

EVALUATION OF THE ON-RESERVE
RENOVATION PROGRAMS AND
THE ON-RESERVE NON-PROFIT
HOUSING PROGRAM (SECTION 95)

Management Response and Action Plan (MRAP)



Evaluation of the On-Reserve Renovation Programs and the On-Reserve Non-Profit Housing Program (Section 95) – Management Response and Action Plan (MRAP)

Evaluation findings, recommendations, and MRAP approved at CMHC’s Executive Committee on: August 8th, 2023.

Recommendation	Management Response	Action Plan	Responsibility		Timeline
			Lead	Support	
<p>Recommendation 1:</p> <p>To better align with the priorities of First Nations communities, adopt a more needs-based approach which:</p> <p>a. offers the possibility for multi-year and/or block funding for First Nation communities;</p> <p>b. further simplifies the suite of Renovation Programs;</p> <p>c. proposes to Indigenous Services Canada and the Assembly of First Nations a revision of the national allocation formula that reflects the latest needs data, particularly for underserved regions; and,</p> <p>d. incorporates lessons learned from the pilot currently underway to enhance partnerships with First Nations.</p>	<p>We agree with this recommendation.</p> <p>We recognize the need for reform of these programs. It is our intention to pursue a co-developed policy process to achieve meaningful program reforms, informed by the needs and objectives of First Nations partners.</p> <p>Indigenous Services Canada is working with First Nations to reform their delivery of housing and infrastructure programs. This work has implications for CMHC First Nation housing programs. At this time, Canada Mortgage and Housing Corporation (CMHC), does not have a mandate to transfer CMHC First Nation housing program funding to First Nations.</p> <p>However, through the <i>United Nations Declaration on the Rights of Indigenous Peoples Act Action Plan</i>, CMHC has committed to continue to explore options with First Nations on their proposal to exercise their jurisdiction over their housing and for Canada Mortgage and Housing Corporation to transfer the care and control of funding for on-reserve housing programs to First Nations, and we are investing in research projects, co-developed with the Assembly of First Nations (AFN) to inform future policy advice for CMHC on-reserve program reforms, including their potential transfer.</p>	<p>1a)</p> <p>Action 1: A multi-year funding model would require an amendment of our current authorities. Amendments will be pursued based on the outcome of our work with First Nations to explore and co-develop options for future reform and transfer of programs.</p>	Policy — Indigenous Policy	Housing Programs — Sector Operations	Q4 2025
		<p>1b)</p> <p>Action 1: Conduct a review of the program authorities/design to determine if a universal renovation program is possible along with an analysis by Indigenous and Northern Housing Solutions on the take-up of the different streams to determine if some need to be combined/eliminated or if the processes supporting each stream can be further simplified to support efficiency for First Nations and implementation by INHS.</p>	Housing Programs — Sector Operations	Housing Programs — Indigenous and Northern Housing Solutions	Q1 2024
		<p>1c) and 1d)</p> <p>Action 1: Consider options for revised funding allocation processes and incorporate lessons learned in a future proposal on the transition towards transfer of programs/funding to First Nations.</p>	Policy — Indigenous Policy	Housing Programs — Indigenous and Northern Housing Solutions	Q4 2025

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<p>Recommendation 2:</p> <p>Revise program guidelines to promote greater flexibility and better align with First Nation priorities.</p>	<p>We agree with this recommendation.</p> <p>Revising program guidelines to remove barriers and make the program simpler to navigate while aligning with First Nation priorities is logical. Where possible, we will make those updates to the Operational Policy guidelines.</p> <p>We recognize that the available funding amounts for both the Section 95 and the Renovation Programs do not meet the needs identified by First Nations and will limit the impact possible through program guidelines amendments.</p> <p>CMHC will be seeking opportunities for a larger program reform, which could include direct engagement with First Nations on CMHC's Legacy Programs, that will also address Recommendation 1 and 2 of this MRAP in better meeting the needs of First Nations and aligning with their priorities.</p>	<p>2a) RRAP Standards</p> <p>Action 1: Analyze documentation and authorities to determine if changes to RRAP Standards would require changes to policy authorities.</p> <p>Action 2: Based on findings of Action 1, either update the RRAP guidelines to reflect the current environment or analyze the elimination/replacement of the Standards.</p>	<p>Housing Programs — Sector Operations</p>	<p>Housing Programs — Indigenous and Northern Housing Solutions</p>	<p>Q1 2024</p>
		<p>2b) Minimum Health and Safety Standards</p> <p>Action 1: Analyze Minimum Health and Safety Standards to determine what should be changed to better support First Nations' utilization of the program and avoid cost overruns.</p> <p>Action 2: Update Minimum Health and Safety Standards to better support First Nations' utilization of the program and avoid cost overruns as able within current program authorities.</p> <p>Action 3: Identify Minimum Health and Safety Standards reforms that would better support First Nations' utilization of the program and avoid cost overruns but would require changes to policy authorities.</p> <p>Action 4: Pursue amendments to current program authorities as applicable.</p> <p>Action 5: Respond to the need for enhanced flexibility and alignment with First Nation priorities through the Renovation Program Review work underway, which is a project aiming at improving the delivery, application and advancing of funds, resulting in a streamlined approach to program delivery for First Nations.</p>			

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		<p>2c) Modesty criteria</p> <p>Action 1: Review the use of Maximum Unit Price (MUP) and its value for the Section 95 program against additional flexibilities that will support First Nation housing goals.</p> <p>Action 2: If there is an alternative to MUP or if the modesty criteria can be eliminated or replaced, we will move forward with those changes.</p>	Housing Programs — Sector Operations	Housing Programs — Indigenous and Northern Housing Solutions	Q1 2024
		<p>2d) Cost-benefit model</p> <p>Action 1: Review the INHS Playbook to determine if support for these conversations exists for Client Solutions Specialists in the Playbook.</p> <p>Action 2: If it's found that text to support these conversations is missing, it will be added to the Playbook.</p> <p>Action 3: Explore the potential for developing a cost-benefit model to be included in external program documentation.</p> <p>Action 4: If a decision-making tool like a cost-benefit model does not exist or is not accessible to First Nations already, INHS will develop and include in external program documentation (i.e., Section 95 Delivery Guide).</p>	Housing Programs — Indigenous and Northern Housing Solutions		Q1 2024