



# Evaluation of the Shelter Enhancement Program (SEP) On-Reserve

December 2018

## Table of Contents

Acronyms and Abbreviations	3
Executive Summary	4
1 Introduction	7
1.1 Overview	7
1.1.1 Structure of the Report	7
1.2 Program Profile	8
1.2.1 Program Description	8
1.2.2 Program Objectives	10
1.3 Evaluation Background	10
1.3.1 Evaluation Scope	10
1.3.2 Evaluation Questions	11
1.3.3 Evaluation Methodology	12
1.3.4 Evaluation Limitations	13
2 Evaluation Findings	14
2.1 Relevance	14
EQ 1: Is there a continuing need for a program to fund the construction and renovation of shelters for persons fleeing domestic violence in Indigenous communities on-reserve?	14
EQ 2: How do the intended outcomes of SEP On-Reserve align with federal government and CMHC priorities?	21
2.2 Effectiveness	25
EQ 3: To what extent has SEP On-Reserve supported increased availability of and accessibility to shelters?	25
EQ 4: To what extent has SEP On-Reserve facilitated increased availability of and accessibility to second stage (transitional) housing for persons fleeing domestic violence?	32
EQ 5: To what extent has SEP On-Reserve contributed to increased safety and improved shelter services for clients?	36
EQ 6: To what extent has SEP On-Reserve contributed to improved community response to domestic violence?	39
2.3 Economy and Efficiency	40
EQ 7: Is SEP On-Reserve being delivered to stakeholders in an economic and efficient manner?	40
EQ 8: Are there more economic and efficient ways to design SEP On-Reserve?	45
Appendix A: Key Definitions	50
Appendix B: Theory of Change	52
Appendix C: Evaluation Matrix	53
Appendix D: First Nation Communities Interviewed	54
Appendix E: Bibliography	55

## Acronyms and Abbreviations

<b>ACRS</b>	Asset Condition Reporting System
<b>Admin</b>	Administrative or administration
<b>CMHC</b>	Canada Mortgage and Housing Corporation
<b>EOI</b>	Expression of Interest
<b>EQ</b>	Evaluation question
<b>FN</b>	First Nation
<b>FVI</b>	Family Violence Initiative
<b>FVPP</b>	Family Violence Prevention Program
<b>FY</b>	Fiscal year
<b>GBV</b>	Gender-based violence
<b>GoC</b>	Government of Canada
<b>GSS</b>	General Social Survey
<b>INAC</b>	Indigenous and Northern Affairs Canada
<b>ISC</b>	Indigenous Services Canada
<b>KI</b>	Key informant interviews
<b>MLG</b>	Ministerial Loan Guarantee
<b>NIMMIWG</b>	National Inquiry into Missing and Murdered Indigenous Women and Girls
<b>NHS</b>	National Housing Strategy
<b>O&amp;M</b>	Operations and Maintenance
<b>SEP</b>	Shelter Enhancement Program
<b>TBS</b>	Treasury Board Secretariat

## Executive Summary

This report presents the results of the evaluation of the Shelter Enhancement Program On-Reserve (SEP On-Reserve) conducted by Evaluation Services, Audit and Evaluation Sector at Canada Mortgage and Housing Corporation (CMHC).

This evaluation was undertaken as part of the CMHC's Five-Year Evaluation Plan (2018 to 2022). The evaluation examined the relevance and effectiveness, as well as the economy and efficiency of SEP On-Reserve, from FY 2007-08 through 2016-17 with an emphasis on program operations from the last five years. This Evaluation was conducted in accordance with the Program Evaluation Standards adopted by the Canadian Evaluation Society.

## Program Description

SEP On-Reserve supports persons fleeing violence in First Nation communities by offering financial assistance for:

- the acquisition or construction of shelters and second-stage (transitional) housing; and
- the repair, rehabilitation, and improvement of existing shelters and second stage (transitional) housing;

This is done through the provision of forgivable loans to eligible First Nations. The intended outcomes of the program are:

- increased emergency housing options available to persons fleeing domestic violence;
- increased second-stage housing options available to persons fleeing domestic violence; and
- improved safety and support for persons fleeing domestic violence.

The overall finding of the evaluation is that SEP has been able to achieve these intended outcomes to the extent possible within the available budget. However, additional funding is needed to address the level of need. Specific findings follow:

## Relevance

The evaluation determined that there is a continued need to fund the construction and renovation of shelters for persons fleeing domestic violence in Indigenous communities. There is a critical need to increase the supply of shelters and second stage housing, and an identified on-going need for funding for repairs and renovations for shelters.

The intended outcomes of SEP are aligned with Government of Canada and CMHC priorities. The evaluation found that there is no dedicated funding to grow and maintain Canada's network of shelters and transitional housing for persons fleeing violence in First Nation communities beyond March 31, 2019. It is unclear the extent to which shelters and second stage housing on-reserve will be served under the National Housing Strategy or under the First Nations Housing and Infrastructure Strategy.

## Effectiveness

SEP had a moderate impact on shelter availability during the study period. CMHC funding under SEP New Construction was estimated to have had a 7% increase on the availability of units/bed-units during the period of study, while CMHC funding through SEP Renovation was estimated to have reached approximately 91% of the overall stock of units/bed-units for shelters and second stage housing.

SEP was found to have had a minimal impact on both geographic and physical accessibility. Over the study period, SEP New Construction had a minor impact to geographic accessibility, contributing to a maximum potential decrease in the average travel distance by no more than 5%. Further, though about half of shelter operator respondents perceived that their shelter was "successful" or "very successful" in providing accessibility to persons with disabilities, half of shelter operators perceived that SEP did not contribute to their ability to provide physical accessibility, with the majority of these respondents having been recipients of SEP Renovation funding.

