all quarterly, semi-annually and annual HM. When a HM returns to apply for their new assessment period, the HM provides all prior income information to the CSO for the previous assessment period and the CSO enters all the actual information into CMAS.

If the income that was previously data entered for the assessment has changed, it is necessary to process an adjustment. If it has not change, no adjustment is necessary.

If a HM is unable to provide all of their income information, the CSO has the authority to contact the HM employer. The CSO may also ask the HM to contact their employer to obtain the income information.

All prior income information must be data entered into CMAS before a new assessment can be completed for the HM.

Changes during a current assessment period

A HM can declare income at any time during an assessment period and must be encouraged to do so. *For example, a HM is on a semi-annual assessment period and in the fourth (4) month the HM receives a bonus from their employer. The HM can meet with the CSO and adjust the PHRS for the fourth (4) month. The first, second, third, fifth and sixth month in that assessment period will remain the same.*

False or misleading information

If the HM provides false or misleading information, the CSO should:

- Obtain and use correct information to re-calculate the prior, current and future subsidies, and,
- Report the incident to the Supervisor

The Supervisor should report the incident to the Regional Superintendent (if applicable) and to the Director of Income Security Programs. The report should include the following:

- Name and personal information of the HM
- A description of what took place (how, when, where, etc.)
- What financial loses have occurred as a result of the incident
- Whether or not these losses can be recovered

The Director will report the incident to Senior Management and the Comptroller General

Adjustments in CMAS

A CSO must inform their Supervisor and correct the HM PHRS assessments for 1 to 5 above by:

- Entering the new information into the matching month (October income belongs in the month of November)
- Print off the revised Household Subsidy Summary Report (HSSR)
- Provide the HSSR to the HM and the LHO immediately
- Enter notes in CMAS describing the incident

The LHO will make the adjustments to their payable accounts and credit or debit the clients account.

When HM (excluding the primary lessee) move out of the unit

When a HM leaves a pubic housing unit, do not delete the HM, just end date the HM in CMAS. When a HM moves to another unit, end date the HM in the old unit and add the HM to the new unit.

Annual reports

Each year, the Director will provide a report to the Regional Superintendents, HQ staff, the NWTHC, and the LHO that outlines the number, type and total of all PHRS adjustments (this report may include other details).

7 Communications

The policy

In order to ensure the PHRS program operates smoothly and consistently across the Northwest Territories, appropriate information to deliver the PHRS program must be shared by Income Security Staff, NWTHC staff, and the LHO.

Any concerns regarding communication procedures must be directed to the CSO's Supervisor.

What it means

Information flow

The LHO must work with the CSO and:

- Inform the CSO when an undeclared or new HM moves into, or has left, the public housing unit. Provide new leases initially and as leases expire. Advise the CSO immediately if the HM has left the unit for a short-term period under the Mobility Clause [Section 3, Eligibility], permanently, or moved to another unit temporarily or permanently, or is being terminated, and if a HM is deceased
- If the PHRS is adjusted by the CSO, the LHO will adjust the HM payable rent and either issue a credit or invoice to the HM for the difference
- Inform the CSO of units that are being renovated or removed from the stock

The CSO must work with the LHO and:

- Provide all new or revised PHRS assessments immediately
- Advise the LHO when an undeclared or new HM moves into, or has left, the public housing unit
- Advise the LHO when they are going to be out of the office
- Ensure a monthly meeting is held by the 15th of each month with the LHO to discuss topics such as, CMAS data, adjustments, HM arrears or HM at risk, roles and responsibilities of the CSO and LHO, etc.

The CSO must work with the HM and:

- Explain the content and purpose of all PHRS documents related to the PHRS assessment
- Advise of follow-up review schedules, verbally and in writing
- Issue the letter available in CMAS that reminds the HM to apply for the PHRS on the 15th of the month if they haven't already done so
- Issue the letter available in CMAS that informs the HM that their subsidy file has been closed, and unless they reapply they are responsible for the full rent on the unit (letter is currently in draft)

- Remind the HM that they must report changes in income immediately
- Remind the HM to pay their rent
- Advise HM of eligibility for other Income Security Programs
- Provide language interpretation when language and understanding by the HM is a barrier by obtaining an Interpreter to assist the HM with the PHRS process

A HM must work with the CSO by:

- Initiating the PHRS application process
- Providing all documents necessary for the application
- Informing the CSO of any changes to personal or financial information immediately
- Scheduling return appointments for PHRS reviews

Home visits to public housing units

The CSO may be required to make home visits to complete a PHRS assessment when factors such as illness, disabilities, physical limitations or extenuating circumstances prevent the HM from going to see the CSO.

