

**Applicants' Questions regarding the City of Toronto's Progress Report dated May 19, 2020
Pursuant to the terms of the Interim Settlement Agreement dated May 15, 2020**

- May 22, 2020 -

The terms "Physical Distancing Standards", "Shelter System," "Beds", and "Clients" are intended to refer to the defined terms as set out in the Interim Settlement dated May 15, 2020.

Delays in Achieving Physical Distancing Standards Since May 2, 2020

In its May 2, 2020 letter (attached as Appendix "A"), the City asserted that 319 more people needed to be relocated in order to achieve Physical Distancing Standards across the shelter system, and that these relocations would be completed by May 15, 2020. The May 19, 2020 Progress Report indicates that as of May 18, 2020, relocation of 131 individuals from 15 different sites is required in order to achieve Physical Distancing Standards across the shelter system.

1. Please provide an explanation as to why the City's previously stated plan of achieving compliance with Physical Distancing Standards across the shelter system by May 15, 2020 was not in fact achieved. Please include explanation in respect of each of the 15 sites where compliance with Physical Distancing Standards had not been achieved as of May 18, 2020, as to why the City was unable to achieve compliance for that site by May 15, 2020, as had previously been anticipated. For each of these 15 sites, please also explain why the relocation plans could not be effected earlier than the dates indicated in Table B of the Progress Report dated May 19, 2020.
2. With respect to the 15 sites where compliance with Physical Distancing Standards had not been achieved as of May 18, 2020, please advise of the number of residents in each of those sites that had been identified through the risk stratification CARE program as requiring minimum support in the context of relocation to an alternative site. If any of the 15 sites had one or more residents as of May 15, 2020 that had been identified as requiring minimum support, please explain why these residents had not been relocated to an alternative site prior to May 15, 2020, so as to enable compliance with Physical Distancing Standards to be achieved more rapidly.

1. **Answer:** The reporting agreed to under the Interim Agreement is to provide the Applicants with information on the progress the City is making toward achieving the goal of physical distancing as of the date of the Progress Report and explanations regarding any anticipated dates set out in the previous Progress Reports that are not met. Questions arising about the movements of spaces that arose prior to the commencement of the reporting are not questions that arise out of the Progress Reports.

Explanations have been provided in the May 25 Progress Report as to why the remaining eight sites from the May 19 Report did not meet the anticipated dates. Further explanatory notes are as follows:

- The City is working as quickly as possible with providers to identify options to move clients that respect the dignity, choice and safety of clients.
- St Felix – 25 Augusta and 69 Fraser - Unexpected additional repairs and shortage of trades has delayed moves. Further information is provided below.
- Salvation Army Gateway and Islington – Salvation Army has activated a hotel program and relocated more than 100 clients in a very short period of time. They continued to move clients to this location as rapidly as possible through the course of this past week. Gateway has moved the required clients and has now achieved the target capacity. Islington will move 15 clients by this

weekend and is on track to achieve the target capacity. These updates will be reflected in the Progress Report for this Monday.

- Horizons for Youth and Youth Without Shelter - Providers have raised concerns that moving vulnerable youth to a hotel program in an unfamiliar location without continuity of their supports and social networks may present significant risks to their well-being. Conversations with the shelter provider are ongoing to identify solutions that meet the unique needs of vulnerable youth in this program.
- Cornerstone Place - Clients were identified for referral to available hotel spaces. Staffing supports were secured. There is a potential positive case identified at the target hotel site and we are waiting on TPH guidance before commencing movement of the remaining 5 clients. An update on this site will be included in next Progress Report.

2. **Answer:** For the same reasons as set out in answer 1, this is not a question that arises out of the Progress Report.

Basis for Determining When Physical Distancing Standards Are Met in Progress Reports

In the City's letter dated May 7, 2020, the City attached a number of spreadsheets that were the basis for the City's determinations of how many beds needed to be removed from each shelter site in order to achieve physical distancing:

"We are providing you with the attached spreadsheets that summarize the process and calculations that staff used to estimate the number of spaces that needed to be removed from each facility in order to provide enough room for physical distancing between the remaining spaces. The square footage of each room within a given facility was calculated and SSHA determined the number of beds that would need to be relocated from each facility by subtracting the required number of beds per bedroom or sleeping area to achieve physical distancing from the actual current capacity number."

The spreadsheets the City provided are attached as Appendices "B" through "E". The spreadsheets disclose that the City calculated the maximum number of beds per room at each shelter site based on the area (length times width) of each room, divided by 74.3 square feet per bed.

