



# **ADDRESSING VETERAN HOMELESSNESS IN CANADA**

By Taylor Chase, Alison Clement, Sandrine Desforges and Anmol Gupta

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Finally, this report was developed at the Max Bell School of Public Policy, situated on the campus of McGill University. McGill University is located in Tiohtiá:ke, Montréal, which is the unceded, traditional territory of the Kanien'kehá:ka. This land has historically served as a site of meeting and exchange amongst many First Peoples, including members of the Haudenosaunee and the Anishinabeg nations. We acknowledge the complex relationship between education, public policy, and systemic oppression throughout history and in contemporary times. Furthermore, we recognize the distinct challenges that Indigenous veterans have encountered, enduring discriminatory treatment both during and after service, and their significant yet often overlooked contributions to Canada's military. We want to extend a special thank you to the First Nations, Inuit, and Métis organizations who took time to meet with our team to help us gain a deeper understanding of the realities and needs of Indigenous veterans.

### *Disclaimer*

This document has been authored by a team of graduate students from McGill University's Max Bell School of Public Policy as a requirement for the completion of the Master of Public Policy program. The views and opinions expressed in this document do not represent those of McGill University, the Max Bell School of Public Policy, the Office of the Federal Housing Advocate, the Canadian Human Rights Commission, or any other organizations and individuals consulted during its development.

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## EXECUTIVE SUMMARY

*This report has been prepared for the Office of the Federal Housing Advocate (OFHA) as part of a capstone project for the Max Bell School of Public Policy at McGill University. The OFHA has tasked the authors of this report with answering the following question: “**What federal policies and programs are needed to ensure meaningful reductions in veteran homelessness and advance the right to adequate housing for all veterans in Canada?**” This report is designed to provide policy options that the FHA can directly recommend to all relevant federal departments.*

Among people experiencing homelessness, veterans represent a distinct group of individuals with unique needs and challenges. Veterans are two to three times more likely to experience homelessness compared to the general population and are disproportionately represented among individuals experiencing homelessness. The estimated number of unhoused veterans across Canada varies greatly from 2,400 to over 10,000. While this issue is not unique to Canada, countries like the US have made significantly more progress in reducing the number of veterans experiencing homelessness.

More broadly, the federal government’s approach to housing is evolving. In 2017, Canada adopted the National Housing Strategy (NHS), an \$82+ billion ten-year strategy to implement a human rights-based approach that realizes housing as a fundamental human right and recognizes veterans as a key priority group. Now, with the federal government entering the sixth year of its ten-year strategy, Canada is at an inflection point. With a growing national housing affordability crisis and little evidence of meaningful reductions in homelessness, programs under the NHS are increasingly inadequate. To its credit, the federal government has continued to build upon the NHS to fill growing policy gaps, especially for more vulnerable groups. Earlier this year, the federal government released a \$79.4 million Veteran Homelessness Program, establishing two funding streams to support civil society and subnational governments to provide rent supplements, deliver social services, and improve research.

Despite this new announcement, the federal government needs to take more action. With fragmented and siloed programs across the country, poor understanding of the scale of the issue, and the incredibly diverse nature of the causes and experiences of veteran homelessness, it is not clear that more money – without clear federal leadership and coordination – will bring about meaningful change. And, with the growing housing crisis across Canada, more veterans will disproportionately fall into homelessness should the federal government not take a more proactive and human rights-based approach to this issue. As a result, there remains great interest from many stakeholders – including the government’s housing watchdog the Federal Housing Advocate (FHA) – to identify current deficiencies and develop innovative federal policies that can better enshrine the right to adequate housing for Canadian veterans.

The FHA is an independent, nonpartisan watchdog responsible for making policy and program recommendations to different levels of government that advance the right to housing. However, the FHA does not have legislative power to independently create or change housing laws. **This report is designed to provide policy options that the FHA can directly recommend to all relevant federal departments.**

The FHA adopts a human rights-based approach (HRBA), which focuses on advancing the rights of those who are marginalized, excluded, or discriminated against. Principles of a HRBA include the right to self-determination, the right to participate in decision-making processes, as well as substantive equality, non-discrimination, progressive realization, and accountability.

HRBA places people at the center of policy objectives. The recommendations proposed are grounded in these principles.

### *Methodology*

This report is based on extensive research, which included a comprehensive review of academic and gray literature, a close examination of relevant domestic and international legal obligations, and in-depth interviews with 32 stakeholders between January and June 2023. Stakeholders represented a wide range of expertise, including government entities, Crown corporations, national Indigenous organizations, human rights experts, and veteran and homelessness-serving organizations. The findings from this research are used to inform the comprehensive policy recommendations to follow. Several of the policy recommendations were “tested” with stakeholders in secondary interviews to assess for relevancy and feasibility.

### *Key findings*

1. **There remains a lack of federal departmental leadership on the issue:** No single federal department or agency is tasked with upholding the right to housing for veterans; instead, several federal players are involved, including Infrastructure Canada, Veteran Affairs Canada (VAC), the Canadian Armed Forces (CAF), and Canada Mortgage and Housing Corporation (CMHC), without clear government responsibility. With various civil society programs and jurisdictional challenges on housing across the country, there is a need for federal leadership to support and coordinate a national approach to veteran homelessness.
2. **There are significant discrepancies in the reported numbers and identities of veterans experiencing homelessness:** Estimates of the number of unhoused veterans vary greatly from government and civil society stakeholders, ranging from 2,400 to over 10,000. The nature of veteran homelessness makes it particularly challenging to quantify as many veterans experience ‘hidden homelessness’, such as couch-surfing or living in vehicles. Many veterans seldom interact with services, such as shelters and food banks, which serve as the most common data collection sites. While the government has created and implemented the Homeless Individuals and Families Information System (HIFIS) for local communities to collect real-time information on their unhoused populations, the data collected is inadequate to meaningfully understand the scope of homelessness among veterans.
3. **Former CAF members who do not meet Canada's definition of a veteran are exposed to additional risks of experiencing homelessness:** Not all former CAF members can equally access the benefits and services provided by VAC. This is partly attributed to VAC’s definition of a veteran, which excludes those who have been forced to interrupt military training before completion due to illness or injury or who have been discharged non-honourably. Historically, some individuals have even been dishonourably discharged from the forces for reasons considered illegitimate today. For example, during the ‘LGBT Purge’, thousands of federal employees were fired because of their sexual orientation. Individuals who do not meet the definition may be more likely to find themselves in precarious situations after release from the military, yet their exclusion from the definition directly inhibits their ability to benefit from many VAC services.
4. **Many unhoused veterans are reluctant to self-identify as veterans, hindering the delivery of existing benefits and services:** Negative experiences during time spent in the armed forces, distrust of government, embarrassment or pride, and the perception of not qualifying as a “real” veteran because of a lack of foreign deployment can all contribute to an individual’s reluctance to self-identify. This is a significant barrier in preventing former CAF members from accessing benefits and services.

5. **Services do not meet the needs of women and gender-diverse veterans experiencing homelessness:** Women account for 16.2 percent of the total veteran population; however, they represent 30 percent of veterans experiencing homelessness. The experience of homelessness also looks different for women and gender-diverse individuals: instead of living on the streets and/or accessing shelters, these individuals are more likely to be couch surfing or in transactional relationships – such as staying with someone in exchange for sex. Available services, from VAC benefits to homeless shelters, are typically designed to meet the needs of single males and not women and gender-diverse individuals.
6. **Some individuals entering the armed forces have preexisting risk factors for homelessness:** Those who enlist in the all-volunteer force appear to be at a higher risk for homelessness, due to a social selection effect whereby individuals with particular risk factors for homelessness – including economic insecurity, weak family unity, and limited education – are disproportionately recruited into the volunteer forces.
7. **CAF and VAC inadequately support veterans in their transition to civilian life:** Despite efforts by CAF and VAC to support veterans after their release from service, many challenges persist during veterans' military-to-civilian transition that can exacerbate the risk of experiencing homelessness. Challenges include feeling abandoned by the armed forces after discharge and the loss of sense of purpose and community, leaving the military without transferable skills, poor financial literacy, and delays in transferring health coverage to the civilian public system. Many veterans also experience barriers to accessing VAC benefits because of complicated bureaucratic processes, long backlogs, and delays in reimbursements. Finally, veterans face challenges receiving proper care because many service providers lack military cultural competency.
8. **Veterans-serving organizations (VSOs) face challenges financing the development of veterans housing projects:** Several civil society organizations across Canada specialize in building housing projects designed to meet veterans' unique needs. These projects create communities for veterans that often provide units of a manageable size, on site social supports, and job training. However, these organizations increasingly face challenges securing land to build projects and financial support for operations. Despite programs under the NHS to allocate federally divested lands and funds to support development and operation costs, VSOs find it difficult to compete with larger private developers to secure NHS grants and low-interest loans.

Together, these findings demonstrate the need to holistically address veteran homelessness from three angles: supporting those with preexisting risk factors during their military service, preventing those leaving the armed forces from falling into homelessness, and creating programs that can provide access to housing for all veterans experiencing homelessness. The findings also emphasize the need for policies and programs to consider the diversity of experiences and needs of veterans experiencing homelessness and raise caution about building programs based on generalizations.

The policy recommendations are divided into two sections: foundational and core recommendations. Foundational recommendations identify policies that will shape the government's approach to, and understanding of, the issue of veteran homelessness. Core recommendations aim to create programs that address the acute needs of unhoused veterans, build capacity to realize the right to housing, and adopt a preventative approach for future veterans.

### *Foundational policy recommendations*

**Objective 1: Veterans Affairs Canada to take primary leadership on veteran homelessness.** While addressing veteran homelessness will require a whole-of-government approach, there needs to be a clear governmental lead accountable for enshrining the right to

housing for veterans. Given the distinct needs of veterans experiencing homelessness, VAC is best positioned to implement policies and programs specifically designed to end chronic veteran homelessness. This objective includes three recommendations that advance the principles of accountability and participation and are estimated to cost \$2 million.

Recommendation 1.1 is for the Minister of Veterans Affairs to introduce legislation amending the *Department of Veterans Affairs Act* to explicitly include the responsibility of housing security for veterans. This legislative change will allow the department to implement housing policies for their beneficiaries with clear mandate authority and without question of overreach.

Recommendation 1.2 is for VAC to adopt a preventive approach to service delivery, registering all 337,993 unregistered veterans as members of VAC so that they can easily access benefits should they encounter an acute crisis or precarious housing situation. Registration of all veterans will also allow VAC to foster a sense of community, regularly assess the needs of the entire population, and tailor services accordingly.

Recommendation 1.3 is for VAC to create an advisory council on veterans' housing security that includes civil society partners and individuals with lived experience. This council can be modeled on existing VAC advisory councils on issues of families, mental health, and transition.

**Objective 2: Achieve a shared and accurate understanding of homelessness among veterans in Canada.** The issue of veteran homelessness is marked by a concerning lack of understanding among stakeholders regarding its true scope. This objective includes four recommendations focused on data collection and understanding risk factors related to homelessness. These recommendations advance the principles of non-discrimination, accountability, and prevention, and are estimated to cost \$4.1 million in the first year of implementation, followed by \$1 million per year.

Recommendation 2.1 is for Infrastructure Canada to onboard VSOs onto Homeless Management Information Systems (HMIS) to better capture data on veterans experiencing homelessness. Recognizing that unhoused veterans are more likely to interact with VSOs than traditional service points, such as food banks and shelters, the federal government should work with the 105 identified VSOs to implement HMIS and serve as points of data collection.

Recommendation 2.2 is for Infrastructure Canada to use HMIS to collect additional data that helps identify veterans' risk factors, including rank, release date, and discharge status. Additionally, it is recommended that HMIS allow VSOs, especially those that temporarily or permanently house veterans, to input information about the type and duration of housing for veterans when they interact and stay at their facilities. This type of information will allow the government to understand which veterans are being housed, into what types of housing, and for how long.

Recommendation 2.3 is for the CAF to collect data on preexisting risk factors for homelessness when individuals enter the armed forces. While US literature suggests that many individuals entering the volunteer force have preexisting risk factors, it remains unknown what risk factors are predominant in the Canadian population. Understanding this can help the CAF build programs to better support individuals during their service and reduce their risk of falling into homelessness post-release.

Recommendation 2.4 is for the Veterans Ombuds to investigate the limitations of VAC's definition of a veteran. Individuals excluded from this definition, such as those who have not completed basic training or have been non-honourably discharged, appear at higher risk of falling into homelessness. The Veterans Ombuds should conduct a systemic review to determine the impacts of this limited definition on homelessness.

### *Core policy recommendations*

#### **Objective 3: Build pathways for veterans to access immediate housing supports.**

Veterans who fall into homelessness need quick and reliable pathways to secure housing. This objective is supported by two recommendations that establish pathways for veterans to obtain housing certificates and emergency funds. Together, these recommendations advance the principle of self-determination and are grounded in the need for people-centered and tailored solutions that support marginalized populations. It is estimated these recommendations will cost \$153.7 million.

Recommendation 3.1 is for VAC to establish a Veteran Housing Certificate Program (VHCP) that provides individualized housing solutions for each veteran. New housing specialists will be brought into VAC to facilitate relationships with local VSOs and housing providers to secure housing options for veterans in need of emergency housing. This program also includes direct cash payments for those veterans who reside in remote and rural regions where a housing specialist is not available.

Recommendation 3.2 is for VAC to disperse the Veterans Emergency Fund to VSOs for faster distribution into the hands of veterans. Recognizing that most veterans are not currently registered with VAC, and that many who experience homelessness find VSOs more approachable, it is recommended that VSOs be provided the capability of disbursing VAC's emergency funds directly to those that they interact with on the ground. It is suggested that VAC begin implementation of this recommendation with a pilot program involving the 105 identified homelessness organizations serving veterans.

**Objective 4: Increase and support veteran-specific housing supply.** To support a long-term approach to veteran homelessness, Canada needs to develop a sustainable supply of housing that meets the needs of veterans. The timely and affordable availability of land is critical to the development of veteran housing projects. The two following recommendations advance Canada's international obligations to progressively realize the right to housing. It is estimated these recommendations will cost \$113 million.

Recommendation 4.1 is for Canada Lands Corporation (CLC) to develop a veteran-specific stream of the Federal Lands Initiative (FLI) to designate divested federal lands to VSOs with capabilities to build veteran-designated homes. In particular, the stream, through the creation of community benefit agreements, would dedicate former Department of National Defence (DND) and CAF land to provide benefits to veterans, including for the purposes of housing. The veteran stream would also require the CLC to conduct a needs assessment of veterans on other divested federal land parcels in its portfolio. The proposal also recommends CLC divide large parcels of land into sizes that VSOs can manage and provide designated technical assistance to VSOs so that they can successfully navigate and complete the land grant application process.

Recommendation 4.2 is for CMHC to develop veteran-specific streams of existing NHS funds such that a proportion of finances are directed to VSOs. It is proposed that the government create veteran streams within the National Housing Co-Investment Fund (NHCF) to support VSOs raising construction capital and the Rapid Housing Initiative (RHI) to support VSOs who are "shovel ready" or capable of repurposing existing infrastructure.

**Objective 5: Improve supports for veterans during transition from military to civilian life.** Some veterans are ill-equipped to successfully transition back to civilian life once they are released from the military, increasing their risk for homelessness. While CAF and VAC have been working towards improving transition supports, existing programs remain disjointed. This objective includes two recommendations to improve support for veterans during their transition and to increase military competency of service providers. These recommendations follow a

person-centered approach and advance principles of prevention, self-determination, and participation. They are estimated to cost \$59 million per year.

Recommendation 5.1 is for CAF and VAC to consolidate and enhance existing transition programs to target risk factors for homelessness. The revamped transition program will require increased collaboration between the departments, improved transition curricula, and regular check-ins following release.

Recommendation 5.2 is for VAC to partner with VSOs to scale up existing training programs to increase the military cultural competency of service providers. It is proposed that such training be subsidized by VAC and included in continuing education required by federal and provincial professional associations.