A CSO must not make a home visit alone. Refer to the Supervisor regarding home visits or contact the LHO and ask for an employee of the LHO to accompany the CSO.

Outstanding documents - LHO

When there is an outstanding document from the LHO, the CSO should wait five (5) working days for the LHO to provide the document. However, if the document affects the PHRS, like a lease agreement, and it has not been provided, the CSO should contact the LHO immediately. If the document does not affect the PHRS, continue to provide the PHRS.

Outstanding documents - HM

When a HM has not provided the documents the CSO requires to complete the PHRS and five (5) working days have passed since the HM was asked, the officer should contact the HM by telephone, fax, and email or through the LHO. If the CSO is unsuccessful at obtaining the document from the HM after three (3) documented tries, which includes the letters issued on the 15th and the 30th of each outstanding month and at least one other means of communication, such as telephone calls, e-mails, etc. that are documented in CMAS attachment notes. The CSO should consider the PHRS to be “Declined by Client” in CMAS and inform the LHO and HM, in writing, that the HM has been marked as “Declined by Client” for receiving the PHRS.

Confidentiality

Both the Statement of Authorization signed by the HM, as well as the Information Sharing Agreement signed by the Department and the NWTHC, outlines the types of information that can be shared with regards to the PHRS, without repercussions to the CSO, Regional Staff and/or the Department.

The type of information that can be shared must be related only to the HM. *For example, information regarding the PHRS on what verifications are outstanding, who resides in the unit, what income has been earned, etc., would qualify as information that can be shared.*

The type of information that must not be shared would be unrelated to the PHRS program. *For example, there is no need to share with the LHO the fact that a HM did not show up for their income assistance appointment.*

A CSO must adhere to the government's employee Terms of Employment as well as the CSO's Code of Ethics when delivering the PHRS program.

8 Service Management

The policy

The Service Management approach ensures that the HM accesses the necessary resources and services that he/she requires to continue to pay his/her portion of the rent while working towards self-reliance in home ownership.

What it means

The HM shall:

- Collaborate with his/her CSO, and
- Acknowledge his/her circumstances

The CSO shall:

- Network with community organizations to learn about the programs, resources, services and opportunities that are available to the HM
- Familiarize themselves with other programs, resources, and services that will help the HM
- Have HM-helpful resources in the office
- Comply with ATIPP by respecting confidentiality and privacy
- Work as a team with other programs, resources and services including:
  - LHO
  - Career Development Officers, and/or
  - Employment Development Officers
- Be watchful and proactive in terms of unpaid rent issues, and
  - If rent is unpaid, the CSO shall:
    - Respond as quickly as possible
    - Meet with the LHO and HM (if present) to discuss unpaid rent issues, and
    - Consider the situation and be aware of setbacks if the HM does not follow through

9 Verification

The policy

This section outlines what a CSO must do to verify gross assessable and non-assessable income, as outlined in Appendix 1, for the purposes of calculating the PHRS.

Instructions on how to reassess a prior period are outlined in Section 6, Adjustments.

What it means

All income, assessable and non-assessable, must be collected and verified by the CSO.

Remember, determining whether a HM is still eligible for a public housing unit is solely the responsibility of the LHO. The CSO determines eligibility for the PHRS.

Authority to verify
The Statement of Authorization, form PHRS-01A and PHRS-01B, provides the CSO and HQ with authority to obtain HM information and to verify gross income and personal information.

Information on salary can be accessed from the HM or directly from the source.

The CSO should discuss concerns they have with HM personal and financial information with their Supervisor.

When to verify
Appendix 1 guides the CSO in verifying assessable or non-assessable incomes reported on forms PHRS-01A and PHRS-01B.