3. Please confirm that the target capacities for each shelter site on pages 3-8 of the Progress Report dated May 19, 2020 were determined based on the calculation of 74.3 square feet per bed, as set out in the spreadsheets provided on May 7. If not, please explain how the target capacities were determined.
4. Please explain the methodology by which the City has determined that the measure of 74.3 square feet per bed is sufficient, regardless of room dimensions, room configuration, bed size and other variables, to ensure that the Physical Distancing Standard of 2 metres lateral distancing between beds is satisfied in all cases.
5. What steps if any have been taken by the City to confirm the dimensions of the beds actually in use at each site?
6. Our clients are of the view that, in respect of larger rooms with dormitory-style occupancy, an allocation of 74.3 square feet per bed is inadequate to ensure compliance with the Physical Distancing Standard of 2 metre spacing between beds. In order to begin an assessment of this issue, we have identified within the City's spreadsheets 27 rooms in which 10+ beds are allocated based on 74.3 square feet per bed (each of these rooms is highlighted in the attached versions at

Appendices “B” through “E”). These rooms are located within 15 different shelter sites. With respect to each of these rooms and/or each of these shelter sites, please advise what steps have been taken by the City to confirm that the target capacity identified in the May 7 spreadsheet can be and has in fact been implemented in a manner consistent with compliance with the Physical Distancing Standard (2 metres lateral distance between beds and no use of upper bunks).

Alternatively, in the event that no such steps have been taken in respect of any given room or site, please confirm that the target capacity reported for that shelter site in the Progress Report dated May 19, 2020 reflects the target capacity identified in the May 7 spreadsheet for that site.

3. – 6. **Answer:** For the reasons set out in answer 1, questions regarding the methodology for identifying the original target capacities back in March are not questions that arise out of the Progress Report. Despite this, we are providing the following information, much of which has already been explained to you:

- Target capacities were initially estimated based on the calculations of square footage. This was supplemented by additional information from providers, as well as actual measurements of bed spacing where possible.
- The 74.3 sq ft was a proxy for estimating the number of spaces to be moved.
- The target capacities were an initial estimate that allowed movement of spaces to begin in March and was always intended to be further verified through service provider confirmation and site visits by the SSHA Quality Assurance (“QA”) team once movements were completed. As previously noted, this verification process has been in progress since early April.
- All providers are in the process of verifying that their site capacities meet physical distancing. This is being done by physically measuring the lateral distance between beds. The service provider verification is being further confirmed by site visits by the QA team. These site visits also involve physically measuring the lateral distance between beds.
- We do not have bed dimensions available. As noted above, verification of physical distancing requirements is being done through both service providers and QA teams measuring the lateral distance between beds. The service providers at 13 of the 14 sites you have identified have confirmed they are meeting physical distancing standards. Some have revised their capacities from the original targets and are meeting these new targets. One of these sites has been identified as needing to further reduce capacity from the original target capacity and we will be working with the provider to identify solutions to move those clients. This information will be updated for our next progress report. 6 of those 14 sites have had site visits by the QA team which further confirmed that the sites met physical distancing requirements.

Capacity Targets for 24-Hour Respite

The spreadsheets that the City provided on May 7, 2020 did not include any information about capacity targets for respite sites in order to comply with Physical Distancing Standards. Instead, the City said in its letter: “Please note that these spreadsheets do not include all locations. Some sites, including respite sites and newer locations had capacity targets developed based on information provided directly by sites and through measurement of beds during site visits.”

7. Please provide sufficient information to enable assessment of the sufficiency (in terms of achievement of Physical Distancing Standards) of the capacity targets shown in the May 19, 2020 Progress Report for each of the respites listed on pages 2-8. For any given site, such information could consist of:

- a. The information provided directly by these sites and through measurements of beds during site visits, as referenced in the May 7, 2020 letter; OR

- b. The dimensions for every room occupied for sleeping in each site, the capacity target of that room, and the dimensions of the beds, cots or mats used in that site; OR
- c. Any other information relied upon by the City to determine the capacity target as shown in the May 19, 2020 Progress Report.

7. **Answer:** For the reasons set out in answer 1, questions regarding the methodology for identifying the original target capacities back in March are not questions that arise out of the Progress Report. Service providers are verifying that physical distancing requirements are met at these targets and SSHA is in the process of confirming this information through QA site visits.

Capacity Targets and Compliance with Physical Distancing Standards for COVID-19 Response sites

The Progress Report dated May 19, 2020 does not include the target capacity figures for any of the COVID-19 Response sites (Dixon Hall – 354 George St; Driftwood CC; John Innes CC; Matty Eckler CC; Warden Hilltop CC; Jimmie Simpson CC; Trinity CRC; Homes First Society – 5800 Yonge St. Building B; OOTC 188 Carlton St; Masaryk-Cowan CC).

- 8. In accordance with the requirements of the Interim Settlement, please provide the City’s assessment of the target capacity of each of the COVID-19 Response sites. The Progress Report dated May 19, 2020 has reported that the occupancy figure for each such site as of May 18, 2020 was in compliance with Physical Distancing Standards and that further reduction was “n/a”.
- 9. Please provide information regarding how the capacity targets for each of the COVID-19 Response sites were determined, to enable assessment of whether the capacity targets are sufficient to achieve Physical Distancing Standards. For any given site, such information could consist of:
 - a. The dimensions for every room occupied for sleeping in each site, the capacity target of that room, and the dimensions of the beds, cots or mats used in that site; OR
 - b. Any other information relied upon by the City to determine the capacity target for that site, such that the occupancy figure reported in the Progress Report dated May 19, 2020 was in compliance with Physical Distancing Standards.