### *Next Steps*

The recommendations in this report are designed to serve the OFHA in their advocacy work with government departments. Additionally, these findings and recommendations can serve as a springboard for a National Housing Council Review Panel on veteran homelessness. The Review Panel is an accountability mechanism led by the FHA that invites active participation from diverse stakeholders, including individuals with lived experience, to explore and recommend solutions. Simultaneously, this report aims to contribute to the knowledge and evidence base that can be used by stakeholders as well as government and parliamentary entities, such as the Standing Committee on Veterans Affairs, in their efforts towards preventing and ending veteran homelessness.

## INTRODUCTION

The **FHA** is an independent, nonpartisan watchdog responsible for recommending improvements to Canada's housing laws, policies, and programs. The FHA is housed within the CHRC with a mandate to amplify the voices of people experiencing inadequate housing and homelessness. The FHA is tasked with holding governments accountable for its obligations to protect and fulfill the right to adequate housing.<sup>1</sup> In line with the NHS, the OFHA has recognized veterans as one of several groups currently experiencing the greatest housing need and is interested in how the federal government can reduce veteran homelessness. There are key dynamics that define the challenge:

**There is a housing affordability crisis across Canada.** Rents have risen over 12 percent in the past year, and Canadians spend an average of 46 percent of their income to meet housing costs.<sup>2</sup> Canada's current unhoused population has grown to over 235,000, and persistent systemic challenges in income and racial inequality, insufficient mental health and substance use services, inadequate support during transitions between institutional systems, and a scarce supply of affordable housing units further exacerbate the problem.<sup>3</sup> The federal government's 2023 budget laid out several measures to promote housing affordability, including commitments to boost the construction of new affordable homes, implement an *Urban, Rural, and Northern Indigenous Housing Strategy*, and provide financial supports for first-time home buyers.<sup>4</sup>

**Canada's approach to housing is evolving.** With the introduction of the NHS in 2017, followed by the ratification of the *National Housing Strategy Act* (NHSA) in 2019, Canada has begun to adopt a human rights-based approach that recognizes housing as a fundamental human right, in line with international standards. The NHSA is federal legislation that establishes the role of the FHA and requires the Minister of Housing and Diversity and Inclusion to maintain a strategy to advance the right to adequate housing.<sup>5</sup> The NHS is the government's \$82+ billion strategy, establishing a ten-year target to reduce chronic homelessness by 50 percent.<sup>6</sup> The strategy recognizes 11 categories of individuals in greatest need, including veterans.

**Veterans face an elevated risk of homelessness.** Veterans are between two and three times more likely to experience homelessness compared to the average Canadian.<sup>7</sup> Canada is not alone in trying to address veteran homelessness, but countries like the US have made significantly more progress.<sup>8</sup>

**The number of veterans experiencing homelessness in Canada is not well known.** Estimates range from 2,400 to 10,000.<sup>9</sup> Various tools are used across government departments and civil society to estimate the magnitude of veteran homelessness.

**Veteran homelessness has become a recent issue of interest for politicians.** The Standing Committee on Veterans Affairs released a report in 2019 offering ten recommendations focused on government and civil society coordination, proactive engagement and prevention programs, and targeted funding under the NHS.<sup>10</sup> Additionally, this year, the Minister of Housing and Diversity and Inclusion announced a new \$79.4 million program to specifically provide housing support and services for veterans who are currently experiencing homelessness or at risk of experiencing homelessness. The program provides contribution funding through two streams: the \$72.9 million *Services and Supports Stream* for rent supplements and comprehensive services like counseling and substance use treatment and the \$6.5 million *Capacity Building Stream* to support research on veteran homelessness and capacity enhancement for VSOs.

**Many stakeholders cautioned against generalizations.** The nature of veterans' risk factors, military experiences, and challenges with homelessness are incredibly diverse, and generalizations are often inaccurate.<sup>11</sup> These insights guided a person-centered approach to this study of veteran homelessness. Similarly, a recurring theme across interviews was the need to recognize the vast diversity in how homelessness is experienced; this informed a broad view of homelessness that includes individuals who reside in emergency shelters, provisional accommodations, or precarious or unsafe housing situations.<sup>12</sup>

This report will begin by introducing the research methodology, the role of the FHA, and the principles of a human rights-based approach to housing, which are embedded throughout. It will then present the ecosystem and policy landscape in which the issue of veteran homelessness evolves, before diving into the main key findings from the literature review and stakeholder interviews. The report presents five objectives with key policy recommendations to reduce veteran homelessness. Finally, the report ends with a critique of the federal government's new Veteran Homelessness Program, additional considerations to advance the right to housing, evaluation and reporting mechanisms, and steps to advance the recommendations presented.

## RESEARCH METHODOLOGY AND LIMITATIONS

### *Research methodology*

This report is built upon a robust foundation of extensive research, which included a comprehensive literature review, in-depth stakeholder interviews, and examination of relevant legal obligations. The literature review encompassed a diverse range of academic and gray sources, facilitating a thorough analysis of the different approaches, theories, and empirical evidence relating to veteran homelessness. Literature was mainly gathered through Google Scholar and the McGill Library, using key phrases that included, but were not limited to: (Homeless\* OR Houseless\* OR Unhoused OR Itinérance OR Itinérant\* OR "Sans domicile fixe" OR "sans abri") AND (Veteran\* OR military OR militaire OR "ancien combattant") AND Canada.

In addition, this study incorporated insights from three key documents that helped to guide the research: the 2017 *National Housing Strategy*, the 2019 *Moving Towards Ending Homelessness Among Veterans* report from the Standing Committee on Veterans Affairs, and the 2022 *Report 5 - Chronic Homelessness* from the Auditor General of Canada.<sup>13</sup> Finally, research efforts also explored veteran and homelessness related programs and policies implemented in other jurisdictions, including the US, the UK, Finland, Australia, and South Africa.

Alongside an extensive literature review, a total of 35 interviews were conducted between January and June 2023. These interviews sought to elicit diverse feedback on the various complexities from stakeholders across varied experiences and backgrounds. The stakeholders interviewed represent a wide range, including government entities, Crown corporations, national Indigenous organizations, human rights experts, VSOs, and homelessness-serving organizations. Notably, careful consideration was given to selecting stakeholders who embody the diverse intersections of the issue, ensuring representation in regional diversity, both official languages, gender identity, sexual orientation, and Indigenous identity. Several of the policy recommendations were “tested” with stakeholders in secondary interviews to assess for relevancy and feasibility.

### *Limitations*

The primary limitation of this study is the inability to directly interview veterans with lived experience of homelessness. However, it is worth noting that within VSOs, many individuals working on the frontlines possess personal experiences or have witnessed the realities faced by veterans experiencing homelessness. While the perspectives of the latter cannot fully substitute for direct lived experience, their observations and expertise offered valuable insights into the realities of the issue which helped to inform the analysis and recommendations presented in this report.

Another limitation is the broad scope of this policy challenge, which encompasses all veterans rather than focusing on specific subgroups. Due to time constraints, it was not possible to thoroughly explore and analyze the unique needs and challenges faced by each subgroup. Consequently, the recommendations provided in this report are intended to address the overall veteran population. Further research and targeted policy recommendations must be prioritized to address the unique needs and challenges of these subgroups in order to provide enhanced support and tailored solutions.

Lastly, the policy landscape on veteran homelessness has evolved throughout the development of this report. Most notably, the federal government introduced a new \$79.4 million program to fund new initiatives by civil society organizations and subnational

governments working on veteran homelessness. The roll-out of this program is ongoing, and it remains to be determined what local initiatives will be created and supported with these funds.

## ROLE OF THE SPONSOR

The OFHA was established by the NHSA to ensure that every Canadian has access to safe and affordable housing. The FHA serves as an independent authority responsible for monitoring the strategy's implementation and addressing any housing-related issues.<sup>14</sup>

The FHA plays a crucial role in monitoring the implementation of the NHS and reporting its progress to Parliament. The OFHA conducts research and analysis on housing-related issues such as housing conditions, affordability challenges, and homelessness; they provide valuable insights for policy recommendations and advocate for necessary changes. The FHA adopts a HRBA to its work, focusing on advancing the rights of those who are marginalized, excluded, or discriminated against.

While the FHA plays an important role in promoting and protecting the right to adequate housing, there are certain constraints and limitations. The FHA does not have legislative power to independently create or change housing laws. They can only collect information and submit a report to the Minister of Housing and Diversity and Inclusion, which must be responded to within 120 days. Consequently, the FHA operates within the political landscape, which can greatly influence the prioritization and implementation of their recommendations.

**This report is designed to provide policy options that the FHA can directly recommend to all the relevant federal departments.**

## HUMAN RIGHTS-BASED APPROACH TO HOUSING

A HRBA to housing goes beyond perceiving housing as a commodity or shelter, emphasizing human dignity, substantive equality, and social justice. It prioritizes addressing the needs of marginalized populations and ensures that housing is adequate based on international human rights standards.<sup>15</sup>

Principles of a HRBA include the right to self-determination, non-discrimination, substantive equality, the right to participate in decision-making processes, progressive realization, and accountability. HRBA places people at the center of policy objectives. The policy recommendations in this report are guided by these principles:

**People-centered and right to self-determination:** These principles place individuals and communities at the forefront of policy making and program design, acknowledging their right to participate in decision-making processes pertaining to housing, including design, location, and community development. These principles reinforce individual autonomy and the right for individuals to make choices that reflect their specific needs.

**Non-discrimination:** This principle ensures that every person is entitled to equal rights and dignity, free from unjust discrimination. It emphasizes that no individual should be subjected to unfair treatment or denied equal opportunities based on characteristics such as race, gender identity, language, religion, political affiliation, disability, age, or other status.

**Substantive equality:** This legal principle ensures that all individuals and groups have equal opportunities to access and enjoy their housing rights. It requires prioritizing the needs of the most vulnerable and marginalized populations in society, such as veterans experiencing homelessness and subgroups of the veteran population who face adverse barriers and challenges in accessing and maintaining adequate housing, like women and gender-diverse individuals and members of Indigenous communities.

**Participatory mechanisms:** This principle acknowledges the significance of involving individuals and communities with firsthand lived experience in the development and implementation of housing policies, fostering a sense of ownership and accountability.

**Progressive realization:** This concept requires governments to implement reasonable measures, utilizing the maximum available resources, to enhance housing conditions. Progressive realization also advances the principle of non-regression, which prohibits the undermining or reversal of housing rights once they have been attained.

**Accountability and progress reporting:** These principles establish housing indicators and criteria based on human rights principles, which serve to evaluate advancements, identify deficiencies, and address gaps in housing policies and programs.

## ECOSYSTEM

### *Stakeholders*

Effectively addressing veteran homelessness in Canada requires collaboration among key stakeholders, including all levels of government and non-governmental organizations (NGOs). Currently, stakeholders are pursuing various different policies and programs. With the added jurisdictional responsibilities across levels of government, this results in a fragmented policy landscape. The most important stakeholders include:

**Infrastructure Canada:** Infrastructure Canada oversees the implementation of the NHS as well as federal Crown corporations including CMHC and the CLC. CMHC is a Crown corporation that strives to make housing affordable and is responsible for the distribution of funds within the NHS.<sup>16</sup> Infrastructure Canada is in charge of the distribution, management, and implementation of national data on homelessness.<sup>17</sup> This includes the management of national Point-in-Time (PiT) counts and national HMIS agreements with provinces to gain an accurate picture of homelessness in Canada.

**VAC:** VAC is responsible for supporting the well-being of veterans and their families after leaving the CAF. They deliver programs such as disability benefits, financial benefits, rehabilitation, pension advocacy, education, and training support.

**CAF:** The CAF employs members serving in the military. Once serving members complete basic training and are honourably discharged, they are considered veterans and fall under the jurisdiction of VAC. CAF and VAC are jointly responsible for the transition of members out of the military and into civilian life.

**National Indigenous Organizations (NIOs):** Some NIOs, such as the Assembly of First Nations, the Inuit Tapiriit Kanatami, and the Métis National Council, are currently working on developing their own homelessness strategies, including for Indigenous veterans experiencing homelessness.

**Subnational governments:** Provincial and territorial (P/T) and municipal governments hold primary jurisdiction over the provision of housing and social services. They collaborate with the federal government to implement homelessness strategies and provide local-level support. Subnational governments have recognized the need to build affordable housing for veterans and have allocated targeted funds for veteran housing.

**Civil society:** VSOs and other homelessness-serving organizations are significant contributors to the fight against veteran homelessness. Shelters, outreach programs, and veteran-focused NGOs offer immediate support, counseling, and assistance in accessing housing and resources for veterans experiencing homelessness. National VSOs offer various programs and funds targeted at acute veteran homelessness. These groups are often on the front lines of working with veterans experiencing homelessness. Other NGOs focus directly on providing housing solutions for veterans through charitable funds and collaboration with various levels of government.

## Policies

Several existing policies and programs, across all levels of government, govern the issue of veteran homelessness today. These include:

**The NHS:** An \$82+ billion strategy, the NHS is the government's landmark policy on housing.<sup>18</sup> The strategy recognizes veterans as one of 11 key priority groups that should be prioritized for stable and permanent housing. The NHS is implemented by Infrastructure Canada and the Canada Mortgage Housing Corporation (CMHC).

**Reaching Home:** A \$4+ billion strategy housed within the NHS, *Reaching Home* is a community-focused program that provides funding to address local homeless needs.<sup>19</sup> The strategy supports the implementation of a HMIS to collect data and provide case management, provides grant support to increase understanding of homelessness, and creates designating funding streams for indigenous, territorial, and rural homelessness. The strategy is implemented by Infrastructure Canada.

**The Veteran Homelessness Program:** Announced in April 2023, the program dedicates \$79+ million to civil society organizations, researchers, and subnational governments to provide rent supplements and support wrap-around services, such as addiction treatment, job training, and mental health counseling.<sup>20</sup> Part of the NHS, the program also provides financial grants to organizations for the purpose of data collection and capacity building. The program is jointly implemented by Infrastructure Canada and VAC. The first-round of grant applications for local organizations was completed in July 2023, with funding results pending

**Veterans Emergency Fund:** VAC offers resources to assist veterans who are experiencing financial emergencies. The most notable is the Veterans Emergency Fund, a \$1.3 million fund that veterans can apply to in times of need.<sup>21</sup> This program provides immediate financial assistance to veterans who are experiencing homelessness or acute housing precarity, addressing urgent needs like emergency shelter, food, and clothing.

## KEY FINDINGS

1. **There remains a lack of federal departmental leadership on the issue:** No single federal department or agency is tasked with upholding the right to housing for veterans; instead, several federal players are involved, including Infrastructure Canada, VAC, the CAF, and CMHC, without clear government responsibility. With various civil society programs and jurisdictional challenges on housing across the country, there is a need for federal leadership to support and coordinate a national approach to homelessness.<sup>22</sup>
2. **There are significant discrepancies in the reported numbers and identities of veterans experiencing homelessness:** Estimates of the number of unhoused veterans vary greatly from government and civil society stakeholders, ranging from 2,400 to over 10,000.<sup>23</sup> The nature of veteran homelessness makes it particularly challenging to quantify, as many veterans experience 'hidden homelessness', such as couch-surfing or living in vehicles.<sup>24</sup> Many veterans seldom interact with services, such as shelters and food banks, which serve as the common data collection sites.<sup>25</sup> While the government has created and implemented the HMIS for local communities to collect real-time information on their unhoused populations, the data collected is inadequate to meaningfully understand the scope of homelessness among veterans.
3. **Former CAF members who do not meet Canada's definition of a veteran are exposed to additional risks of experiencing homelessness:** Not all former CAF members can equally access the benefits and services provided by VAC. This is partly attributed to VAC's definition of a veteran, which excludes those who have been forced to interrupt military training before completion due to illness or injury or who have been discharged non-honourably.<sup>26</sup> Individuals who do not meet the definition may be more likely to find themselves in precarious situations after release from the military, yet their exclusion from the definition directly inhibits their ability to benefit from many VAC services.<sup>27</sup>
4. **Many unhoused veterans are reluctant to self-identify as veterans, hindering the delivery of existing benefits and services:** Negative experiences during time spent in the armed forces, distrust of government, embarrassment or pride, and the perception of not qualifying as a "real" veteran because of a lack of foreign deployment can all contribute to an individual's reluctance to self-identify.<sup>28</sup> This is a significant barrier in preventing former CAF members from accessing benefits and services.
5. **Services do not meet the needs of women and gender-diverse veterans experiencing homelessness:** Women account for 16.2 percent of the total veteran population; however, they represent 30 percent of veterans experiencing homelessness.<sup>29</sup> The experience of homelessness also looks different for women and gender-diverse individuals: instead of living on the streets and/or accessing shelters, these individuals are more likely to be couch surfing or in transactional relationships – such as staying with someone in exchange for sex.<sup>30</sup> Available services, from VAC benefits to homeless shelters, are typically designed to meet the needs of single males and not women and gender-diverse individuals.
6. **Some individuals entering the armed forces have preexisting risk factors for homelessness:** Those who enlist in the all-volunteer force appear to be at a higher risk for homelessness, due to a social selection effect whereby individuals with particular risk factors for homelessness – including economic insecurity, weak family unity, and limited education – are disproportionately recruited into the volunteer forces.<sup>31</sup>
7. **CAF and VAC inadequately support veterans in their transition to civilian life:** Despite efforts by CAF and VAC to support veterans after their release from service, many challenges persist during veterans' military-to-civilian transition that can exacerbate the risk of experiencing homelessness.<sup>32</sup> Challenges include feeling abandoned by the armed forces after discharge and the loss of sense of purpose and community, leaving the military without transferable skills, poor financial literacy, and delays in transferring health coverage to the civilian public system.<sup>33</sup> Many veterans also experience barriers to accessing VAC benefits because of complicated bureaucratic processes, long backlogs, and delays in reimbursements.<sup>34</sup> Finally, veterans face challenges receiving proper care because many service providers lack military cultural competency.