Gross income should always be verified when the following occurs.

- HM applies for the first time
- A change in income (increase or decrease) is reported
- If the CSO is concerned about what the HM is reporting, and/or
- If requested by the Supervisor, Department, LHO or NWTHC

What not to verify
The CSO must not ask for, or verify HM financial information from the following sources:

i. Bank statements
ii. Retirement Savings Plans
iii. Investments

Bank balances are not used to determine the PHRS. CSOs must use official documents such as pay stubs to verify HM income information.

Clientcheck

The clientcheck service is a verification process operated by HQ to verify all Income Security Program information, including HM information.

All requests for the information listed below must be in writing (email or fax) and sent to:

- **Email: Clientcheck@gov.nt.ca**
- **Fax: 1-867-873-7240**

New CMAS entries

- Name (given, middle and surname)
- Date of birth (yy/mm/dd)
- Social insurance number
- Health care number (not required for newborns)
- Mailing address
- Previous provincial/territorial health care number
- Alternate identification (maiden, previous or alternate name)

Adding or removing a unit in CMAS (data entry completed at HQ)

When adding or removing a unit in CMAS, the following must be sent to clientcheck in writing at the address or fax number noted previously (this information is provided by the LHO):

- The community
- The unit number
- The type of unit (apartment, duplex, house, etc.)
- The unit's address, if applicable
- The unit's number of rooms
- The monthly, unsubsidized rent amount (full rent)
- The start date (the date the unit is added to the NWTHC's inventory)
- The date the unit was removed (the date the unit is removed from the NWTHC"s inventory)

Pension enquiry

- Indicate type of benefit (old age security, spousal allowance, guaranteed income supplement, widows, orphans, survivors or disability)
- Name (given, middle and surname)
- Date of birth (yy/mm/dd)
- Social insurance number
- Survivor's benefits - deceased's name (given, middle and surname) and social insurance number
- Full mailing address

Employment insurance

- Name (given, middle and surname)
- Date of birth (yy/mm/dd)
- Social insurance number
- CMAS case number

Maintenance enquiry

- Client's name (given, middle and surname)
- Client's date of birth (yy/mm/dd)
- Every child's name (given, middle and surname)
- Each debtor(s)'s name (given, middle and surname) - if you know the name

Worker's compensation

- Name (given, middle and surname)
- Date of birth (yy/mm/dd)
- Social insurance number
- A description of why and what you are enquiring about

Employment Agencies or Suppliers

- Business permit or license
- Name of individual (given, middle and surname) or name of company
- Social insurance number if individual
- Business license if company
- Mailing address

Miscellaneous

- Name (given, middle and surname)
- Date of birth (yy/mm/dd)
- Social insurance number
- CMAS case number (if applicable)
- Full mailing address

With all above miscellaneous applicant or recipient information, Headquarters can also look into or verify (in most cases) the following:

- Spouse in the house
- Number of people occupying a unit
- Addresses or phone numbers
- Home or land ownership
- Outstanding debts with GNWT
- Outstanding student loans across Canada
- Other applications to access student grants/loans
- Credit checks
- Record of employment

- Public Housing Rental Subsidy tenant information
- Child(ren)'s resident information
- Status of Plan of Care, foster children or social worker contact (not yet established)
- Income Tax information (not yet established)
- Incarceration information (not yet established)
- GNWT superannuation payments (not yet established)

10 Rent, PHRS formula, and LHO payment

The policy

This section provides a brief description of how the total maximum unsubsidized rent is set, how the PHRS formula is developed, and how the LHO is provided with the subsidy.

What it means

Hard-coded in CMAS
The NWTHC, in consultation with Department, sets the total maximum unsubsidized rent rates for each community based on the community's operating costs that include the analysis of, but are not limited to the following: maintenance, heat, LHO's prior year expenditures, vacancy rates, LHO salaries, etc.

The Department, in consultation with the NWTHC, develops the formula that determines the subsidy. All of the information is loaded into CMAS and is automatically calculated for the CSO.

Entered into CMAS
The Department determines what income is assessable and non-assessable.

