

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

- October 26, 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.

Source Information for Target Capacities Reported in the October 19, 2020 Progress Report

1. For each target capacity reported in the October 19, 2020 Progress Report, please identify the information source upon which the reported target capacity is based (whether Quality Assurance visit, theoretical calculation, service provider information, floorplan drawings, or another source) and the date when the information was acquired by the City.
2. In the event that the reported target capacity for any site has been reassessed for compliance with Physical Distancing Standards since June 15, 2020, but that reassessment process did not yield a change in the target capacity for that site (such that the target capacity reported in the October 19, 2020 Progress Report is based upon and reflects the reassessment), please advise of the nature of the reassessment that was undertaken and the date when this reassessment occurred. For example, see paragraph 32 of the City's factum filed on the enforcement motion.
3. For each target capacity reported in the October 19, 2020 Progress Report, please provide the source information upon which the reported target capacity is based, as identified in Questions 1 and 2 above. In the event that the source information in respect of any target capacity figure reported in the October 19, 2020 Progress Report has already been produced to the Applicants, please identify the documents in question.

Instructions to Quality Assurance Teams Applicable at the Dates when Reported Target Capacities Determined

4. For all sites in respect of which Quality Assurance staff were involved in the determination of the target capacity reported in the October 19, 2020 Progress Report, please provide the instructions that applied to or guided the work of Quality Assurance staff in respect of ensuring compliance with Physical Distancing Standards, as of the date(s) identified for each such site in response to Questions 1 and/or 2 above.
5. Ms. Franz's letter of October 19, 2020, which accompanied the October 19, 2020 Progress Report, indicated that target capacities for six sites (Christie-Ossington Men's Hostel 850 Bloor St.; Cornerstone Place 616 Vaughan; Dixon Hall Heyworth House 2714 Danforth Avenue; Fred Victor Women's Drop-In 67 Adelaide St. E.; Salvation Army Evangeline 2808 Dundas St. W.; and Scott Mission 502 Spadina Avenue) had changed,

as compared to the August 15, 2020 Progress Report, as a result of the Phase II Quality Assurance process that was completed for these sites between August 15, 2020 and October 19, 2020. Please provide the instructions applicable to this Phase II Quality Assurance process.

6. To the extent that these instructions have not already been provided in response to Questions 4 and 5 above, please provide the current instructions that apply to or guide the work of Quality Assurance in respect of ensuring compliance with Physical Distancing Standards.

Site dimensions, floorplans and building records

7. For some of the shelter and respite sites, the City has provided scale floorplans to the Applicants, but such records have not been provided for all sites included within the October 19, 2020 Progress Report. The Applicants are in the process of identifying the shelter and respite sites for which scale floorplans have not been provided to date, and will provide this list to the City as soon as it is available. To the extent that scale floorplans are maintained and readily available to the City in respect of any of the shelter or respite sites included in the October 19, 2020 Progress Report and such scale floorplans have not been disclosed to the Applicants to date, please provide them.
8. For some of the shelter and respite sites, the City has provided to the Applicants floorplans identifying the placement of beds/cots so as to achieve compliance with Physical Distancing Standards. Such floorplans have not to date been provided for all sites included within the October 19, 2020 Progress Report. To the extent that such floorplans have been prepared by the City in respect of any of the shelter or respite sites included in the October 19, 2020 Progress Report and have not been disclosed to the Applicants to date, please provide them.

Questions about Specific Sites

9. Ms. Franz's letter of October 19, 2020, which accompanied the October 19, 2020 Progress Report, indicated that target capacities for six sites (Christie-Ossington Men's Hostel 850 Bloor St.; Cornerstone Place 616 Vaughan; Dixon Hall Heyworth House 2714 Danforth Avenue; Fred Victor Women's Drop-In 67 Adelaide St. E.; Salvation Army Evangeline 2808 Dundas St. W.; and Scott Mission 502 Spadina Avenue) had changed, as compared to the August 15, 2020 Progress Report, as a result of the Phase II Quality Assurance process that was completed for these sites between August 15, 2020 and October 19, 2020. Please provide the Quality Assurance documentation (including PDSA form and CheckMarket report) for the Phase II Quality Assurance assessments of these six sites.
10. With respect to the Salvation Army Evangeline site, Mr Tanner stated, in his cross-examination on September 10, 2020, that the target capacity for this site that was considered by SSHA to be compliant with Physical Distancing Standards was 68. On the

October 19, 2020 Progress Report, the target capacity for this site is reported as 49. Please explain the reasons for the reduction in the target capacity reported for the site.

11. With respect to the Cornerstone Place site, please provide a copy of the documentation regarding the service provider confirmation upon which the reported target capacity of 20 is based. In the event that this documentation has already been produced to the Applicants, please identify the documents in question.
12. With respect to the Na-Me-Res site, please provide:
 - a. a copy of the documentation regarding the service provider confirmation provided on June 23, 2020 confirming a target capacity of 36 for this site;
 - b. a copy of the documentation regarding the later service provider confirmation and/or QA assessment confirming a target capacity of 41 for this site, as reflected in the answers to undertakings provided by the City on September 17, 2020 (UT#11);
 - c. an explanation for the reasons for the reduced target capacity of 36 reported for this site as of the October 19, 2020 Progress Report.
13. With respect to the St Felix 25 Augusta site, please provide a copy of the documentation regarding the service provider confirmation and/or QA assessment confirming a target capacity of 19 for this site.