8. **VSOs face challenges financing the development of veterans housing projects:** Several civil society organizations across Canada specialize in building housing projects designed to meet veterans' unique needs. These projects create communities for veterans that often provide units of a manageable size, on site social supports, and job training. However, these organizations increasingly face challenges securing land to build projects and financial support for operations. Despite programs under the NHS to allocate federally divested lands and funds to support development and operation costs, VSOs find it difficult to compete with larger private developers to secure NHS grants and low-interest loans.<sup>35</sup>

Together, these findings demonstrate the need to holistically address veteran homelessness from three angles: supporting those with preexisting risk factors during their military service, preventing those leaving the armed forces from falling into homelessness, and creating programs that can provide access to housing for all veterans experiencing homelessness. The findings also emphasize the need for policies and programs to consider the diversity of experiences and needs of veterans experiencing homelessness and raise caution about building programs based on generalizations.<sup>36</sup>

## LIMITATIONS OF NEW VETERAN HOMELESSNESS PROGRAM

### *Overview of Infrastructure Canada's Veteran Homelessness Program*

In April 2023, as part of the *Reaching Home* strategy, Infrastructure Canada released a five-year *Veteran Homelessness Program*. This program is delivered in two streams, the *Services and Support Stream* and the *Capacity Building Stream*. Funding is provided to organizations and subnational governments to address veteran homelessness in Canada. However, funds may not be used by applicants to fund new capital construction projects or to purchase land.

The *Services and Support Stream* focuses on rent supplements and the delivery of wrap around supports for veterans experiencing homelessness. \$72.9 million has been made available to organizations and governments to implement local programs to reduce veteran homelessness, and expand the capacity of service providers operating in the homelessness and veteran-serving sector. Contributions up to \$6.5 million are available for project proposals over a 5-year period.

The *Capacity Building Stream* aims to improve research and data collection on veterans experiencing homelessness. \$6.5 million has been made available to support research on the specific needs and challenges faced by veterans experiencing or at risk of homelessness. Contributions up to \$1.5 million are available for project proposals over a 5-year period.

### *Limitations*

Infrastructure Canada's *Veteran Homelessness Program* is a step in the right direction, recognizing veterans as a priority group in need of individualized support. However, there are notable gaps that fail to address key issues at the root of the problem. These gaps include:

**Shouldering responsibility on VSOs:** While the program provides funding to support local projects and programs related to veteran homelessness, its success relies largely on the capacity of local VSOs. This approach shifts the responsibility onto local organizations without directing federal departments and agencies to implement national-level policies to address the issue. VSOs, who already face capacity constraints, will have to further allocate resources and compete with other initiatives to receive funding.

**Unclear prioritization of funding:** The lack of clear prioritization of funding within both streams of the program raises concerns about how projects will be selected and prioritized. This could result in financing certain types of projects while overlooking other important areas that may be traditionally underfunded. Additionally, it remains unclear how the funds will be allocated, including whether there will be a focus on projects that ensure regional representation and address the specific needs of subgroup populations, such as women and Indigenous veterans.

**Lack of focus on prevention:** The program's lack of focus on prevention neglects to address the underlying causes of veteran homelessness. It is crucial for the government to develop initiatives that not only aid those currently experiencing homelessness but also adopt a proactive approach to prevent homelessness in the first place.

**Insufficient investment in data challenges:** Although the program allocates \$6.5 million for new research initiatives, it does not fully address the issue of inherent data gaps and comprehensive understanding of the issue. While new funding for research is crucial and should remain available, there is a need to take a more proactive approach to specifically address data collection and sharing challenges to gain a more accurate understanding of the extent of veteran homelessness.

## POLICY RECOMMENDATIONS

The policy recommendations are divided into two sections: foundational and core recommendations. Foundational recommendations present policies that will shape the government's approach to, and understanding of, the issue of veteran homelessness. Meanwhile, the core recommendations aim to create programs that address the acute needs of unhoused veterans, build capacity to realize the right to housing, and adopt a preventative approach for future veterans. **These recommendations are designed for the FHA to advance and direct to all the relevant federal departments.** Additionally, given the wide range of estimates in numbers of veterans experiencing homelessness – between 2,400 and 10,000 – an average of 6,200 veterans is used for costing purposes in this report.

### FOUNDATIONAL POLICY RECOMMENDATIONS

#### **Objective 1: Veterans Affairs Canada to take primary leadership on veteran homelessness**

Ownership of the issue of veteran homelessness does not currently reside with any one federal government agency. In line with the Office of the Auditor General's report in 2022, several stakeholders voiced concern about the lack of clarity on governmental responsibility over veteran homelessness between VAC, CAF, CMHC, and Infrastructure Canada. This lack of clarity on responsibility has led to minimal federal accountability on the implementation of the NHS and realization of housing rights, especially for veterans.<sup>37</sup>

While addressing veteran homelessness will require a whole-of-government approach, stakeholders expressed the need for a clear governmental leader who can be held accountable for enshrining the right to housing for veterans.<sup>38</sup> Given the distinct needs of veterans experiencing homelessness, and the intersectionality of housing precarity with other unique social needs of veterans, VAC is best positioned to implement policies and programs specifically designed to end chronic veteran homelessness. However, for VAC to effectively assume this leadership role, clarity in legislation, changes to VAC's approach to service delivery, and consultation with veterans and VSOs with lived-experience and expertise is needed.

**Recommendation 1.1** Introduce legislation to amend the *Department of Veterans Affairs Act* to explicitly include the responsibility of housing security for veterans

The *Department of Veterans Affairs Act* assigns the Minister of Veterans Affairs and VAC with the "authority for the care, treatment, [and] reestablishment in civil life of any person[s] who served in the CAF."<sup>39</sup> It would be reasonable to presume that this mandate includes the authority to provide means of stable housing attainment for veterans. In addition, the 2019 mandate letter to the Minister of Veterans Affairs called on VAC to "build new, purpose-built accessible and affordable housing".<sup>40</sup> In the 2021 mandate letter, the Prime Minister (PM) included the need for wrap-around supports for veterans.<sup>41</sup> Despite this broad mandate from legislation and direction from the PM, VAC has yet to lead the development and implementation of programs aimed at reducing veteran homelessness. Non-governmental stakeholders have emphasized this mismatch between VAC's mandate and its administrative reach.<sup>42</sup> While the legal mandate appears sufficiently broad and inclusive enough to cover the issue of housing, there appears to exist a different operational reality and a missed opportunity for VAC to take the lead on addressing housing insecurity for its beneficiaries. Given this concern, it is recommended that the issue of housing be made more explicitly clear within

VAC's mandate through legislative amendment to the *Department of Veteran Affairs Act*, brought forth by the Minister of Veteran Affairs.

### Case study: US

Several amendments to Section 38 of the US Code, *Veteran Benefits in the US*, have included housing as a veteran benefit and have authorized the Department of Veterans Affairs to administer programs to provide affordable housing to eligible veterans. Notably, housing was not explicitly included in the original legislation, but several legislative amendments have deemed the Department of Veteran Affairs responsible for providing certain housing benefits, including the *Veterans' Housing Opportunity and Benefits Improvement Act of 2006* which provides housing loans and housing adaptation for veterans.<sup>43</sup>

### Case study: South Africa

Section 5 of the *Military Veterans Act* establishes the legal framework for addressing welfare, benefits, and social services for military veterans. Each veteran who serves in the military is entitled to housing, ensuring that every veteran in their transition to civilian life has access to adequate housing. The Department of Military Veterans is responsible for implementation of these housing rights and does so through the coordination of housing projects. It is important to note that the right to housing is not only recognized under the *Military Veterans Act* but is also enshrined in Section 26 of the South African constitution.<sup>44</sup>

### Considerations

*Political levers:* The consideration of amending legislation to enshrine the right to housing for veterans within the *Department of Veterans Affairs Act* in Canada involves several important factors. Amending legislation is a time consuming process that will require alignment with the Minister of Veteran Affairs on the added value of the proposed change to the portfolio. Although private members can present legislative changes that are voted on in the House of Commons, it is crucial to have the support of the current Minister of Veterans Affairs to ensure a successful passage. This legislative change introduces complexities due to the shared responsibilities across ministries, notably the Minister of Housing and Diversity and Inclusion. Effective collaboration and coordination between both Ministers and departments will be necessary to facilitate a transition and a successful handover.

### Cost

Other than administrative costs, no significant investment is needed to amend the mandate. However, indirect and downstream costs are expected with respect to expanding VAC's portfolio. The main interventions proposed to fall under this new portfolio are costed in the forthcoming recommendations, assigned to VAC, in this report. **Total estimated cost: None.**

**Recommendation 1.2** Adopt a preventative approach to service delivery by registering all 337,993 unregistered veterans as members of Veterans Affairs Canada

337,993 veterans in Canada remain unregistered with VAC.<sup>45</sup> This is largely because VAC has taken a limited and reactive approach to service delivery that primarily focuses on assisting veterans who actively seek out their benefits and services. VAC must shift from its current reactionary service delivery approach to adopt a more preventive approach that aims to register all veterans, regardless of their need for services and benefits. Registering all veterans with VAC would not only enable a better understanding of the veteran population but

also facilitate the design of targeted benefits and services tailored to their specific needs. This would enable VAC to address the challenges faced by veterans more effectively and preventatively. For instance, research indicates that veterans often experience homelessness approximately ten years after their release.<sup>46</sup> By proactively registering all veterans, VAC can implement preventive measures and provide necessary support to reduce the risk of homelessness across the population. Registering all veterans as clients of VAC would also foster a stronger sense of community and purpose. Regular communication and engagement with the entire veteran community would make significant strides towards creating a supportive network, promoting social cohesion, and enhancing the overall well-being of veterans across Canada.

Additionally, despite the comprehensive benefits and programs available to support veterans, there remains a significant lack of awareness among veterans and key stakeholders regarding the existence and scope of these resources.<sup>47</sup> VAC does little to publicly communicate to veterans about the services they provide. This lack of awareness hampers the effective utilization of available benefits and services. Furthermore, confusion persists surrounding the process of accessing and fully utilizing these resources, contributing to the underutilization of valuable support systems that are intended to assist veterans in their transition to civilian life.<sup>48</sup> To address the lack of awareness and confusion surrounding veteran benefits and services, there is a pressing need for increased and consistent advocacy and communications from VAC to its members. This, in turn, can lead to improved utilization of benefits and services, ultimately enhancing the overall well-being and successful transition of veterans into civilian life.

### Considerations

*Capacity building:* In the current system, upon completion of an individual's service, members of the CAF are not automatically registered as VAC members. This has resulted in a significant number of veterans who are not currently recognized as VAC clients. To address this gap, VAC needs to undertake two essential actions: register all 337,993 unregistered veterans and ensure that future veterans are connected to VAC prior to their release.<sup>49</sup> However, it is important to note that incorporating these individuals into the system will require an increase in administrative costs and internal capacity within VAC. While this will increase the number of VAC clients and necessitate an expansion of administrative resources, it aligns with VAC's mandate of supporting the well-being of veterans and their families.

*Communications strategy:* To ensure the registration of all 337,993 unregistered veterans and foster a stronger sense of community within VAC members, a comprehensive national communication strategy will be required. Communication channels that resonate best with veterans should be utilized. The communications strategy should be developed and led by VAC's internal communications team while incorporating the expertise and input from program and policy units.

*Collaboration with CAF:* To successfully onboard all unregistered veterans, enhanced collaboration between VAC and the CAF is crucial. Specifically, because VAC does not have the contact information for the unregistered veterans, CAF should facilitate the contact between VAC and veterans.

### Cost

An estimated \$1 million of new funding will be required to support the onboarding process. Furthermore, the national communications campaign aimed at targeting unregistered veterans should be considered as a significant investment, requiring an allocation of \$1 million per year for three years. **Total estimated cost: \$2 million/year.**

**Recommendation 1.3** Create a Veterans Affairs Canada advisory council on veterans' housing security to consider lived experience and improve civil society coordination

Evidence from research and stakeholders have identified the need for more effective coordination among civil society groups.<sup>50</sup> For VAC to successfully address veteran homelessness and deliver its policies and programs in alignment with local civil society work, it needs to understand the existing landscape of VSOs across Canada and their challenges interacting with one another and with government programs. Additionally, VAC must also understand the lived experience of those veterans who have experienced homelessness. It is recommended, in accordance with a HRBA, that VAC create an advisory council specific to the issue of veteran homelessness, seating members with lived experience and from veterans-serving organizations. The council should have the mandate and ability to recommend policy solutions to the Minister of Veteran Affairs.

To date, there exist six advisory councils covering issues of families, care and support, policy, mental health, commemoration, and transition. Each council has an individualized mandate and can provide advice to the Minister of Veterans Affairs. There is currently no council specific to the issue of veteran homelessness.

#### Case study: US

The US Department of Veterans Affairs (VA) hosts the Advisory Committee on Homeless Veterans, a 15-member council including individuals with lived experience, advocates from VSOs, service providers from mental illness and substance use disorder programs, and experts in affordable housing development. The committee provides advice to the VA Secretary, providing assessment of current programs and recommendations for improvement.<sup>51</sup>

#### Considerations

*Certified VSOs:* Currently, there are 105 organizations that serve veterans identified by VAC; these organizations should serve as a starting point from which VAC can extend invitations for participation on the advisory council.<sup>52</sup>

*Ensuring diversity and representation:* There are a diverse set of perspectives and experiences among individuals with lived experience – including veterans at the intersection of marginalized identities – and VSOs. It is unclear how VAC currently recruits participation on its existing advisory councils, but it is recommended that VAC follows principles of nondiscrimination, under a HRBA, to ensure a broad basis of identity and experience is represented on the council.

*Limitations of location and technology:* Currently, existing advisory councils meet using telecommunication platforms or in-person in Ottawa. Stakeholders who work with unhoused veterans have commented that many veterans do not feel comfortable sharing their challenges with VAC case managers and other service providers over these online platforms. Additionally, many individuals with valuable experiences for the advisory council may not reside in or near Ottawa, limiting their ability to participate. As such, implementation of the advisory council should reevaluate the role of these platforms in facilitating participation of members outside of Ottawa and consider providing funding such that meetings can occur in other regions of Canada. One consideration would be for the council to focus on different regions of Canada each year, inviting new members from those regions to serve one-year terms on the council.

*No required response:* While the advisory councils of VAC can create and provide policy recommendations to the Minister of Veterans Affairs, there is no legal requirement for the

Minister to publicly respond to the council (like there is for a Standing Committee in Parliament).