The CSO must data enter the HM personal and financial information into CMAS. The financial information should be data entered according to Appendix 1 and some of the types of income are hard-coded into CMAS.

Payment to LHOs

From HM:
The HM is responsible to pay their unsubsidized portion of the rent directly to the LHO.

From ECE to NWTHC/LHOs:
Currently, the LHOs are cash-flowed at a fixed monthly amount beginning in April of each fiscal year. The cash is flowed from the Department, to the NWTHC who forwards the PHRS to the NWTHC district office, who in turn, forwards the money to the this process seems complicated, it is necessary for taxation purposes.

11 Appeals

The policy

This section outlines the appeal process that must be followed when a HM believes the CSO's PHRS decision is incorrect.

What it means

Each individual HM, or the HM as a group, has the right to appeal decisions made by the CSO with regards to their PHRS and to the LHO (landlord) with regards to the public housing unit.

Appeal regarding the PHRS
When a HM disagrees with a CSO's PHRS calculations or has been denied the PHRS, the CSO must issue form PHRS-10, Notice of Adjustment and provide the client with PHRS-11A, Appeal – Supervisors' Review.

Should the HM choose to appeal the decision made by the CSO, the following will take place:

First level

1. The HM has seven (7) days to appeal the CSO's decision in writing
2. The HM may use form PHRS-11A, may send an email, fax, or write a letter addressed to the Supervisor
3. The CSO must assist (when possible) the HM with the completion of their PHRS written appeal
4. Supervisor receives the appeal and arranges for an appeal hearing with one or more Supervisors, the CSO and the HM
5. Appeal must be heard within 30 days of receiving the appeal
6. Count the 30 days starting at the day after the appeal was received
7. Appeal hearing can be in person or by teleconference
8. The HM and CSO are provided with the option to be present
9. The Supervisor responsible for the decision will forward the decision to the HM, HQ and the CSO within five (5) days of making the decision

Second and final level

1. The HM and the Director have seven (7) days to appeal the Supervisor's decision in writing
2. The HM/Director may use form PHRS-12A, may send an email, fax, or write a letter addressed to the Administrative Review Group (located at HQ)

3. The CSO must assist (when possible) the HM with the completion of their PHRS written appeal

4. Administrative Review Group's secretary at HQ receives the appeal and arranges for an appeal hearing with the Administrative Review Group, the CSO and the HM
5. Appeal must be heard within 45 days of receiving the appeal
6. Count the 45 days starting at the day after the appeal was received
7. Appeal hearing can be in person or by teleconference (in person is at the HM expense)
8. The HM and CSO are provided with the option to be present
9. The Administrative Review Group responsible for the decision will forward the decision to the HM, HQ and the CSO within five (5) days of making the decision

Decision's effective date

The CSO's decision remains in effect unless the first level appeal panel varies or reverses the CSO's decision. The decision of the first level appeal panel remains in effect unless the decision of the second level appeal panel varies or reverses the Supervisors' decision. The second level appeal panel's decision is final.

Appeal summary

CSOs are responsible to put together an Appeal Summary document that summarizes the events surrounding the appeal and the reason the client was refused and is appealing. Please refer to Appendix 2.

Appeals regarding the public housing unit

When a HM disagrees with a decision of the landlord, they may appeal to the Rental Officer.

Rental Officer

Separate from the appeal process, a Rental Officer, has specific powers and duties that are designed to resolve disputes between landlords and tenants.

The authority for the Rental Office is established under the *Residential Tenancies Act*. The duties of the Rental Officer are as follows:

- Provide information respecting tenancy matters to landlords and tenants
- Receive and investigate complaints and mediate disputes between landlords and tenants
- Investigate allegations of violations of the *Residential Tenancies Act*
- Issue Notices and Orders
- Enter rental premises after giving reasonable notice, for the purpose of discharging his or her duties, and
- Hold Hearings and determine matters of procedure at Hearings (*Residential Tenancies Act*, Section 74 (1))

Rental Officer's jurisdiction

The Rental Officer does not have jurisdiction within the PHRS program. This means that the Rental Officer cannot order the Department to provide a benefit or service to a PHRS HM.

