INTENTIONAL COMMUNITY CONSORTIUM

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BRIEFING NOTE

Urgent Policy Change:

Include Developmental Disabilities in BCH Supportive and Transitional Housing Stream and

Preserve the NHS 2.0 Carve-Out for Individuals with Developmental Disabilities

The Issue

People with intellectual and developmental disabilities must not have to become homeless before qualifying for federal supportive housing funding.

Build Canada Homes has indicated that **HICC establishes the policy governing BCH eligibility**. Accordingly, the necessary policy language change must come from HICC.

Current BCH Eligibility Criteria

As communicated by **BCH**, projects under the Supportive and Transitional Housing stream must:

1. Serve individuals experiencing homelessness or at imminent risk of homelessness within **two weeks**.
2. Provide housing affordable to people with low or very low incomes.
3. Prioritize tenants through the local homelessness-serving system.
4. Demonstrate confirmed operating and maintenance funding.
5. Demonstrate confirmed funding for wraparound supports.

These are the eligibility requirements communicated by BCH, rather than a quotation from a formally published program definition.

While appropriate for homelessness-focused projects, these criteria exclude many people with developmental disabilities who need permanent, deeply affordable, accessible housing with ongoing supports but are not yet homeless.

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The Evidence: A Growing Housing Crisis

The waiting-list crisis: Ontario's Ombudsman reported that **28,500 people were waiting for developmental-services supportive living in 2024**, compared with fewer than 24,000 in 2020. Demand is growing while the number of people served has remained largely unchanged.

Developmental disabilities and homelessness: Sector research and advocacy reports demonstrate that **more than 18% of people in shelters have a diagnosed or undiagnosed developmental disability**.

Aging caregivers, an approaching crisis: We are witnessing a generation of adults with developmental disabilities living longer and increasingly **outliving their parents and primary caregivers**. Many remain in family homes because suitable supportive housing is unavailable. As caregivers age, become ill, or die, these individuals face sudden displacement, homelessness, hospitalization, or inappropriate institutional placement.

Inappropriate Housing and High-Risk Individuals: Due to the severe shortage of purpose-built, community-based supportive housing, many people with intellectual and developmental disabilities are inappropriately placed in hospitals as **Alternative Level of Care (ALC) patients or in Long-Term Care (LTC) facilities**, despite not requiring these levels of care. Others remain in unstable or unsuitable family living arrangements, facing imminent displacement as aging caregivers can no longer provide support.

Under current BCH eligibility criteria, individuals in hospitals as ALC patients, in Long-Term Care facilities, or in unsuitable family homes may be considered "housed" and therefore excluded from supportive housing funding, despite their urgent and well-documented needs.

HICC must explicitly recognize people with developmental disabilities who are inappropriately housed, designated ALC, living in Long-Term Care, or at high risk of housing instability as a priority population, regardless of their current homelessness status.

Being housed does not mean being appropriately housed.

The current approach effectively waits for a family crisis before recognizing a legitimate housing need.

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Urgent Required Policy Change:

HICC must direct an amendment to BCH's supportive and transitional housing eligibility criteria to explicitly state developmental disabilities as a distinct pathway, independent of homelessness status.

Proposed Definition:

Supportive Housing means permanent, deeply affordable, accessible housing combined with individualized supports that enable people to live safely and inclusively in their communities. Eligible populations include people experiencing or at risk of homelessness **and people with intellectual and developmental disabilities who require ongoing housing-related supports, regardless of their current homelessness**.

Developmental Services Ontario and qualified developmental-service providers must be recognized as legitimate referral and prioritization pathways, alongside homelessness-serving systems. Appropriate operating and support-funding commitments should remain required.

Additional Important Policy Change:

NHS 2.0 — Protect the Developmental Disabilities Carve-Out

Developmental disabilities must continue to have an explicit, dedicated carve-out in NHS 2.0.

This must include identifiable capital funding, eligibility criteria and access pathways for deeply affordable, accessible, permanent supportive housing.

A general commitment to persons with disabilities is not enough. Without dedicated recognition and funding, people with developmental disabilities risk being excluded once again by programs designed primarily around homelessness.

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Conclusion: Three Specific Federal Actions Requested

1. **HICC:** Amend BCH Supportive and Transitional Housing policy to include people with developmental disabilities who require permanent supportive housing, whether or not they are homeless. (Immediate Priority)
2. **HICC and federal decision-makers:** Preserve a dedicated developmental-disabilities carve-out within NHS 2.0, including a clear capital-funding pathway.
3. **Federal and provincial governments:** Coordinate capital, operating and individualized support funding so projects can proceed before families reach crisis.

The Bottom Line

Homelessness is not the only measure of housing vulnerability.

Canada already has thousands of people waiting for supportive living, families aging beyond their capacity to provide care, and people with developmental disabilities entering homeless shelters.

Canada must invest in preventing homelessness, caregiver collapse and institutionalization — not make these crises prerequisites for supportive housing.

The policy change belongs with **HICC**, and it is urgently needed.

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