### Cost

Existing VAC advisory councilors serve on a voluntary basis and current costs are primarily for meetings, travel, and report dissemination. However, it is important for individuals with lived experience to be compensated for their time. With a projected council size of 12 individuals, meeting quarterly, with an honorarium of \$1,000/individual/meeting, it is estimated that the cost to establish a council on veteran housing security would cost \$48,000/year. It is estimated that an additional \$50,000 will be required to support meetings, travel, and report dissemination. **Total estimated cost: \$100,000/year.**

**Fulfilling a HRBA:** By committing to progressively realizing housing as a right for veterans, there must also be a clear and accountable duty holder responsible for the realization of this right. Currently, with the involvement of CMHC, CLC, Infrastructure Canada, and VAC, it remains unclear which federal department is primarily accountable for the realization of housing rights for Canadian veterans. However, it is clear, from its mandate, that VAC is *the* federal agency responsible for the well-being of, service delivery to, and civilian integration of veterans. Given the unique housing needs of veterans and the distinct policy mechanisms required to realize housing as a right for this population, a review to determine the ability for VAC to take ownership of the veteran homelessness issue, as a duty holder, is necessary to fulfill a HRBA.

A second key component of HRBA advanced by these recommendations is the creation of participatory mechanisms to engage individuals and communities with lived experience in the direct creation and implementation of policy solutions. If VAC is to remain involved in creating policy solutions for veteran homelessness – as it is proposed in this report to do so moving forward – then it must center those with lived experience into its decision-making processes. The creation of an advisory council that is seated by individuals and organizations with lived experiences, and that can make policy recommendations, places VAC on a pathway towards meaningfully fulfilling its role as a duty holder.

### **Objective 2: Achieve a shared and accurate understanding of homelessness among veterans in Canada**

The scope and magnitude of veteran homelessness is not well understood. Due to the fragmented nature of data collection, information on veterans experiencing homelessness remains incomplete and, when available, is siloed among various sources such as government agencies, civil society organizations, and local community entities. The absence of centralized and coordinated data collection impedes efforts to accurately quantify the population of veterans experiencing homelessness, monitor trends, and identify underlying patterns or root causes. The significant discrepancies concerning the scale of the problem further contribute to the misalignment of government and civil society initiatives aimed at tackling veteran homelessness. By investing in policies to overcome the challenges related to data collection and knowledge gaps, a more accurate and comprehensive understanding of veteran homelessness can be achieved.

#### **Recommendation 2.1** Onboard veterans-serving organizations onto Homeless Management Information Systems to better capture data on veterans experiencing homelessness

Accurate data plays a vital role in comprehending and effectively assisting veterans facing homelessness. Recognizing this issue, as part of the *Reaching Home* strategy, the federal government provides funding to communities across Canada for the establishment of HMIS.

These systems are designed to facilitate coordination and real-time access to information on individuals experiencing homelessness within communities.<sup>53</sup>

Despite these efforts, most organizations utilizing community HMIS primarily consist of traditional service points, such as shelters and food banks. However, it is imperative that VSOs are integrated into community HMIS, with appropriate support, given that they are more likely to interact with unhoused veterans than traditional service points. VSOs also have the skill set to identify those who may be more reluctant to self-identify as veterans, enabling them to capture a more accurate picture of veteran homelessness via HMIS. It is therefore recommended that Infrastructure Canada onboard veterans-serving organizations onto Homeless Management Information Systems to better capture data on veterans experiencing homelessness. The federal government should prioritize the onboarding of the 105 identified organizations that serve veterans onto local HMIS.<sup>54</sup>

This integration will not only enable veterans to better access available supports and services more effectively, but it will strengthen the accuracy and reliability of data on homelessness among this population. Stakeholders have expressed their willingness to participate and share data, but they have not received these types of requests.<sup>55</sup> By including VSOs in community HMIS, a more comprehensive understanding of homelessness among veterans can be achieved.

#### Case study: City of London, Canada

In 2021, the City of London achieved functional zero for veteran homelessness largely due to the use of HMIS, which not only identified veterans experiencing homelessness but also helped connect veterans with VAC benefits and services.<sup>56</sup> HMIS provided a centralized and comprehensive database that allowed service providers to have accurate and up-to-date information on each homeless veteran, enabling personalized support and targeted interventions.<sup>57</sup> By adopting HMIS, the City of London was able to identify and address the needs of veterans experiencing homelessness on an individual basis, resulting in effective interventions, stable housing solutions, and a significant reduction in veteran homelessness.

#### Considerations

*Technical support:* The federal government's *Reaching Home* strategy offers funding for organizations and communities to integrate with local HMIS. However, when communities are being onboarded, VSOs are not often prioritized. For the successful integration of VSOs into HMIS, it is essential to utilize currently available funding from *Reaching Home* to also support ongoing maintenance and operation. Existing HMIS support provided by Infrastructure Canada, such as the HMIS support desk and technical team, should be scaled up to better assist local organizations with the necessary support needed to enhance their capacity. By prioritizing sufficient funding for system setup, ongoing maintenance, and technical support, VSOs can effectively utilize the HMIS and maximize data collection capabilities.

*Closing the gap:* There are currently 105 identified organizations that provide services to veterans experiencing homelessness.<sup>58</sup> While these organizations have specialized programs and services for veterans, some also provide services to a broader scope of individuals experiencing homelessness. These organizations, in some cases, may already be onboarded, reducing the number of VSOs that require integration into HMIS platforms.

*Leveraging the Legions:* Not included in the 105 identified VSOs are the 1,350 branches of the Royal Canadian Legion.<sup>59</sup> Legions are very active in veteran communities across Canada and play a key role in connecting members to services and benefits. For example, due to the inadequate availability of public health services in some regions, certain Legions are providing

social services to veterans such as mental health and substance use supports.<sup>60</sup> Recognizing that Legions act as a trusted provider and place of community for many veterans, it is important to also have them onboarded to local HMIS to gather data that is specific to this population.

### Cost

The estimated cost of onboarding one organization onto the HMIS platform is approximately \$30,000.<sup>61</sup> The onboarding of the 105 veterans-serving organizations identified by VAC would result in a total cost of \$3.1 million. It is important to note that these estimates assume that none of the VSOs are currently using HMIS, which is unlikely to be the case, resulting in a lower cost of implementation. The funding for implementing this recommendation is already available through the federal government's existing Reaching Home strategy.<sup>62</sup> **Total estimated cost: \$3.1 million, one time cost.**

**Recommendation 2.2** Add veteran-specific questions to Homeless Management Information Systems to better identify the needs of veterans experiencing homelessness

P/Ts receives funding from the *Reaching Home* program to fund implementation of HMIS, with necessary data sharing agreements with the federal government. When an individual is accessing a service provided by a homelessness serving organization, they often have to answer a minimum of 18 questions that are shared with the service provider, P/T governments, and the federal government.<sup>63</sup> Currently, there is one mandatory question that asks individuals whether they identify as a veteran or not. It is recommended that if an individual self identifies as a veteran, further questions to better understand the veterans experience can be prompted to ascertain key information to improve understanding of which veterans are becoming homeless and the type and security of housing they are able to obtain, if ever. Stakeholders highlighted that questions about rank, tenure in the CAF, existing VAC benefits, housing status, and security of tenure are the most important to better understand the unique experiences of veterans experiencing homelessness.<sup>64</sup> Asking more comprehensive and military specific questions within the existing data gathering platforms is the most practical and affordable way to better understand the issue.

### Considerations

*Updating existing HMIS:* Many P/Ts, as well as civil-society organizations, are currently utilizing HMIS across the country. The addition of new required questions will not automatically adjust HMIS currently in operation. Proper alignment with all organizations and jurisdictions utilizing HMIS is necessary to ensure these questions are added to every system.

*Data sharing:* Although many of these HMIS receive funding through *Reaching Home*, the data is still owned and managed by the respective P/Ts. The federal government has individual bilateral agreements with each P/T to outline how and when data should be shared.<sup>65</sup> While it is anticipated that most P/Ts will readily adopt these changes, some jurisdictions may require more formal and negotiated amendments to existing data sharing agreements in order to ensure the appropriate questions are being asked and reported back to the federal government.

*Military cultural competency:* When asking veterans about their time in service, it is important that this be done in a culturally competent way. Recognizing that many veterans experiencing homelessness are reluctant to self-identify, approaching questions with care and awareness may lead to more veterans feeling comfortable disclosing personal information about their time in service.<sup>66</sup> However, it is expected that VSOs have this competency and expertise to best approach veterans that interact with their organizations.

### Cost

There is no formal cost to add new fields of questions to existing P/T HMIS questionnaires. **Total estimated cost: None.**

**Recommendation 2.3** Collect data on preexisting risk factors for homelessness to improve supports for members during their service

Existing literature suggests that individuals who enlist in the volunteer armed forces face a higher risk of homelessness compared to the general population, primarily due to a social selection effect where those with preexisting risk factors for homelessness – such as economic insecurity, familial instability, and limited education – are overrepresented in military recruitment.<sup>67</sup>

The current onboarding process employed by the CAF consists of five steps: submitting an application, undergoing reliability screening, taking an aptitude test, undergoing a medical examination, and participating in an interview.<sup>68</sup> However, despite the multiple steps involved, the process for entry into the military utilized by the CAF currently falls short of adequately evaluating individuals for preexisting risk factors that contribute to homelessness.

It is therefore recommended that the CAF embeds an assessment of preexisting risk factors for homelessness following the completion of CAF's onboarding process. This assessment should gather data on the prevalence and severity of such preexisting risk factors. By implementing more robust data collection practices, the CAF can gather valuable insights that will enable them to develop targeted programs aimed at building protective factors while individuals are in service.

This improved data collection process must encompass a thorough examination of various factors that can exacerbate the risks of experiencing homelessness, including socioeconomic status, (lack of) social and familial ties, substance abuse patterns, familial history of homelessness, existing mental health conditions, level of education, and future career aspirations following military service.

### Considerations

*Follow-up interventions:* It is important that the CAF goes beyond simply collecting data and makes use of it to identify ways in which it can develop support programs during the military to reduce the incidence of these risk factors.

*Disaggregation and de-identification:* The collected information should not be used to discriminate against individuals from entering into the armed forces. On the contrary, such collection of data is aimed at building capacity to best support individuals in their military service and prior to their release. To ensure the data is not used against individuals, rigorous de-identification and disaggregation of data should occur so that only broader analysis can be conducted, with no risk for individuals.

### Cost

The development costs of a US trauma and mental health screening tool were used as reference to estimate the costs of collecting such data. This screening tool costs US\$74/individual, which approximates to CA\$100/individual at the time of this report's publication.<sup>69</sup> Based on data from 2019-2020, it is possible to estimate that approximately 10,000 individuals join the military on a regular year.<sup>70</sup> Hence, the cost of such a data collection endeavor can be estimated to \$1 million annually in new funds. **Total estimated cost: \$1 million/year.**

## Recommendation 2.4 Investigate limitations of VAC's definition of a veteran

VAC, whose mandate is to support the well-being of veterans and their families, defines a veteran as “any former member of the CAF who successfully underwent basic training and is honourably discharged”.<sup>71</sup> According to several stakeholders, this definition excludes many individuals who have been forced to terminate their military training or service early as a result of illness, injury, or even sexual orientation.<sup>72</sup> Additionally, the current definition excludes all former members of the armed forces who were not honourably discharged – a group that has increased risk factors for homelessness.<sup>73</sup> For all three groups, exclusion from the definition of a veteran directly impedes their ability to access VAC benefits.

The Office of the Veterans Ombuds (VAC Ombuds) reviews complaints and challenges the policies and decisions of VAC, when and where individual and systemic unfairness is identified. In recent years, the VAC Ombuds has completed systemic reviews and created policy recommendations of disability benefit wait times, implementation of pension benefits, and transition challenges, among others. Given that several groups of former CAF members remain ineligible for VAC benefits, the VAC Ombuds is the right entity to investigate if the veteran definition has created systemic unfairness for these groups.

### Case study: US

In the US, the definition of a veteran, in 13 CFR § 125.11, includes those who are disabled by injury or illness, and subsequently released, during military training as qualifying as a veteran.<sup>74</sup> Additionally, in 2020, H.R. 2398 passed the House of Representatives allowing for individuals discharged for conduct other than honourable to become eligible for rental assistance vouchers through the *Housing and Urban Development-Veteran Affairs Supportive Housing* (HUD-VASH) program.<sup>75</sup> The Congressional Budget Office estimated that an additional 1,300 individuals would become newly eligible as a result of the change.<sup>76</sup> Notably, parts of H.R. 2398 were absorbed into the 2021 *Defense Authorization Act*, and the eligibility change for the HUD-VASH program was not included.<sup>77</sup>

### Case study: Australia

In 2019, the Australian Parliament broadened its definition of veteran status, inclusive of those with non-honourable discharges. In its passage of the *Australian Veterans' Recognition Bill*, Australia adopted a definition of veteran that is any “person who is serving, or has served, as a member of the Permanent Forces of the Reserves.”<sup>78</sup> In doing so, Australia now allows individuals who did not receive honourable discharges to be issued veteran cards and be considered for veteran benefits, choosing not to discriminate against individuals who may have been discharged for disciplinary reasons.

## Considerations

*Inconsistent definitions:* While VAC's official veteran definition is limited to individuals with honourable discharges and completion of basic training, the federal government employs operational definitions for various programs that differ from VAC's official definition, such as in *Reaching Home*.<sup>79</sup> Regardless of whether changes are made to the veteran definition, it is recommended that the federal government adopt a singular veteran definition, making clear which former service members are eligible for benefits.

*Retroactive effects:* Should VAC's definition of a veteran be modified, there will be questions about the retroactive eligibility of former service members. VAC must make clear the extent to

which former CAF members – who left during basic training or were discharged non honourably – if they qualify for new benefits. It is recommended that these groups are retroactively included in eligibility for benefits given that these groups are believed to disproportionately be represented in the current population of veterans experiencing homelessness.

### Cost

The VAC Ombuds currently operates a \$5.6 million annual budget to investigate systemic issues, write reports, and disseminate findings.<sup>80</sup> It is not expected that a recommendation to investigate disparities created by VAC's veteran definition falls outside the scope of normal VAC Ombuds operations and will therefore not come at an additional cost to the VAC ombud's office or the federal government. **Total estimated cost: None.**

**Fulfilling a HRBA:** Grounding a human rights-based approach is the legal concept of substantive equality, which requires an evaluation of equality of outcomes for disadvantaged and marginalized people and groups in society. Within the veteran group exists a diversity of groups, including those who have been discharged during training, expelled because of their sexuality, or discharged non-honourably, that experience particular disadvantages, discriminations, and exclusions that exacerbate their risk for homelessness. An evaluation of the veteran definition, and thereby eligibility for benefits, will help the Canadian government progress towards achieving substantive equality and progressively realizing housing rights for former CAF members who currently do not meet the veteran definition.

## CORE POLICY RECOMMENDATIONS

### Objective 3: Build pathways for accessing immediate housing supports

Currently, there is no national program that provides immediate access to housing for veterans currently experiencing homelessness. Research suggests that it is more affordable for governments to provide housing (\$12,000 - \$34,000) to individuals than it is for individuals to remain unhoused (\$66,000 - \$120,000).<sup>81</sup> In some cases, a small financial grant may be all a veteran needs to ensure they do not become unhoused. Research from Infrastructure Canada suggests that a veterans' inability to pay rent is a leading cause of homelessness.<sup>82</sup> Veterans who are experiencing homelessness need help to ensure they have stable and appropriate housing, and it is critical that an individualized approach is taken as no one solution will suit the needs of all individuals equally.

**Recommendation 3.1** Establish a veteran housing certificate program to provide individualized housing solutions to veterans

VAC should establish a Veteran Housing Certificate Program (VHCP) to provide individualized rent supplements to veterans experiencing homelessness. Certificates should be distributed with an individualized approach to meet each veteran's unique needs. This approach recognizes that additional coverage will be required for veterans who have dependents and will be aware of unique barriers that are faced by marginalized groups such as women and Indigenous veterans. The establishment of the VHCP supports recommendation nine of the 2019 *Moving Towards Ending Homelessness Among Veterans* parliamentary committee report, which highlights the need to create rent supplements for veterans.<sup>83</sup>

Certificates will be distributed by case managers who are assigned to each veteran once they have been identified by a HMIS. Case managers will ensure that the veteran is receiving appropriate benefits and the social services they need. New VAC housing specialists will assist case managers with finding veterans culturally appropriate and adequate housing, while recognizing their right to self-determination. One housing specialist will be placed in each of the 36 VAC regional offices across the country. Housing specialists will be responsible for building relationships with VSOs and public and private housing providers to best understand housing options for each veteran and secure agreements on housing placements for veterans. Distribution of these housing certificates will be primarily distributed by agreements between VAC and partner housing providers.

