

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

- July 27, 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.

Revision to Target Capacity at YWCA Woodlawn

In the City's June 15, 2020 Progress Report, the target capacity of the YWCA Woodlawn shelter for adult women and youth was reported as 34. In the July 15, 2020 Progress Report, the target capacity for this site has increased to 49. In the Applicants' cross-examination of Gord Tanner on July 11, 2020, Mr. Tanner indicated that the reported occupancy for the YWCA Woodlawn shelter at 80 Woodlawn East includes beds actually located in a hotel-based program.

1. Please advise of the date the target capacity increased, the reason for the increased target capacity, and whether Quality Assurance and/or the site provider have confirmed that 2.0 metre lateral separation between beds is being maintained at the current target capacity for YWCA Woodlawn. Please provide any report from Quality Assurance or the site provider.

1. Answer – Clients of this program have moved back into the shelter facility at 80 Woodlawn East. This service provider is no longer operating a hotel program. On June 12, 2020, the service provider confirmed that a target capacity of 49 meets physical distancing standards.

2. The Applicants recently became aware through documents produced on July 15, 2020 in response to undertakings given at the cross-examination of Gord Tanner on July 11, 2020, that the City has used the concept of "longitudinal spacing" to permit beds in Sprung sites (69 Fraser Avenue, 1A Strachan Avenue, and 351 Lakeshore Blvd. E.) to be placed less than 2 metres apart at the head and foot of the bed. Please advise whether any beds at YWCA Woodlawn are placed less than 2 metres apart from the head or foot of the adjacent bed. If there are beds spaced less than 2 metres apart, please advise what the minimum longitudinal spacing between the beds at this site is.

2. Answer – The issue of the spacing between the head and foot of beds is not relevant to the Interim Agreement and therefore this question does not arise out of the Progress Report. The City has determined compliance with physical distancing standards by measuring 2m lateral separation between beds/cots.

3. Please confirm that all 49 beds listed as part of YWCA Woodlawn are located at 80 Woodlawn East, or advise if some of them are actually located in a hotel-based program, the number of beds that are in the hotel-based program, the name and address of that hotel, and the number of beds in the hotel-based program which are occupied.

3. Answer – confirmed all 49 beds are now located at 80 Woodlawn East

4. Please provide the occupancy for this site on a daily basis since June 15, 2020, or confirm that the aggregate total occupancy reported on Open Data for the following programs listed on Open Data accurately represents the daily total occupancy of the site as a whole. The programs reported on Open Data are: a. YWCA - Adult Women Shelter; and, b. YWCA – Youth Shelter.

4. Answer – confirmed that occupancy on Open Data is accurate.

Revision to Target Capacity at Eva's Satellite

In the City's June 15, 2020 Progress Report, the target capacity of Eva's Satellite was reported as 14. In responses to undertakings in the Applicants' motion to enforce the Interim Settlement Agreement, the City advised that the reported target capacity of Eva's Satellite as 14 on June 15, 2020 was an error. In the July 15, 2020 Progress Report, the target capacity for this site has increased to 16.

5. Please advise of the date the target capacity increased, the reason for the increased target capacity, and whether Quality Assurance and/or the site provider have confirmed that 2.0 metre lateral separation between beds is being maintained at the current target capacity of 16 for Eva's Satellite. Please provide any report from Quality Assurance or the site provider.

5. Answer – The service provider has confirmed a target capacity of 16 meets physical distancing standards.

6. The Applicants recently became aware through documents produced on July 15, 2020 in response to undertakings given at the cross-examination of Gord Tanner on July 11, 2020, that the City has used the concept of “longitudinal spacing” to permit beds in Sprung sites (69 Fraser Avenue, 1A Strachan Avenue, and 351 Lakeshore Blvd. E.) to be placed less than 2 metres apart at the head and foot of the bed. Please advise whether any beds at Eva's Satellite are placed less than 2 metres apart from the head or foot of the adjacent bed. If there are beds spaced less than 2 metres apart, please advise what the minimum longitudinal spacing between the beds at this site is.

6. Answer – see answer to Q. 2

7. Please provide the occupancy for this site on a daily basis since June 15, 2020, or confirm that the occupancy reported on Open Data is accurate.

7. Answer – confirmed that occupancy on Open Data is accurate.

Revision to Target Capacity at Margaret's 21 Park Road Respite

In the City's June 15, 2020 Progress Report, the target capacity of Margaret's 21 Park Road Respite was reported as 30. In the July 15, 2020 Progress Report, the target capacity for this site has decreased to 25.

8. Please advise of the date the target capacity decreased, the reason for the decreased target capacity at the site, and if the reason for reducing target capacity was due to a site visit by

Quality Assurance or confirmation from the site provider please provide the report from Quality Assurance or the site provider.

8. Answer – This site's target capacity changed from 30 to 25 as a result of both QA and service provider verification. Target capacity was not changed and should have been. Occupancy was reduced to 25 on June 22.

9. The Applicants recently became aware through documents produced on July 15, 2020 in response to undertakings given at the cross-examination of Gord Tanner on July 11, 2020, that the City has used the concept of “longitudinal spacing” to permit beds in Sprung sites (69 Fraser Avenue, 1A Strachan Avenue, and 351 Lakeshore Blvd. E.) to be placed less than 2 metres apart at the head and foot of the bed. Please advise whether any beds at Margaret’s 21 Park Road Respite are placed less than 2 metres apart from the head or foot of the adjacent bed. If there are beds spaced less than 2 metres apart, please advise what the minimum longitudinal spacing between the beds at this site is.