8. and 9. **Answer:** These sites do not have target capacities because they did not exist prior to the pandemic. Therefore, there were no required reductions. These sites all meet physical distancing requirements and every cot is spaced a minimum lateral distance of 2m. Actual measurement of cot spacing on site was used, not room dimensions.

Family Sector

The Progress Report dated May 19, 2020 does not disclose target capacity for the following sites in the Family sector: Birkdale Residence; Christie Refugee Welcome Centre; Red Door Family Shelter; Sojourn House; Sojourn House Refugee Family Grange; Toronto Community Hostel.

- 10. Please confirm that for each of these sites, sleeping arrangements are such that each family has its own room and individuals from different households/families are not sleeping in shared rooms. In the event that this is not the case for all such sites, please explain how the City has confirmed that compliance with Physical Distancing Standards has been achieved in respect of that site.

10. **Answer:** Confirmed these locations are family shelters, and rooms are occupied by one family unit or household. One of the family refugee programs also serves single individuals. Where two individuals from different households are in the same room, the service provider has confirmed that the beds meet physical distancing requirements.

Streets to Homes Satellite Interim Housing Program

The Progress Report dated May 19, 2020 does not disclose the capacity or existing occupancy for the Streets to Homes Satellite Interim Housing Program. Under the terms of the Interim Settlement, this program is one of the components of the Shelter System, and therefore subject to the reporting obligations set out in the Interim Settlement.

11. In accordance with the requirements of the Interim Settlement, please identify the different sites making up the Streets to Homes Satellite Interim Housing Program, the number of units and beds at each site, the target capacity of each such unit, and the number of occupants in each such unit.

11. **Answer:** This information was provided on page 11 at row 4 of the Progress Report. There are 125 apartments of a range of unit sizes. Occupancy was 87 individuals as of May 19th and 114 individuals as of May 24th as indicated in both the progress reports and our online occupancy report. The remaining units have been filled this week and occupancy will be reflected in the next Progress Report.

All clients are provided their own units, except in cases where households or couples have requested to share a unit.

Confidential Hotel Locations

The Progress Report dated May 19, 2020 does not disclose the capacity for the hotel rooms that the City has secured for the purposes of achieving Physical Distancing Standards across the Shelter System. Under the terms of the Interim Settlement, these hotel rooms are one of the components of the Shelter System, and therefore subject to the reporting obligations set out in the Interim Settlement.

12. In accordance with the requirements of the Interim Settlement, please identify the capacity of each of the hotels identified on pages 9-11 of the Progress Report dated May 19, 2020.

13. In accordance with the requirements of the Interim Settlement, please identify if any additional hotels have been secured by the City for the purposes of achieving Physical Distancing Standards across the Shelter System, other than those identified on pages 9-11 of the Progress Report dated May 19, 2020. In the event that such additional hotel sites have been secured, please advise of the capacity of each such site.

12. **Answer:** The hotel rooms are contracted on an as needed basis, so the physical distancing site capacity is equivalent to the client occupancy.

13. **Answer:** The Progress Report lists all hotels currently in use to accommodate the required reductions in existing facilities so that these facilities can meet physical distancing requirements.

Relocation Plans for St. Felix Sites

In the May 19, 2020 Progress Report, the City disclosed its plans to move residents from St. Felix's 25 Augusta Avenue and 69 Fraser Avenue sites to meet physical distancing standards, into a new site. According to the May 19, 2020 Progress Report, this new site "required renovations to ensure the site meets all requirements", that such renovations were "underway" and the site "should be ready by early next week".

According to City's outbreak report dated May 20, 2020, there is a known outbreak at one of the St. Felix sites, and this outbreak arose on April 24, 2020.

14. In respect of the residents that the City plans to relocate from the two St. Felix locations in order to meet physical distancing standards, please explain why the City selected a location that required renovation and that was not immediately available, rather than making use of other available Beds, such as vacant hotel rooms within hotel sites that had already been secured by City or Beds within other Shelter System sites that were not operating at target capacity.
14. **Answer:** Moving clients from an active outbreak location to another site with clients from other programs is generally not recommended, so a distinct location for this program was the preferred approach. This was an available downtown facility in relative proximity to the home site and was agreeable to the provider as an appropriate site for their clients. Alternative opportunities continue to be explored should the original facility not be ready in time.
15. What is the configuration of the new site that is undergoing renovations, and in particular, is it a congregate setting with dormitory-style sleeping arrangements? What is the target capacity of this new site, and how has this been determined?
15. **Answer:** It is a low-barrier respite program with shared sleeping spaces that will meet physical distancing requirements. The estimated capacity is 40. The final capacity will be determined once the site is available for set up and configuration.
16. What steps if any have been taken, in planning for relocation of residents from the St. Felix site with a known outbreak, to minimize and prevent risks of transmission of COVID-19?
16. **Answer:** All recommendations from Toronto Public Health developed through their investigation are being followed. Testing has been completed on-site at both locations. Clients continue to be actively monitored for symptoms. Generally, movement of clients from an outbreak location to a site with other clients is not recommended.