By tailoring housing solutions and support services to the specific requirements of each person, it ensures that veterans fundamental rights to adequate housing and dignity are upheld. Providing more resources to help support housing needs will promote individual autonomy and self-determination, and will help veterans better participate in decisions about their housing situation.

Canada provides basic rental supplements and housing supplements to new refugees through the Resettlement Assistance Program (RAP). This program accounts for factors that may impact an individual's cost of living such as location and number of dependents.<sup>84</sup> The RAP program has been very successful in integrating refugees to Canada, and ranks as one of the highest countries nationally for integration of newcomers in part because of this program.<sup>85</sup> While veterans are a different group, the mechanisms for disbursement in RAP can serve as a model on how to implement housing certificates and best support veterans in achieving adequate housing in Canada.

### Case study: US

HUD-VASH has been one of the most successful programs in reducing veteran homelessness in the US. Since its inception in 2010 it has contributed to a 55% reduction in veterans experiencing homelessness, with an 11% decrease since 2020 alone.<sup>86</sup> The Department of Housing and Urban Development (HUD) provides the permanent housing subsidy through their housing choice voucher program. Veterans Affairs is responsible for case management and other supportive services to assist veterans. Once a veteran has been identified as experiencing homelessness, they are matched with a Veterans Affairs case manager to set-up an individualized plan. The vouchers themselves are distributed by local public housing agencies which are operated by HUD, who directly pay the rental income – on behalf of the veteran – to the housing provider based on pre-arranged agreements with the providers.<sup>87</sup>

### Considerations

*Rural communities:* Deploying an individualized approach that works for each veteran is necessary to find long term solutions for successful housing. While it is optimal that these certificates are managed and distributed by local VAC housing specialists to housing providers, it is important to recognize that veterans living in rural settings may need different accommodations to actively participate in the program. VAC should follow a similar structure to the RAP program which prioritizes existing arrangements with housing providers but will offer funds directly to individuals under unique circumstances or where relationships with housing providers have yet to develop. This will ensure that rural veterans are able to participate in the program fully.

*Building capacity:* Currently there is a significant shortage of case managers working at VAC; the ratio of case managers to VAC clients is between 35:1 to 50:1.<sup>88</sup> The federal government has made a commitment to reduce this ratio to 25:1, which will require significant investments in case managers.<sup>89</sup> Assuming there are 6,200 veterans experiencing homelessness, VAC will need to hire 248 additional case managers to support these veterans, with a case manager to veteran ratio of 25:1. While increasing case managers is of primary importance, it is also important to prioritize national distribution of case managers across Canada. Moreover, prioritization should be given to individuals with lived experience to best serve veterans across Canada.

### Cost

Assuming there are 6,200 veterans experiencing homelessness in Canada, and considering these certificates would cost on average \$20,000 per person per year, the total average cost to provide housing certificates will be \$124 million annually.<sup>90</sup> This costing assumes that the population of veterans experiencing homelessness will remain stable at 6,200 people and that the program will enroll 6,200 veterans in the first year. While the goal is to have every veteran experiencing homelessness housed through the program, it is unlikely there will be 100% uptake in the first year. It also does not reflect the adjusted costs associated with a successful program. As more veterans are identified and connected to housing solutions through the VCHP, there is expected to be reductions in the number of veterans seeking certificates, leading to yearly reductions in the total cost of the program.

In order to best support the needs of veterans, there will need to also be increased investment in Case Managers and Housing Specialists. We assume that both roles make an average of \$100,000 per year (wage, benefits, taxes).<sup>91</sup> 248 case managers will be required to adequately meet the needs of veterans experiencing homelessness, costing \$24.8 million annually. The addition of VAC housing specialists in each of the 36 regional offices will require an investment

of \$3.6 million annually to implement nationally.<sup>92</sup> Funding for this recommendation will come from new funds allocated to VAC. **Total estimated cost: \$152.4 million/year.**

**Recommendation 3.2** Disperse Veterans Affairs Canada's Veterans Emergency Fund to veterans-serving organizations for faster disbursement into the hands of veterans

This recommendation aims to expedite financial assistance to veterans who are at risk of homelessness. Certified VSOs will submit applications to VAC to obtain funds that they can distribute at their discretion. Currently, there are 105 identified organizations that support veterans experiencing homelessness in Canada.<sup>93</sup> There are also many additional VSO's that support veterans but are not recognized explicitly by this definition. These organizations would seek to receive funds from VAC that they can then disperse rapidly to individuals facing acute crises. This approach addresses the challenge that many veterans, who are not current clients of VAC or lack trust in seeking assistance from VAC, are currently unable to access the Veterans Emergency Fund during times of acute need. There will be no predetermined limit or maximum amount of funds that organizations can apply for or distribute, as this will vary based on region and individual needs.

Emergency funds for housing are important to support a HRBA to housing. By providing immediate financial assistance to individuals experiencing homelessness or at risk of homelessness, these funds help safeguard veterans' fundamental right to adequate housing. They address the urgent needs of vulnerable individuals, ensuring access to safe and secure shelter, which is essential for human dignity and well-being. Emergency housing funds align with the principles of inclusivity, equality, and progressive realization, as they prioritize the most vulnerable. This recommendation is supported by the Standing Committee's 2019 *Moving Towards Ending Homelessness Among Veterans* report which highlights the importance of working with VSOs to best support veterans.<sup>94</sup>

### Considerations

*Administrative burden:* The implementation and evaluation of this program present inherent complexities. Additional administrative burdens will be placed on VSOs during the application process; however, this program will best achieve the expedition and distribution of funds to veterans most in need, with the ultimate aim of mitigating their risk of homelessness.

*Preventing Misappropriation:* By allocating funds to VSO's to distribute, VAC will have less control over monitoring fund disbursement. To combat the risk of fund misappropriation, VAC can require VSOs to provide progress reports on fund utilization and disbursements.

### Cost

There are currently 105 identified VSOs in Canada.<sup>95</sup> We recommend that the initial fund be piloted with these certified VSOs for one year with an initial investment of \$1.3 million.<sup>96</sup> This \$1.3 million dollar fund will run in parallel with VAC's existing \$1.3 million Veterans Emergency Fund. If the pilot is successful, we recommend that disbursement of the Emergency Fund is replaced or amalgamated by this new program. The assumption is that VAC will be able to provide resources to manage the fund via existing personnel. Funding for this recommendation will come from new funds allocated to VAC. **Total estimated cost: \$1.3 million/year.**

**Fulfilling a HRBA:** This approach recognizes the importance of tailoring solutions to meet the unique needs of different groups of veterans, emphasizing the provision of individualized programs and support services. By upholding the principles of self-determination and choice, veterans are able to find housing options that best align with their specific needs.

#### Objective 4: Increase veteran-specific housing supply

The timely and affordable availability of land is critical to the development of veteran housing projects. These veteran-specific housing projects are a necessary part of the solution towards ending acute and chronic veteran homelessness. Some civil society organizations build specialized housing models that incorporate support services and personnel support on site, provide veterans with a sense of community, and tailor spaces to the unique physical needs of veterans.

Stakeholders familiar with the development of veteran-specific housing projects have noted significant challenges with the procurement and purchase of land parcels to build these necessary housing models. Under the NHS, several funding and land provision programs – managed by the CMHC and the CLC – have been created to support the development of affordable housing projects. However, several stakeholders have experienced obstacles in accessing these funds and programs. In particular, stakeholders noted challenges engaging with request-for-proposal processes by CLC and the absence of readily available technical support from CLC and CMHC. Additionally, the sale of large parcels of land by CLC excludes smaller VSOs from competing with large private developers.<sup>97</sup> Unlike for Indigenous and women groups, the NHS has yet to designate specific funds or land for veterans and VSOs, despite the NHS listing veterans as one of 11 priority groups.

**Recommendation 4.1** Develop a veteran-specific stream of the Federal Lands Initiative to increase availability of land for veteran housing development

It is recommended that CLC create a veteran-specific stream of the Federal Lands Initiative (FLI) – a NHS program that provides community organizations and developers with federally divested land for repurposing – to designate lands to VSOs with the capability of building homes for veterans. Under the FLI, federal lands have been designated for housing vulnerable groups such as persons with disabilities, Indigenous groups, and seniors; however, land has never been designated specifically for veteran housing projects. A veteran stream of the FLI will include, but not be limited to, the designation of divested DND and CAF land for veteran-specific development projects.

To designate former DND and CAF land, it is recommended that CLC create community benefit agreements for the veteran population. These agreements aim to ensure that part of the divested land is repurposed to provide certain benefits to the veteran community, primarily for housing, but also for other benefits such as employment opportunities and/or job training. Currently, ex-DND and CAF lands exist in CLC's portfolio for revitalization that could be immediately considered for veteran-specific housing projects. These sites include: Shannon Park (Halifax, NS), Wateridge Village (Ottawa, ON), Currie (Edmonton, AB), and Jericho (Vancouver, BC).<sup>98</sup> Additionally, given that these parcels of land are quite large, not all parts of a land project need be designated to veterans under community benefit agreements; land not needed for veteran projects should be considered to provide affordable housing and supports to other priority groups.

#### Case study: US

A similar approach to the designation of divested federal lands for affordable housing projects has been successfully implemented in the US. In particular, the US has successfully repurposed divested defense lands for transitional and permanent housing units for veterans. Title V of the *Stewart B. The McKinney Homeless Assistance Act* makes serving unhoused populations the first priority for use of all surplus Federal properties, including military installations.<sup>99</sup> To date, 65 projects have been completed under the aforementioned legislation, six of which have been projects developed for veterans. For example, in 1997,

under Title V of the *McKinney Act*, the non-profit New Directions secured a 60,000 square foot unoccupied building on the West LA Veterans Affairs campus. Opening in 1997, New Directions opened the Regional Opportunity Center with 156 beds designated for unhoused veterans, including 24 beds for substance abuse detoxification. New Directions provides money management, legal assistance, health education, counseling, and vocational training on site. Annually, the site houses 250 veterans, half of whom transition to permanent housing within one year. Total cost of refurbishment reached US\$5.4 million, with an annual operating budget of US\$4 million supported by local, state, and federal grants.<sup>100</sup>

For non-DND and CAF land that is added to CLC's FLI portfolio, veterans' needs should still be considered. It is recommended that CLC conduct a needs assessment to understand if there are veterans in the community who can benefit from housing and whether there are local organizations capable of developing veteran housing projects on the land. CLC has demonstrated capability to conduct such a needs assessment through community consultation.

### **Case study: City of Toronto, Canada**

The 62-acre William Baker lands in the City of Toronto, formerly part of the Canadian Forces Base Downsview, was divested in 2019 and sold by CLC to Parc Downsview Park Inc., a private developer. As part of its consultation process prior to land allocation, CLC determined from local stakeholders and community members a need for mix-tenure and mix-type housing, and, in particular, a need for accessible and affordable housing for senior citizens. As a result, CLC's request for proposal process required applicants to detail plans for the creation of affordable housing for seniors, showcasing CLC's capacity to undertake a needs assessment and engage stakeholders and community members in consultation prior to allocating divested land.<sup>101</sup>

### Considerations

*Novelty of commemoration:* In an effort to promote the welfare of those who have served in the CAF, and with an intention to meaningfully repurpose federal lands to provide affordable housing and ease the current crisis in housing affordability, we see the proposal of a veteran FLI stream as a mechanism for the federal government to novelly commemorate former defense lands to veterans who served this nation from them.

*Technical Support:* Stakeholders noted challenges engaging with CLC's request-for-proposal process, public knowledge of land availability, and the absence of readily available technical support from CLC. In order for veteran-specific streams within the FLI to work, there needs to be technical personnel support from CLC available to help small VSOs to successfully complete the request for proposal and land grant application processes. As such, it is proposed that there is at least one full-time employed individual internal to CLC, with expertise in nonprofit management, whose role it is to assist local NGOs proceed through the application process.

*Manageable parcels of land:* VSOs, and CLC itself, identified the sale of large parcels of lands as a barrier for smaller VSOs to compete with large private developers for property through the FLI. As such, the veteran-specific stream of the FLI must consider the division and distribution of smaller parcels of land that are manageable for VSOs and veteran-specific housing projects.

*Indigenous land rights:* Assessment and determination of land rights prior to land distribution is necessary to uphold Canada's responsibility of meaningful reconciliation with First Nation,

Inuit, and Métis peoples. Today, the federal government already engages in a process of land rights assessment prior to temporary allocation to CLC for final sale. Under this proposed veteran stream of the FLI, we expect the same land rights assessment process to continue to occur so that all Indigenous claims for DND/CAF land are evaluated and resolved prior to assessing suitability for veteran-housing projects.

### Cost

FLI is an existing \$200 million fund that supports the transfer of surplus federal lands and buildings at discounted rates or at no cost. The proposal of a veteran-stream of the FLI is not expected to require additional funding not already included in the \$200 million fund. Instead, the veteran stream of the FLI is designed to be an administrative programmatic change of an established program. Additional funds may be required if Canada Lands determines the need to hire external personnel to provide technical support, contributing an additional administrative cost of \$100,000 - \$150,000 per year. **Total estimated cost: \$150,000/year.**

**Recommendation 4.2** Develop veteran-specific streams of NHS funds to finance the development of veteran housing projects

For the federal government to support the development and sustainability of veteran-specific housing projects, CMHC should create veteran-specific funding streams of existing NHS funds to provide VSOs capital, through low-interest and forgivable loans. Of all existing NHS funds, veteran streams of the National Housing Co-Investment Fund (NHCF) and the Rapid Housing Initiative (RHI) will best support the needs of veteran home providers.

The NHCF is a \$13.2 billion fund to provide loans and contributions to support the creation of affordable housing units.<sup>102</sup> To date, CMHC has developed population-specific streams of the NHCF for other NHS priority groups including: women and children, Indigenous communities, and Black-led organizations; these population-specific programs of the NHCF serve as models for a new veteran-specific NHCF stream.<sup>103</sup> The proposal for a veteran-specific stream of the NHCF is not novel. The Prime Minister's 2021 mandate letter to the Minister of Veterans Affairs called for a dedicated stream of funding for veterans within the NHCF.<sup>104</sup> There have yet to be developments on this request. In tandem with a veteran stream of the FLI, a veteran stream of the NHCF will provide veteran home builders with new avenues to secure funds and resources to initiate new veteran housing projects.

The Rapid Housing Initiative (RHI) is a \$1.5 billion fund designed to provide funding to support “shovel ready” projects or projects to repurpose old infrastructure into affordable housing.<sup>105</sup> While the RHI primarily targets larger housing developers with the resources to quickly jump-start new projects, it recognizes that some smaller veteran home builders may find themselves in need of top-up funds to become “shovel ready,” and the RHI should be made available to them. Additionally, veteran home builders who consider repurposing old infrastructure for affordable veteran-specific homes will be able to benefit from a veteran-specific RHI fund.

### Considerations

*Technical support:* Similar to the need for technical support to proceed through the application process set forth in the FLI, stakeholders identified challenges engaging with CMHC to access funding through CMHC-operated funds, like the NHCF. Therefore, as part of this recommendation for a veteran-stream of the NHCF, it is recommended that CMHC creates a role to support VSOs' applications to funds. Recognizing that an organization may engage in the FLI and NHCF process consecutively – first to secure land and subsequently to secure funding for build – it is recommended that both Crown corporations create avenues by which both technical support roles can communicate and share information.

*Operating costs:* Currently, both the NHCF and the RHI provide funding to cover building costs. However, they do not cover costs for operational expenses – which can represent a considerable burden for civil society organizations, especially in the context of supportive housing units. By establishing veteran-specific supporting streams of NHS funds, CMHC can alleviate the financial burden on civil society organizations, allowing them to dedicate an increased proportion of the funds raised to cover for operating costs.