9. Answer – see answer to Q.2

10. Please provide the occupancy for this site on a daily basis from June 15, 2020 to present as it is not reported on Open Data.

10. Answer – see attached.

Revision to Target Capacity at 545 Lakeshore

In the City’s June 15, 2020 Progress Report, the target capacity of 545 Lakeshore was reported as 224. In the July 15, 2020 Progress Report, the target capacity for this site has decreased to 173.

11. Please advise of the reason for the decreased target capacity at 545 Lakeshore, and if the reason for reducing target capacity was due to a site visit by Quality Assurance or confirmation from the site provider, the date on which the change to target capacity was made and the report from Quality Assurance and/or the site provider.

11. Answer – The service provider requested a target occupancy of 173. Occupancy has remained below 173 since June 15.

12. The Applicants recently became aware through documents produced on July 15, 2020 in response to undertakings given at the cross-examination of Gord Tanner on July 11, 2020, that the City has used the concept of “longitudinal spacing” to permit beds in Sprung sites (69 Fraser Avenue, 1A Strachan Avenue, and 351 Lakeshore Blvd. E.) to be placed less than 2 metres apart at the head and foot of the bed. Please advise whether any beds at 545 Lakeshore are placed less than 2 metres apart from the head or foot of the adjacent bed. If there are beds spaced less than 2 metres apart, please advise what the minimum longitudinal spacing between the beds at this site is.

12. Answer – see answer to Q. 2

13. Please provide the occupancy for this site on a daily basis from June 15, 2020 to

present or confirm that the aggregate total occupancy reported on Open Data for the following programs listed on Open Data accurately represents the daily total occupancy of the site as a whole. The programs reported on Open Data are:

- a. 545 Lakeshore Blvd. W. Men;
- b. 545 Lakeshore Blvd. W. Women;
- c. 545 Lakeshore Blvd W. Men Winter Program Lower Level; and,
- d. 545 Lakeshore Blvd. W. Couple.

13. Answer – confirmed that occupancy on Open Data is accurate.

Revision to Target Capacity at St. Simon's

In the City's June 15, 2020 Progress Report, the target capacity of St. Simon's was reported as 35. In the July 15, 2020 Progress Report, the target capacity for this site has decreased to 30.

14. Please advise of the reason for the decreased target capacity at St. Simon's, and if the reason for reducing target capacity was due to a site visit by Quality Assurance or confirmation from the site provider, the date on which the change to target capacity was made and the report from Quality Assurance and/or the site provider.

14. Answer – the target capacity changed from 35 to 30 as a result of service provider verification. The previous target capacity of 35 was listed in error on the Progress Report. Occupancy has remained at 30 or below since June 15.

15. The Applicants recently became aware through documents produced on July 15, 2020 in response to undertakings given at the cross-examination of Gord Tanner on July 11, 2020, that the City has used the concept of "longitudinal spacing" to permit beds in Sprung sites (69 Fraser Avenue, 1A Strachan Avenue, and 351 Lakeshore Blvd. E.) to be placed less than 2 metres apart at the head and foot of the bed. Please advise whether any beds at St. Simon's are placed less than 2 metres apart from the head or foot of the adjacent bed. If there are beds spaced less than 2 metres apart, please advise what the minimum longitudinal spacing between the beds at this site is.

15. Answer – see answer to Q.2

16. Please provide the occupancy for this site on a daily basis from June 15, 2020 to present or confirm that the aggregate total occupancy reported on Open Data for the following programs listed on Open Data accurately represents the daily total occupancy of the site as a whole. The programs reported on Open Data are:
 - a. St. Simon's Extreme Weather Program; and,
 - b. St. Simon's Shelter.

16. Answer – confirmed that occupancy on Open Data is accurate.

Revision to Target Capacity at Margaret's 323 Dundas Street East Respite

In the City's June 15, 2020 Progress Report, the target capacity of Margaret's 323 Dundas Street East Respite was reported as 25. In the July 15, 2020 Progress Report, the target capacity for this site has decreased to 21.

17. Please advise of the reason for the decreased target capacity at Margaret's 323 Dundas Street East respite, and if the reason for reducing target capacity was due to a site visit by Quality Assurance or confirmation from the site provider, the date on which the change to target capacity was made and the report from Quality Assurance and/or the site provider.

17. The target capacity for this site was changed from 25 to 22, as reflected on the June 1 and June 8 Progress Reports. The target capacity was reduced further to 21 as a result of service provider verification prior to the June 15 Progress report. However, instead of changing the target capacity from 22 to 21 on the June 15 Progress Report, the target capacity was mistakenly recorded as 25. It was subsequently changed on the July 15 Progress Report. Occupancy has been 21 or lower since June 15.

18. The Applicants recently became aware through documents produced on July 15, 2020 in response to undertakings given at the cross-examination of Gord Tanner on July 11, 2020, that the City has used the concept of "longitudinal spacing" to permit beds in Sprung sites (69 Fraser Avenue, 1A Strachan Avenue, and 351 Lakeshore Blvd. E.) to be placed less than 2 metres apart at the head and foot of the bed. Please advise whether any beds at Margaret's 323 Dundas Street East respite are placed less than 2 metres apart from the head or foot of the adjacent bed. If there are beds spaced less than 2 metres apart, please advise what the minimum longitudinal spacing between the beds at this site is.

18. Answer – see answer to Q. 2

19. Please provide the occupancy for this site on a daily basis from June 15, 2020 to present as it is not reported on Open Data.

19. Answer – see attached