CSO assisting the LHO

The LHO may ask the CSO to sign a statutory declaration (prepared by the LHO) if the LHO needs proof that a HM did or did not do something that they were required to do that resulted in the LHO's decision to evict the HM. The statutory declaration's information may vary from case to case.

The CSO may also be asked to attend the hearing as a witness. If the CSO feels that they would be in conflict by attending a Rental Officer's hearing, they may also ask their Supervisor or a HQ employee to prepare an email or letter or attend on their behalf to outline the case.

Rental Office's address

The CSO can direct HM to the Rental Office when there is a dispute to the:

- 3rd Floor, Panda II Mall
  PO Box 1920
  Yellowknife, NT, X1A 2P4
  Telephone: 1-867-920-8047
  Toll Free: 1-800-661-0760
  Fax: 1-867-873-0489

12 Records

The policy

This section outlines how CSOs must maintain a PHRS paper file and the corresponding computer records.

What it means

All types of information, emails, notes, sticky notes, conversation, documents, etc., regarding a HM is considered a record. It is important for the CSO to keep the records, filed, organized and confidential and to ensure that the records are accurate and not derogatory in any way.

Paper files
HM records may be established and organized by the name of the HM (primary lessee) or by unit number.

If filed by unit number as HM move in and out of the unit information pertaining to individuals no longer in the unit will have to be removed and filed separately.
Files will need to contain all the necessary signed and completed documents for the PHRS assessment from all HM occupying the unit.

All PHRS contacts and conversations with HM regarding their personal and financial status, must be recorded, dated, and placed in the file.

Organizing a paper file
CSOs are required to use file folders that contain six sections. The folders must be arranged in the following manner and contain prior and current documents:

- Section 1 Lease Agreement and Appendices
- Section 2 Statement of Authorization with HM identification(s)
- Section 3 Correspondence and miscellaneous documents
- Section 4 Appeal information
- Section 5 CMAS notes and notes pertaining to HM
- Section 6 Housing Subsidy Summary Reports and all supporting documents for the assessment period (pay stubs, honorariums, etc.)

CMAS data entry
All information that is contained in the paper files must be accurately captured in CMAS in a timely manner. This includes, but is not limited to, HM personal and financial information, clear and concise notes outlining HM circumstances, etc.

Audits

From time to time, records (paper files and computer data) will be examined by the CSO's Supervisor, Headquarters' staff, or an employee of the Audit Bureau. It is important that CSOs maintain all records in the manner outlined in this section.

Deceased HM

When a HM passes away, the documents must be kept in the file and the HM person status must be set in CMAS to "Deceased".

13 Forms

The policy

This section lists the forms that have been approved by the Director of Income Security Programs and must be used in the delivery of the PHRS program.

What it means

Signing forms
Forms 01A and 01B below must be signed by all HM 19 years of age and older living in the household.

HM who are 18 years of age or younger and are enrolled in an educational institution do not need to sign the Statement of Authorization or any of the other PHRS forms.

Forms 01A and 01B need to be signed when there is a break of one calendar month or more in the HM subsidy eligibility, and must always be signed at least once per year.

Current PHRS forms
The following are the forms available for the delivery of the PHRS program:

- PHRS-01A: HM Members Income Statement and Statement of Authorization
- PHRS-01B: HM Members Income Statement (used for reviews
- PHRS-02: Income Verification
- PHRS-03: Third Party Consent for the Release of Information
- PHRS-04: Self-employment (currently being developed, use income assistance's form NWT8759)
- PHRS-10: Notice of Adjustment
- PHRS-11A: Appeal – Supervisors' Review (First Level)
- PHRS-11B: Decision – Supervisors' Review
- PHRS-12A: Appeal – Administrative Review Group (Second Level)
- PHRS-12B: Decision – Administrative Review Group
- PHRS: Unit Update Form (Used by the LHO to update the CSO on a public housing unit's status)
- File Review: (Under development)
- HRDC: Consent to Communicate Information to a Representative for Old Age Security and Canada Pension Plan recipients

New forms

A CSO, or a regional staff member, must not create forms for use within their community or region without the approval of the Director of Income Security Programs.