### Cost

The NHCF is an existing fund with \$7.2 billion in uncommitted funds. \$113 million, or 1.6% of the existing NHCF budget should be redirected to the creation of this veteran-specific stream.

The estimated cost of building an individual unit of veteran housing is \$273,000. This estimate is an average of the cost known for three-specific veteran projects across Canada, including a \$4 million 20-unit project in Alberta (\$200,000/unit), a \$12 million 40-unit project in Ottawa (\$300,000/unit), and a \$34 million 107-unit project in Sault Ste. Marie, Ontario (\$318,000 per unit).<sup>106</sup>

NGOs specializing in the build of veteran-specific housing projects estimate the average stay of a veteran in one of their transitional units is two years. Assuming a 30-year longevity for new housing projects, it is estimated that a single unit will service a minimum of 15 veterans over its lifetime. As a result, the cost of housing each veteran is \$273,000/unit/15 veterans, for a total of \$18,200/veteran. This estimate aligns with current costs to municipalities to house veterans, like the City of Medicine Hat, who estimate the cost to house an individual is between \$12,000 and \$34,000.<sup>107</sup>

Estimating there are 6,200 unhoused veterans across Canada, the total cost of building the required housing units for veterans is \$113 million. **Total estimated cost: \$113 million/year.**

**Fulfilling a HRBA:** The opportunity for VSOs to develop a sustainable housing supply that meets the needs of veterans is unequal to that of larger housing developers in the private market. To fulfill the legal principle of substantive equality, the federal government must tailor its response to the unique causes of disadvantage experienced by unhoused and at-risk veterans. Recognizing the systemic risk factors for homelessness experienced by veterans and the distinct housing needs of currently unhoused veterans, the principle of substantive equality requires federal government policies and practices be responsive to this uniquely disadvantaged group.

The NHS obliges the federal government to progressively realize the right to housing, an obligation grounded in international law.<sup>108</sup> This obligation requires the federal government to take steps to the maximum of its available resources to achieve the full realization of the right to housing. With available land and funds, this recommendation would aid the federal government in advancing its commitment to progressively realize the right to housing for all veterans.

### **Objective 5: Improve supports for veterans during transition from military to civilian life**

Some veterans feel abandoned once they are released from the military and are ill-equipped to successfully transition back to civilian life. Poor transition is a risk factor that increases the likelihood of homelessness later in life.<sup>109</sup> Additionally, available supports and services often lack the military cultural competency to adequately meet the needs of veterans. To address these deficiencies, there is a need for a more comprehensive transition program aimed at improving veterans' entry into civilian life, while also establishing protective measures to mitigate the risk of homelessness.

**Recommendation 5.1:** Consolidate and enhance existing CAF-VAC transition programs to target risk factors for homelessness

In recent years, CAF and VAC have made significant progress in improving the transition process for serving members being released from the military (see *Appendix C for existing CAF and VAC transition programs and services*).<sup>110</sup> Despite these steps forward, insights from stakeholders have revealed persistent gaps, notably with respect to veterans' re-entry into the workforce, financial literacy, and transfer between health systems.<sup>111</sup> While there are many resources available, they are fragmented and disjointed, making them hard to find and comprehend as part of a seamless process.

The recommended six-step transition program aims at consolidating existing services to increase and standardize the transition pathway, enhancing programming to fill current gaps, and increasing individualized support so that specific needs of veterans are better met (see *Appendix C for the full detail of the proposed enhancements to current transition programs and supports*). It is inspired both by insights from stakeholder interviews and by programs from the US, the UK, and Australia (see *Appendix C for an overview of other jurisdictions' transition programs*).

Step one establishes the start of the transition program which begins the moment an individual joins the armed forces. Following the implementation of data collection regarding preexisting risk factors for homelessness in the Canadian context (See *Recommendation 2.3*), it is recommended that CAF and VAC increase collaboration to develop subsequent programming and supports. These initiatives should focus on addressing the risk factors identified through the collected data and guide the development of protective measures for individuals during military service.

Step two incorporates a transition curriculum during service, covering topics such as available services and benefits provided by CAF and VAC, challenges of transition, financial literacy, knowledge about how to find and maintain housing, career support and connection to the Career Transition Services (CTS), community reintegration and mental health literacy.

Step three focuses on the one to two years prior to the identified date of an individual's release and consists of pre-release counseling. This counseling should involve VAC case managers to ensure individualized support, as well as continuity of care following release.

Step four, which would take place during the 6-month period prior to release, consists of more specific pre-release counseling, notably to support the member in registering with VAC and to assist with completing administrative tasks for all benefits to which they are eligible for. This includes finding housing for when they are released, and transitioning between military to civilian health systems. During this period, soon-to-be-released members should undergo a transition readiness assessment, completed jointly by CAF Transition Centres (TC) and VAC case managers. This assessment would confirm registration to VAC and that housing has been secured.

Step five aims to provide additional support to members deemed unready to transition. If securing housing proves particularly challenging, or if it is expected that the soon-to-be veteran will experience challenges in maintaining housing, there should be a redirection towards newly established VAC housing specialists (see *Recommendation 3.1*) to provide individualized support.

Step six refers to the period during post-release. Veterans should continue to receive support by VAC case managers as long as needed. Regular check-ins following a member's transition should also be conducted by VAC to continuously assess their needs and enable appropriate

support. Ongoing assistance following release is particularly relevant considering that veterans tend to fall into homelessness later down the line – on average, ten years after being discharged.<sup>112</sup>

### Case study: US

In the US, it is recommended that the transition process starts two years prior to retirement, but members must begin their transition process at least 365 days prior to release or, if they are demobilized with less notice, as soon as they are made aware of their release. The US Transition Assistance Program (TAP) is provided both on base as well as virtually, and includes three main components: counseling, curriculum, and a capstone event (see *Appendix C for more details*).<sup>113</sup>

### Case study: UK

In the UK, the Defense Transition Services (DTS) were established, in 2019, following the adoption of the Minister of Defence's Holistic Transition Policy.<sup>114</sup> DTS provides individualized support for members and their families who need extra support as they leave the armed forces. The support covers elements related to physical and mental health, substance use, education and employment, housing, finance, and benefits. Among other things, the UK DTS offers a series of briefings on civilian housing annually. These briefings cover topics such as home ownership, private rental, social housing, financial advice, and affordable housing programs. The UK also has a program called the Single Persons Accommodation Centre for the Ex-Services (SPACES), which is "designed to help single service leavers find appropriate accommodation when they leave. Through this service, the project reduces the likelihood of ex-services personnel becoming homeless or sleeping rough after discharge."<sup>115</sup> Similar to CTS, the UK Ministry of Defence also has its own Career Transition Partnership (CTP), which offers support in the format of career counseling, skills development workshop, vocational training courses, online career tools and resources, and more.<sup>116</sup>

### Case study: Australia

In Australia, through the Defence Force Transition Program (DFTP), serving members have access to a series of resources up to 24 months after their release.<sup>117</sup> This includes transition coaches which offer individualized support, programming that covers employment services, career transition training, a clearance session prior to release, and post-transition surveys every three months (see *Appendix C for more details*).

### Considerations

**CAF-VAC collaboration:** This transition program will require increased collaboration between CAF and VAC. It is recommended that VAC case managers take the lead on pre-release counseling and transition readiness assessments, to ensure individualized support and continuity of care following release. Such collaboration would notably require merged databases and/or data sharing agreements between CAF and VAC.

**Increased individualized support:** To provide members with individualized support to better assist in completing crucial transition steps, such as securing housing, transitioning between health systems, opening up a VAC account and applying for appropriate benefits, there is a need to build case management capacity at VAC. Case managers are already overworked, with only approximately 400 personnel and a ratio of 35 to 50 veterans per case managers.<sup>118</sup>

Despite the Government of Canada's commitment in 2016 to reduce the ratio of veterans per case manager to a maximum of 25:1, a substantial reduction has not yet been achieved.<sup>119</sup> To enable increased individualized support, there is a need to significantly increase the amount of case managers hired by VAC.

*Eligibility:* Individuals who are discharged without their own volition (e.g. incomplete training, non-honourably discharged) and therefore do not meet VAC's definition of a veteran, should still be eligible to participate in the transition program, as proposed. The program is not "veteran-specific" but rather targeted to all CAF members. Even if an individual's date of release is determined out of their own volition, all members should still participate in the transition curriculum while in service, in pre-release counseling and in the transition readiness assessment.

*Specific needs of subgroups:* Transition looks different for all serving members – especially for different subgroups of the veteran population, such as female and Indigenous veterans. Consultation with these groups is essential to identify any unmet needs and to help inform the development of tailored programming to address those needs effectively.

### Cost

Revamping the transition program will engender costs with respect to three different components: developing a transition curriculum, scaling up the CTS, and increasing the hiring of case managers.

The costs of developing a transition curriculum can be estimated based on the costs of the US TAP, which amounted to approximately US\$31 million in the 2021 fiscal year for 150,000 veterans transitioning out of the military.<sup>120</sup> In Canada, there are between 5,000 and 10,000 veterans transitioning out of the military each year.<sup>121</sup> Using estimates from the US TAP, it will approximately cost CA\$2.7 million to administer the program every year. With additional funds needed to develop the program, a total one-time cost of approximately CA\$4 million will be needed.

VAC allotted a total of \$5.7 million over three years in funding for CTS. During this period, 3,800 of the 30,510 released CAF members enrolled into VAC's CTS.<sup>122</sup> Increasing funding so that all members are automatically enrolled into CTS, at a stable rate of release per year, would cost approximately \$15 million.

The major expense to implement this program will be to hire additional case managers. Considering there are between 5,000 and 10,000 veterans transitioning out of the military each year, and a desired ratio of 25:1, 400 new case managers will need to be hired. Estimating the yearly salary of case managers at \$100,000 per year (inclusive of salary, benefits, taxes), this would come with an annual estimated cost of \$40 million. **Total estimated cost: \$59 million/year.**

**Recommendation 5.2** Scale up existing training programs to increase the military cultural competency of service providers

The military culture's unique practices, traditions, and beliefs create a distinct environment that can add complexity and potential challenges for civilian healthcare providers without prior military experience.<sup>123</sup> Stakeholder interviews highlighted that most Canadian service providers outside of the military lack appropriate military cultural competency.<sup>124</sup> This leaves many veterans' needs unmet.

Providing services in a culturally competent manner contributes to ensuring that the care for patients is more appropriate, effective, and respectful. Research suggests that improving the

military competency of service providers helps to improve patient satisfaction, leading to better health outcomes.<sup>125</sup> On the contrary, the absence of military cultural competency can result in various adverse consequences, including veterans disengaging from treatment, inaccurate assessments, challenges in establishing a supportive clinician-patient relationship, and, ultimately, ineffective treatment outcomes.<sup>126</sup>

Research substantiates the significance of healthcare providers and staff receiving training in military cultural competency, as it highlights the ways in which the distinctive belief system of the military impacts veterans' process of reintegrating into civilian life.<sup>127</sup> Yet, in contrast to other jurisdictions, Canada lacks specific mechanisms to ensure that service providers meet established standards of military cultural competency. For example, the US has implemented criteria that mandates training for non-veteran staff on military and veterans' culture.<sup>128</sup>

Some training programs exist in Canada, such as those provided by Warrior Health. Warrior Health is a clinical training platform to increase military cultural competency amongst service providers such as social workers, psychologists, physicians, and case managers by providing "insight into the unique nuances of stoic service cultures [...] typical of Military and First Responder work environments."<sup>129</sup> However, the uptake of this program with service providers is still fairly limited. This underscores the necessity for VAC to establish a formal partnership with Warrior Health and allocate resources to expand the scaling up of this training program to increase the number of certified clinicians nationwide.

### Considerations

*Creating incentives:* There needs to be incentives for service providers to complete military cultural competency training. To address the potential barrier posed by the cost of training for service providers, VAC can alleviate this burden by offering subsidies or financial support to ensure accessibility and facilitate participation. Additionally, completion of this training should be recognized as part of the mandatory hours for continuing education required by federal and P/T professional associations. Finally, the provision of military cultural competency should be included in the standards for healthcare and mental health service delivery, developed by the federal government.<sup>130</sup>

*Specific needs of subgroups:* Given that cultural competency varies among different subgroups of the veteran population – such as women, gender-diverse, and Indigenous veterans – it is essential to review and enhance existing programs. This should be done in consultation with relevant subgroups to ensure that the training effectively addresses the distinct and specific needs of these populations.

### Cost

The enrollment fee for the Warrior Health training program is \$200 per individual.<sup>131</sup> Although the costs are not high, there may be limited motivation for healthcare professionals to personally invest in this type of training. To encourage wider participation, subsidies to cover the cost of training may significantly increase uptake. Presently, Warrior Health has certified 100 clinicians.<sup>132</sup> An initial target should aim to train all VAC case managers, Point-in-Time (PiT) counters, and individuals utilizing HMIS, as well as an additional 500 healthcare and mental healthcare providers nationwide. Considering the current number of VAC case managers and healthcare providers, this would estimate a total of 1,000 new trainees, at an approximate cost of \$200,000. **Total estimated cost: \$200, 000 for pilot project.**

**Fulfilling a HRBA:** These recommendations follow a person-centered approach. Ensuring individualized and increased support for all transitioning members of the CAF increases the likelihood that their specific needs will be met. Additionally, enhancing military cultural

competency among service providers will enable them to effectively consider and address the distinctive experiences of veterans in their service provision.

This program further upholds the right to self-determination by empowering CAF members to take a leading role in developing their own transition plan, defining their post-transition goals, and actively participating in the process. Finally, through comprehensive training of service providers to address the unique needs and challenges faced by veterans as a vulnerable group, this program promotes the right to substantive equality in accessing services. By including at-risk veterans, such as those with non-honourable discharges or incomplete basic training in the transition process, increased equitable outcomes can be achieved.

## SUMMARY OF RECOMMENDATIONS

**Table 1: Summary of recommendations and overview of implementation considerations**

Recommendation	Targeted actor	Estimated cost/year (\$K)	Funding source
<b>1.1</b> Introduce legislation to amend the <i>Department of Veterans Affairs Act</i> to explicitly include the responsibility of housing security for veterans	Minister of VA	N/A	N/A
<b>1.2</b> Adopt a preventative approach to service delivery by first registering all 337,993 unregistered veterans as members of Veterans Affairs Canada	VAC	2,100	New funds
<b>1.3</b> Create a Veterans Affairs Canada advisory council on veterans' housing security to consider lived experience and improve civil society coordination	VAC	100	New funds
<b>2.1</b> Onboard veterans-serving organizations into Homelessness Management Information Systems to better capture veterans experiencing homelessness	Infra. Canada	3,100	Existing funds
<b>2.2</b> Add veteran-specific questions to Homelessness Management Information Systems to better identify the needs of veterans experiencing homelessness	Infra. Canada	N/A	N/A
<b>2.3</b> Collect data on preexisting risk factors for homelessness to improve supports for members during their service	CAF	1,000*	New funds
<b>2.4</b> Investigate limitations of Veterans Affairs Canada's definition of a veteran	Veterans Ombud	N/A	N/A
<b>3.1</b> Establish a veteran housing certificate program to provide individualized housing solutions to veterans	VAC	152,400**	New funds
<b>3.2</b> Disperse Veterans Affairs Canada's Veteran Emergency Fund to veterans-serving organizations for faster disbursement into the hands of veterans	VAC	1,300	New funds
<b>4.1</b> Develop a veteran-specific stream of the Federal Lands Initiative to increase availability of land for veteran housing development	CMHC	150	New funds
<b>4.2</b> Develop veteran-specific streams of NHS funds to finance the development and operational sustainability of veteran housing projects	CMHC	113,000	Existing funds
<b>5.1</b> Consolidate and enhance existing CAF-VAC transition programs to target risk factors for homelessness	CAF & VAC	59,000	New funds
<b>5.2</b> Scale up existing training programs to increase the military cultural competency of service providers	VAC	200*	New funds
<b>Total estimated cost</b>		<b>332,350</b>	
<b>Total estimated cost of new investments</b>		<b>216,250</b>	

\* Punctual costs (one-time investment)

\*\*Costs estimated for subsequent years of implementation expected to be lower than costs estimated for initial year

*Funding new investments*

Annually, VAC returns several million dollars in unused funds back to the Treasury Board Secretariat (TBS).<sup>133</sup> Most unused funds come from VAC's largest programs, totaling \$4.8 billion, which provide benefits and compensation to veterans. In the last fiscal year, VAC returned close to \$1 billion to the TBS.<sup>134</sup> However, due to administrative limitations, VAC is unable to redirect unused earmarked funds for other programs. For funding proposals attributed to VAC (Policy Recommendations 1.2, 1.3, 3.1, 3.2, 5.1, and 5.2), serious consideration – by VAC and the TBS – should be undertaken to reevaluate VAC's budget structure and reallocate \$216 million, or 23% of unused funds, away from VAC's large and consistently underutilized benefit funds to support the newly proposed programs.

## ADDITIONAL CONSIDERATIONS TO ADVANCE THE RIGHT TO HOUSING

Should Canada seek to comprehensively end chronic veteran homelessness, additional policy actions pertaining to the federal government's commitment to enshrine the right to housing should be considered – not just to the benefit of unhoused veterans but all Canadians. From conversations with stakeholders in the housing development sector, legal experts on human rights, and advocates from homelessness-serving organizations, it is evident that the current National Housing Strategy falls short of meaningfully protecting and promoting the right to housing. Informed by their insights, these policy considerations address gaps in the government's current approach to the housing crisis; while these considerations help to further the development of a thorough veteran homelessness strategy, they also support meaningful policy action to address chronic homelessness for all Canadians.

**Sign the Optional Protocol of the International Covenant on Economic, Social, and Cultural Rights.** Article 11 of the International Covenant on Economic, Social and Cultural Rights (ICESCR) recognizes the right of all individuals to an adequate standard of living, including housing.<sup>135</sup> In 1976, Canada acceded to the treaty, accepting the obligation to implement the treaty's provisions. The Optional Protocol to the ICESCR (OP-ICESCR) allows individuals whose rights are violated or not upheld to present complaints to, and seek remedy from, the UN Committee on Economic, Social and Cultural Rights.<sup>136</sup> However, Canada has failed to become a signatory to the OP-ICESCR, leaving Canadians without the ability to seek remedy for rights violations at the international level. Signing onto the OP-ICESCR would immediately provide Canadians experiencing homelessness or housing precarity, including veterans, an avenue for adjudication.

**Remove the responsibility of NHS implementation from for-profit Crown corporations.** Launched in 2017, the NHS represents Canada's first approach to enshrining the right to housing. Canada has chosen to task state-owned enterprises, like CMHC and CLC, with implementing major parts of the strategy, including the disbursement of billions of dollars of funding through grants and low-interest loans. Yet, despite their commitments to providing affordable housing, these Crown corporations are primarily responsible for producing profits for their largest shareholder: the federal government. Interest garnered from NHS loans contribute to CMHC's and CLC's revenue streams and have proven quite profitable. Last year, from housing assistance programs alone (excluding CMHC's mortgage business), CMHC earned \$277 million in profit.<sup>137</sup> And for the last reported financial year (2021-2022), CLC brought in close to \$32 million in additional profit.<sup>138</sup>

With the increasing financialization and privatization of housing across Canada, there are concerns about the relationship between CMHC administered funds and for-profit developers and investment firms that dominate the home construction sector. The financialization of housing stands in stark contradiction with Canada's efforts to promote the right to housing and poses significant consequences for housing affordability for Canada's most vulnerable populations.<sup>139</sup> The inherent for-profit mandates of Crown corporations, like CMHC and CLC, incentivize decisions that provide the government a return on its investments and support developers who are capable of making a profit. If Canada is serious about promoting the right to housing, Crown corporations cannot be the primary body overseeing the implementation of the NHS.

**Reform national definition for housing affordability.** For Canada to measure housing affordability, it is necessary to have a well-defined definition. However, across various NHS programs, the federal government has adopted inconsistent definitions of housing affordability. Under the NHCF, housing is considered affordable if it is offered at 80% of median market rent.<sup>140</sup> Meanwhile, the Rental Construction Financing Initiative defines affordable rent as less than 30% of median pre-tax family income.<sup>141</sup> In addition to voicing concerns about

different definitions of affordability across NHS programs, several stakeholders have emphasized that these definitions of affordability have lost relevance in the current inflationary market and hold little relevance when creating affordable housing stock for vulnerable populations experiencing homelessness, housing insecurity, and poverty. Federal agencies and Crown corporations currently responsible for the implementation of the NHS should review criteria for affordability, not only for unity, but for relevancy for Canada's most vulnerable and housing insecure populations.

## EVALUATION AND REPORTING

The recommendations in this report aim to build on existing strengths and assets, proposing significant changes to existing programs and policies, as well as the development of new initiatives from the ground up. To ensure the desired outcomes of the recommendations are achieved, it is crucial to include proper evaluation and reporting mechanisms in the planning process. Incorporating accountability measures aligns with the principles of HRBA, reinforcing the progressive realization of the right to housing.

The federal government's existing *Policy on Results*, which outlines accountability and reporting requirements for all federal departments, will encompass the proposed recommendations that directly target various federal departments.<sup>142</sup> Moreover, key stakeholders such as VAC, CAF, DND, Infrastructure Canada, and CMHC already have internal reporting mechanisms, including audit and evaluation reports, as well as requirements for GBA+ analyses.<sup>143</sup> Therefore, it can be assumed that the recommendations presented in this report will align with these existing reporting and evaluation mechanisms.

However, there is currently a lack of comprehensive reporting mechanisms to track the overall progress in addressing veteran homelessness. On a broader scale, the Auditor General has criticized the federal government for the absence of effective measurement and accountability in its efforts to prevent and reduce homelessness.<sup>144</sup>

While the NHS has its own progress reporting, and although veterans have been identified as one of the priority groups within the NHS, neither the quarterly progress reports or the triennial report keeps track of the progress made with respect to addressing veteran homelessness and ensuring the right to adequate housing for veterans.<sup>145</sup> A HRBA to progress reporting on veteran homelessness and veterans' right to adequate housing as part of the NHS reporting mechanisms is essential.

To be grounded in a HRBA, this reporting should go beyond simply measuring the amount of housing units built, the amount of veterans housed or the amount of money invested, and also take into account the criteria of adequate housing identified by the Office of the United Nations High Commissioner for Human Rights: security of tenure, availability of services, affordability, habitability, accessibility, location and cultural adequacy.<sup>146</sup> Additionally, reporting should consider the different subgroups of the veteran population, measuring progress specifically for women and gender-diverse veterans, LGBTQIA2S+ veterans, racialized veterans, Indigenous veterans, veterans with disabilities, Francophone veterans, and other relevant subgroups.

## NEXT STEPS

The recommendations presented in this report aim to support the OFHA in their advocacy efforts with government departments and entities. While the Minister of Housing and Diversity and Inclusion is required to provide a response to recommendations from the FHA within a 120-day timeframe, this report can also serve as a catalyst for advocating policy reform among all federal stakeholders.<sup>147</sup>

Furthermore, the findings and recommendations presented in this report can be used by the FHA to initiate a formal request to the National Housing Council, urging the establishment of a Review Panel specifically focused on addressing veteran homelessness. This Review Panel can serve as a vital accountability mechanism, fostering the active participation of diverse stakeholders, including individuals with lived experience, to collectively explore and propose impactful solutions.<sup>148</sup>

Concurrently, this report seeks to contribute to the knowledge and evidence base that can be utilized by stakeholders and government entities, such as the Standing Committee on Veterans Affairs and civil society organizations, to address and prevent veteran homelessness effectively.

## CONCLUSION

Veteran homelessness is vastly misunderstood by the federal government, which currently lacks the appropriate tools to understand the real magnitude of the issue. Governmental efforts deployed in the past have been misaligned: notwithstanding millions of dollars invested in addressing the issue over the past few years, thousands of veterans are falling through the cracks of the system and find themselves living unhoused or in inadequate housing situations.

No one single solution can fully address veteran homelessness, as housing precarity is a systemic issue with roots that require interventions at all levels – individual, interpersonal, institutional and societal. This is why, in this brief, various policy recommendations have been proposed to address veteran homelessness from a multifaceted perspective, aiming to comprehensively address the entire trajectory of veterans experiencing homelessness, encompassing their entry into the military, their transition to civilian life, and to the period when they face acute homelessness. The recommendations are designed to not only provide solutions for veterans currently experiencing homelessness but to also prevent veteran homelessness altogether.

The implementation of these recommendations is also anticipated to yield outcomes that extend beyond the reduction of veteran homelessness, addressing issues of mistrust and sense of purpose. Additionally, these recommendations are likely to have positive impacts on the health and well-being of veterans by ensuring enhanced support and access to culturally competent care. Lastly, positive economic effects can be anticipated, including alleviating the financial burdens associated with homelessness, facilitating veterans' reintegration into the workforce, and fostering economic stability.

As the FHA and the federal government move forward in their efforts to address veteran homelessness, the adoption of a HRBA must be prioritized. By doing so, people with lived experience must be included. Moving forward, the FHA and the federal government must also implement stringent reporting and accountability mechanisms, especially when engaging with other P/T, municipal jurisdictions and non-governmental actors, to ensure the progressive realization of the right to housing is achieved.

Finally, many levers to addressing housing precarity for the broader population fell outside the scope of this policy challenge. However, to meaningfully address veteran homelessness, the federal government must adopt a holistic approach and work towards ensuring adequate housing for all Canadians.

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## APPENDIX A – STAKEHOLDERS INTERVIEWED

1. Office of the Minister of Housing and Diversity and Inclusion (February 3rd, 2023)
2. Homes for Heroes Foundation (February 8th, 2023, June 26th, 2023)
3. Whitehorse Legion (February 9th, 2023)
4. Veterans House Canada (February 10th, 2023, June 23rd, 2023)
5. Canadian Alliance to End Homelessness (February 10th, 2023)
6. National Right to Housing Network (February 13th, 2023)
7. Canadian Lived Experience Leadership Network (February 13th, 2023)
8. Veterans Affairs Canada (February 15th, 2023, June 15th, 2023)
9. Mission Old Brewery (February 17th, 2023)
10. Honour House (February 17th, 2023)
11. Canadian Armed Forces Housing Agency (February 20th, 2023)
12. Aboriginal Veterans (February 22nd, 2023)
13. Y-Foundation (February 24th, 2023)
14. Atlas Institute for Veterans and Families (February 24th, 2023)
15. Women Veteran Research and Engagement Network (March 6th, 2023)
16. Homes For Heroes Foundation (Board member) (March 6th, 2023)
17. Wounded Warriors COPE (Couples Overcoming PTSD Everyday) Program (March 20th, 2023)
18. Royal Canadian Legion (March 21st, 2023)
19. Canada Lands Corporation (March 22nd, 2023)
20. Centre de recherche de Montréal sur les inégalités sociales, les discriminations et les pratiques alternatives de citoyenneté (March 24th, 2023)
21. Union of Veterans Affairs Employees (March 27th, 2023)
22. Canada Mortgage and Housing Corporation (March 27th, 2023)
23. City of London (March 29th, 2023)
24. Last Post Fund (April 5th, 2023)
25. Office of the Veterans Ombud (April 14th, 2023)
26. Women and Gender Equality Canada (April 20th, 2023)
27. Assembly of First Nations (April 24th, 2023)
28. Rainbow Veterans Canada (April 25th, 2023)
29. Inuit Tapiriit Kanatami (April 27th, 2023)
30. Office of the Minister of Mental Health and Addictions (May 17th, 2023)
31. Infrastructure Canada (June 13th, 2023)
32. HIFIS Service Desk (June 14th, 2023)

## APPENDIX B – LIST OF ACRONYMS

<b>CAF</b>	Canadian Armed Forces
<b>CAF TG</b>	Canadian Armed Forces Transition Group
<b>CHRC</b>	Canadian Human Rights Commission
<b>CLC</b>	Canada Lands Corporation
<b>CMHC</b>	Canada Mortgage and Housing Corporation
<b>CTS</b>	Career Transition Services
<b>DND</b>	Department of National Defence
<b>DTS</b>	Defence Transition Services
<b>ESDC</b>	Employment and Social Development Canada
<b>FHA</b>	Federal Housing Advocate
<b>FLI</b>	Federal Lands Initiative
<b>HIFIS</b>	Homeless Individuals and Families Information System
<b>HMIS</b>	Homeless Management Information Systems
<b>HRBA</b>	Human rights-based approach
<b>HUD</b>	Housing and Urban Development
<b>LGBTQIA2S+</b>	Lesbian, Gay, Bisexual, Transgender, Questioning, Intersex, Asexual and Two-Spirit
<b>NGO</b>	Non-governmental organization
<b>NHCF</b>	National Housing Co-Investment Fund
<b>NHS</b>	National Housing Strategy
<b>NHSA</b>	National Housing Strategy Act
<b>NIOs</b>	National Indigenous Organizations
<b>OFHA</b>	Office of the Federal Housing Advocate
<b>PiT</b>	Point-in-Time
<b>PM</b>	Prime Minister
<b>P/T</b>	Provinces and territories OR Provincial and territorial
<b>PTSD</b>	Post-traumatic stress disorder
<b>RAP</b>	Resettlement Assistance Program

<b>RHI</b>	Rapid Housing Initiative
<b>RCMP</b>	Royal Canadian Mounted Police
<b>SCAN</b>	Second Career Assistance Network
<b>SPACES</b>	Single Persons Accommodation Centre for the Ex-Services
<b>TAP</b>	Transition Assistance Program
<b>TBS</b>	Treasury Board Secretariat
<b>TC</b>	Transition Centres
<b>VA</b>	Veterans Affairs ( <i>US</i> )
<b>VAC</b>	Veterans Affairs Canada
<b>VAC Ombuds</b>	Office of the Veterans Ombuds
<b>VHCP</b>	Veteran Housing Certificate Program
<b>VSOs</b>	Veterans-serving organizations
<b>WWII</b>	World War II

## APPENDIX C – TRANSITION

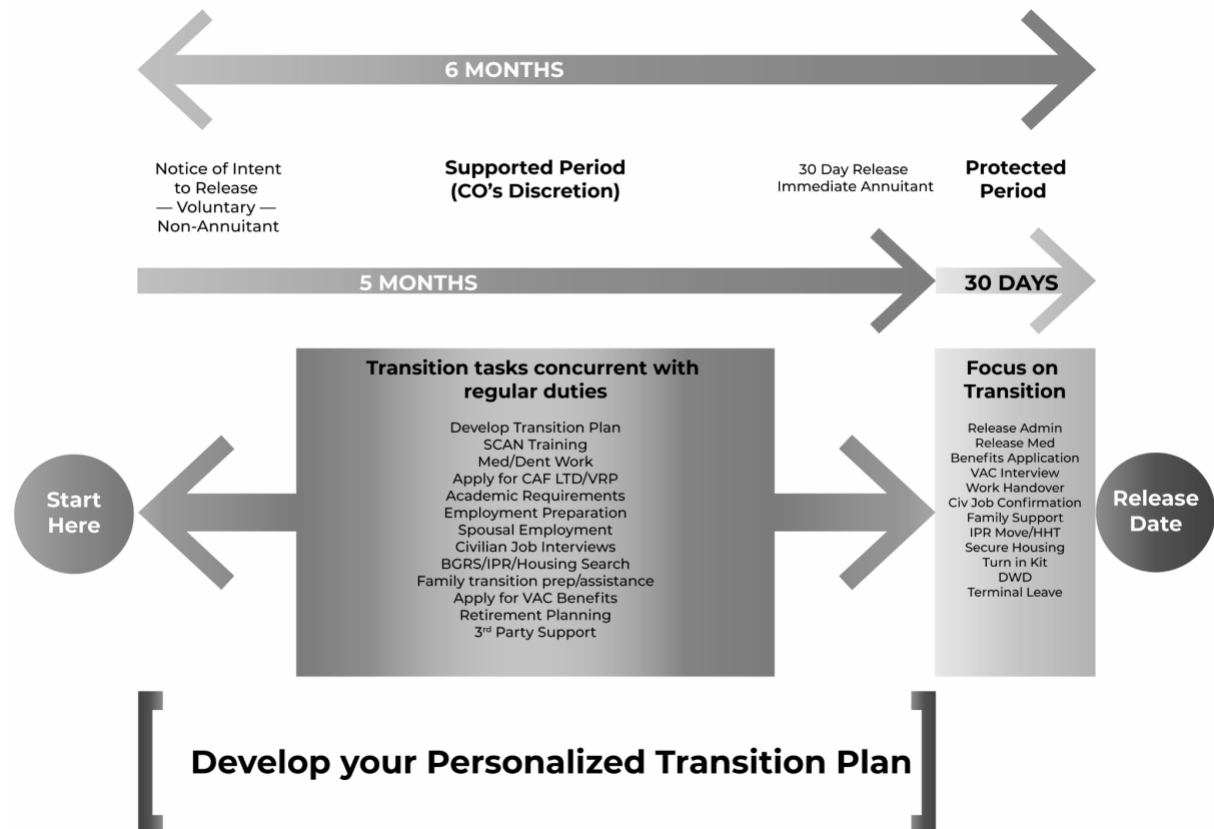
**Table 2: Description of existing transition programs and supports in Canada, US, UK and Australia**

Country	Description of existing transition programs and supports
Canada	<p>In 2019, CAF implemented its initial transition program.<sup>149</sup> In 2020, Canada's Defence Policy <i>Strong, Secured, Engaged</i> identified pathways to improve the transition experience of serving members and better prepare them for civilian life. This led to the development of the CAF Transition Group (CAF TG) as well as the identification of Transition Centres (TC).<sup>150</sup> The only 32 TC located across Canada are supposed to be "one-stop centres" that will, once fully operational, offer standardized and personalized transition services to CAF members, veterans, and their families.<sup>151</sup> VAC representatives are available at the TC to provide information about available benefits and services and provide assistance with application.</p> <p>Many additional transition programs and supports were also developed, such as: as the My Transition Guide<sup>152</sup>; a transition-related website<sup>153</sup> and mobile app<sup>154</sup>; the Second Career Assistance Network (SCAN)<sup>155</sup>, which offers in-person two-days seminars<sup>156</sup>, as well as short videos online that touch on topics such as available CAF and VAC services and benefits, and basic financial considerations to keep in mind during release; the Enhanced Transition Training course<sup>157</sup>, which all transitioning CAF members are required to take and is an online training covering essential information related to transition; and a recommended 6-months transition period as well as a 30-day protected period.<sup>158</sup> One-on-one support during transition is under the responsibility and at the discretion of Commanding Officers.<sup>159</sup> CAF's recommendation of what the transition period and the protected period should be devoted to can be found below (see <i>Figure 1</i>).</p> <p>Prior to release, serving members need to complete three-steps release interviews realized by CAF, starting a month prior to the date of release.<sup>160</sup> The first step takes place a month prior to release and focuses mostly on medical clearance processes and reviewing the pension benefit estimate. The second step is to assess progress and confirm adequate steps have been taken with respect to transition. The last step takes place on the date of release and mostly consists of exchanging relevant documentation. For example, it is when the CAF Identification Card is being collected in exchange for the Veteran Service Card.<sup>161</sup> Different from the release interviews, there also exists a VAC Transition Interview, which is not compulsory.<sup>162</sup> Veterans need to reach out to VAC to schedule such interviews. During this interview, veterans will receive information about available VAC benefits and services.</p> <p>To support reintegration into the workforce, VAC provides Career Transition Services (CTS). CTS are provided by a third-party service provider contracted by VAC which offers three types of services: labour market information, career counseling, and job-finding assistance. In a survey filled by veterans using CTS for the audit report of the <i>Evaluation of the Career Transition Services Program and the Education and Training Benefit</i>, many respondents identified that CAF members are not aware of the existence of the programs while in service. It was recommended that CTS should be promoted while members are still in the military, prior to discharge, to adequately prepare them for employment upon release.</p>

	Regarding financial literacy, VAC doesn't offer any specific courses or training. The only resources available online are redirections towards other websites, such as generic tools developed by the Government of Canada, or various credit counseling organizations across Canada. <sup>163</sup>
US	<p>In the US, it is recommended that the transition process starts two years prior to retirement, but members must begin their transition process at least 365 days prior to retirement or, if they are demobilized with less notice, as soon as they are made aware of their retirement. The US Transition Assistance Program (TAP) is provided directly on military installations as well as virtually, and includes three main components: counseling, curriculum, and a capstone event.</p> <ul style="list-style-type: none"> <li>- Counseling: During an individualized initial counseling session, service members are required to complete a personal self-assessment. They then begin to develop their individual transition plan. Following the initial counseling session, pre-separation counseling starts and covers information related to available benefits and resources. Caregivers and spouses are encouraged to participate in counseling.</li> <li>- Curriculum: The "outcome-based modular curriculum" aims to prepare service members for their military-to-civilian-life transition. It covers topics such as available services and benefits for veterans, community integration, social, emotional and mental health, employment, education and financial planning. The curriculum is reviewed annually by the TAP Interagency Partnership.</li> <li>- Capstone: During the capstone event, commanders verify the transition readiness of service members, including the viability of their individual transition plan, as well as conformity to career readiness standards. The capstone event must happen at the latest 90 days prior to release. Following the readiness assessment, service members can access additional assistance if required or needed.<sup>164</sup></li> </ul>
UK	<p>In the UK, the Defense Transition Services (DTS) were established, in 2019, following the adoption of the Minister of Defence's Holistic Transition Policy.<sup>165</sup> DTS provides individualized support for members and their families who need extra support as they leave the armed forces. The support covers elements related to physical and mental health, substance use, education and employment, housing, finance, and benefits. Among other things, the UK DTS offers a series of briefings on civilian housing annually. These briefings cover topics such as home ownership, private rental, social housing, financial advice, and affordable housing programs. The UK also has a program called the Single Persons Accommodation Centre for the Ex-Services (SPACES), which is "designed to help single service leavers find appropriate accommodation when they leave. Through this service, the project reduces the likelihood of ex-services personnel becoming homeless or sleeping rough after discharge."<sup>166</sup> Similar to CTS, the UK Ministry of Defence also has its own Career Transition Partnership (CTP), which offers support in the format of career counseling, skills development workshop, vocational training courses, online career tools and resources, and more.<sup>167</sup></p>

Australia	<p>In Australia, through the Defence Force Transition Program (DFTP), serving members have access to a series of resources up to 24 months after their release, including transition coaches which offer individualized support to serving members to support their transition, transition programming that covers job search, career transition training and approved absence, a clearance session prior to release, and post-transition surveys every three months.</p> <ul style="list-style-type: none"> <li>- Transition coaches offer individualized support to serving members to prepare their transition.<sup>168</sup> This includes the design of a personal transition plan, the obtention of all required documentation (e.g. service and medical records), referrals to relevant supports where required, etc. Up until 2 years after release, transition coach stay in touch with newly-released veterans by phone calls or email check-ins.</li> <li>- The transition programs include<sup>169</sup>:             <ul style="list-style-type: none"> <li>- Job Search Preparation Workshops, which are in-person 2-day workshops or virtual 8-hour workshops that cover skills such as how to build a resume and how to apply for jobs, and provide access to online resources.</li> <li>- Career Transition Training and Coaching: Funds are made available to access training and upskilling. Additionally, specialist coaching will assist transitioning members in identifying motivators and career options, developing an employment plan, developing interview skills, building a resume, and adjusting to civilian employment environments.</li> <li>- Personalized Career and Employment Program: This program provides 3-month career development and job placement support, as well as six individual coaching sessions with an employment specialist. This program is specifically targeted to members who served short-term and left against their own volition (e.g. for disciplinary reasons, due to an injury, etc.).</li> <li>- On The Job Experience: This program provides unpaid work experience in a chosen post-transition field. During this unpaid work experience, transitioning members continue to be paid by the Minister of Defence.</li> <li>- Financial advice: This program provides funds to veterans to access financial advice to support their financial planning efforts after transition.</li> </ul> </li> <li>- Approved Absence: Australian Defence Force members can apply for approved leave to complete activities related to their transition, such as searching for accommodation, completing job interviews, gaining work experience, etc.</li> <li>- A clearance session is conducted prior to the release of serving members to confirm they are ready for transition.</li> <li>- Newly released members also receive a post-transition survey every three months for two years following their release.<sup>170</sup></li> </ul> <p>Additionally, Australian serving members and their families have access to the program Stepping Out, provided by the organization Open Arms - Veterans and Family Counseling.<sup>171</sup> This program is available to all serving members and their families, any time before discharge and up until 12 months after release. This 2-day program aims to support members in planning their life after the Australian Defence Force; teach them techniques to stay motivated; teach them the skills to properly adapt to civilian life; offer guidance and support with respect to relationships; and support members in finding mental and physical services.</p>
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Figure 1: CAF's current 6-months transition period and 30-days protected period<sup>172</sup>

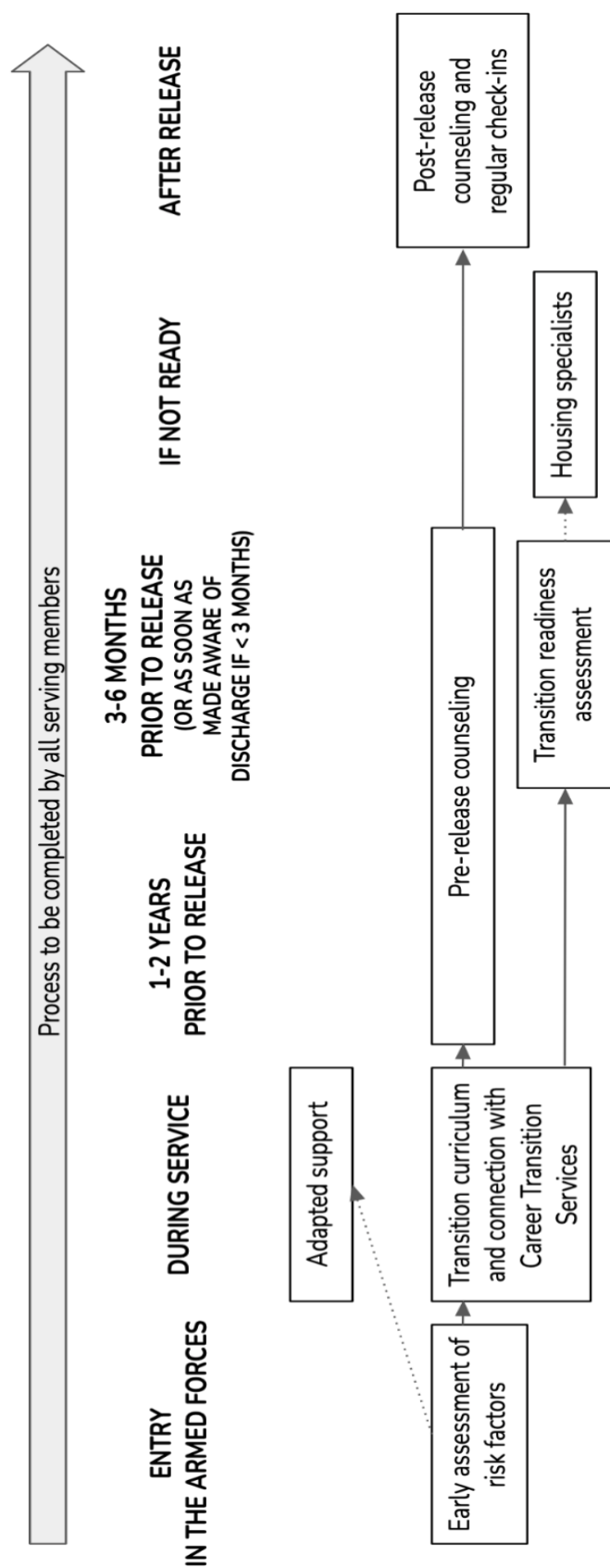


**Table 3: Recommended enhancements to the existing CAF-VAC transition program**

When	Proposal	Supporting evidence
Entry in the armed forces	<p>The military-to-civilian-life transition starts the moment one joins the armed forces.</p> <p>Some members enter the armed forces with preexisting factors for homelessness (see <i>Recommendation 2.3</i>). Following the implementation of data collection and the development of a knowledge base around these risk factors in the Canadian context, it is recommended that CAF and VAC collaborate to develop specific programming and supports aimed at addressing these risk factors and building protective factors during service.</p>	Stakeholder interviews <sup>173</sup> ; US literature <sup>174</sup>
During service	<p>The transition curriculum should start to be completed early during service, not only during the currently existing 6-months transition period. In addition to covering topics such as available services and benefits provided by CAF and VAC which are already covered by the Second Career Assistance Network (SCAN), the transition curriculum should also focus specifically on preventatively covering the following topics: challenges of transition, financial literacy, knowledge about how to find and maintain housing (e.g., available home ownership programs, private rental market, social housing, available community services such as food banks, financial planning advice, etc.), career support (e.g., job search, how to build a resume, etc.); community integration, mental health literacy, and continuing education to support the development of transferable skills.</p> <p>Connections to the CTS should happen directly during service to address lack of awareness of the existence of this program.</p> <p>To increase accessibility, the transition curriculum should be provided directly on military installations and be made available virtually.</p>	Audit report of the <i>Evaluation of the Career Transition Services Program and the Education and Training Benefit</i> <sup>175</sup> ; US TAP curriculum; UK DTS; UK CTP; Australia DFTP; Stakeholder interviews <sup>176</sup>
1-2 years prior to release	<p>One to two years prior to the identified date of release, soon-to-be-released members should start pre-release counseling. Counseling should already involve VAC case managers to ensure individualized support, as well as continuity of care following release. The pre-release counseling should notably include: a personal assessment of transition readiness by the serving member; the development of an individual transition plan with identified needs and goals; and the reiteration of available services, benefits and resources provided by CAF and VAC, as well as VSOs, following release.</p> <p>Caregivers and spouses are encouraged to attend pre-release counseling, if desired by the serving member.</p>	US TAP

<p>3-6 months prior to release (or as soon as made aware of discharge if under 3 months)</p>	<p>In the already existing 6-months transition period, the pre-release counseling should more specifically address the following elements: review the individual transition plan; support the soon-to-be-released member in opening up a VAC account and filling in the forms for all benefits to which they are eligible; support the serving member in finding housing for when they are released; support the serving member in establishing outreach for community engagement; and support the serving member in accessing all medical records needed and transitioning between health systems and completing outreach for health care and mental health care professionals where needed.</p> <p>Additionally, in this period, the soon-to-be-released member should undergo a transition readiness assessment, completed jointly by TC and VAC case managers. This assessment notably confirms registration to VAC, that adequate housing has been secured, and the attainment of career readiness standards.</p> <p>Here, it is important to ensure that all newly released veterans become clients of VAC, in line with Recommendation 1.2.</p> <p>Additional support is available following the transition readiness assessment if required (<i>see below</i>).</p>	<p>US TAP; UK SPACES; Australia DFTP</p>
<p>If the serving member is deemed not ready to transition out</p>	<p>If soon-to-be-released members are deemed unfit to transition, for example if they haven't secured housing or if it is expected that the soon-to-be veteran will experience challenges in maintaining housing, additional support should be made available. It is recommended that VAC case managers completing the transition readiness assessment connect members to newly established VAC housing specialists (<i>see Recommendation 3.1</i>) that would provide individualized support in connecting with housing supports. If relevant, members will access housing certificates.</p>	<p>US TAP</p>
<p>After release</p>	<p>Veterans should continue to receive support by their pre-release counselors (VAC case managers) following their release, as long as needed. This will enable them to continue accessing individualized support while they reintegrate the workforce, transition between health systems, etc.</p> <p>Regular check-ins following transition should also be conducted by VAC with all veterans to continuously assess their needs and be able to provide appropriate support. This also supports Recommendation 1.2.</p> <p>Ongoing support following release is particularly relevant considering that veterans experiencing homelessness tend to fall into homelessness later down the line – in average, ten years after being released from the military.</p>	<p>Australia DFTP</p>

Figure 2: Recommended revamped transition program



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- <sup>175</sup> Veterans Affairs Canada. May 2022. *Evaluation of the Career Transition Services Program and the Education and Training Benefit*. <https://www.veterans.gc.ca/eng/about-vac/publications-reports/reports/departmental-audit-evaluation/2022-evaluation-career-transition-education-training-benefit>.
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[REDACTED]