SEP had a moderate impact on contributing to increased safety and improved shelter services to clients. Both SEP and Indigenous Services Canada's Family Violence Prevention Program (FVPP) contribute to the outcome of increased safety, as the guidelines for both programs include eligible work that support increased safety. SEP contributes to this outcome indirectly through the program's support for physical improvements or enhancement to the shelters and second stage housing facilities. Congruently, shelter services are covered by the operating funds provided through FVPP. The evaluation found that 53% of shelter operator respondents perceived that SEP contributed positively towards the provision of a safe and secure space for clients, while shelter operator respondents were mixed in their perceptions of SEP's contribution to improved shelter services for clients.

SEP had a positive impact on the communities' responses to domestic violence; however, SEP's contribution in supporting this impact was perceived differently depending on the respondent category. The evaluation found that SEP New Construction recipients perceived the program as having contributed positively to improve community response to domestic violence, while SEP Renovation recipients largely perceived that the program did not have a contribution. It is possible that the impact of renovations may go unnoticed compared to those impacts of a newly constructed building as renovations ensure the physical building is sound, but may not change or necessarily improve a facility's ability to respond to domestic violence.

### Economy and Efficiency

The evaluation found that SEP has the potential to be delivered in a more economic and efficient manner. It was identified that the lack of a clear and integrated approach between SEP and FVPP may be inhibiting the economic and efficient delivery of the program, as well as inhibiting the ability of the program to maximize its achievement on outcomes. It was further found that though promotion of the program to prospective clients was efficient, it could be more effective. However, it should be noted that any increase in promotion could lead to an increase in demand that the current limited budget would be unable to satisfy.

Further, the evaluation found that there is potential to improve the economy and efficiency of program delivery through adjustments to the program's design. Key findings regarding program design include the following:

- SEP could be made more economic and efficient through the provision of long-term, predictable and dedicated funding.
- The current design of SEP is not intended to respond to all Indigenous persons fleeing violence.
- The current design of SEP does not allow for alternative approaches beyond the traditional shelter and second-stage model (e.g., rent supplements, shelter allowances, or holistic, community-based approaches).

This may limit efficient achievement of program outcomes and objectives.

## Recommendations and associated findings

Recommendation	Associated findings
<p><b>Recommendation 1:</b> CMHC should consider working with ISC and other relevant partners, as appropriate, to seek long-term dedicated funding, streamline program administration, and clarify the roles and responsibilities related to shelters and second stage housing for all persons in Indigenous communities fleeing violence in the context of government direction on Canada's renewed relationship with Indigenous Peoples.</p>	<ul style="list-style-type: none"> <li>• There is a critical need to increase the supply of shelters and second stage housing (EQ1, Finding 3);</li> <li>• There is an on-going need for funding to repair shelters (EQ1, Finding 4).</li> <li>• The lack of a clear and integrated approach between SEP and FVPP may inhibit economic and efficient delivery of the program (EQ 7, Finding 4).</li> <li>• SEP could be made more economic and efficient through the provision of long-term, predictable and dedicated funding to support the achievement of outcomes. (EQ8, Finding 1).</li> <li>• The current design of SEP is not intended to respond to all Indigenous persons fleeing violence (EQ 8, Finding 3)</li> </ul>
<p><b>Recommendation 2:</b> CMHC should consider working with ISC and other relevant partners, as appropriate to confirm common outcomes and define integrated key performance indicators for SEP and FVPP (or any successor program or initiative related to shelters and second stage housing).</p>	<p>The lack of an integrated approach between SEP and FVPP may inhibit economic and efficient delivery on outcomes (EQ7, Finding 5).</p>
<p><b>Recommendation 3:</b> CMHC should consider undertaking a review of whether SEP would more effectively and efficiently achieve program outcomes through inclusion of alternative approaches within the design of the program (or any successor program or initiative related to shelters and second stage housing).</p>	<p>The design of SEP does not allow for alternative approaches beyond the traditional shelter and second-stage housing model. This may limit efficient achievement of program outcomes and objectives. (EQ8, Finding 4).</p>

These recommendations are made in the context of broader and continuing discussions on delivery of programs and services to Indigenous Peoples. The Management Response and Action Plan will reflect these considerations.

# 1 Introduction

## 1.1 Overview

This is the report of the evaluation of Canada Mortgage and Housing Corporation's (CMHC) Shelter Enhancement Program On-Reserve (herein referred to as SEP). This evaluation was undertaken as part of the Canada Mortgage and Housing Corporation (CMHC) Five-Year Evaluation Plan (2018 to 2022). This evaluation was conducted in accordance with the Program Evaluation Standards adopted by the Canadian Evaluation Society and was guided by the Treasury Board Secretariat (TBS) *Policy on Results* (2016). The purpose of this evaluation is to provide a credible, reliable and timely assessment of SEP On-Reserve that will:

- Provide information that is useful to the development of future policy and program directions; and,
- Respond to Treasury Board reporting commitments.

This report presents findings on relevance and effectiveness, as well as economy and efficiency covering the reporting period FY 2007/08 through 2016/17.

Findings from previous evaluations of SEP found:

- *Shelter Enhancement Program, Evaluation Report* (September 2009). This evaluation identified a continuing need for additional shelters and spaces, as well as continued relevance for a program to fund additional shelters and repairs in First Nations and other Aboriginal communities. The evaluation concluded that the program has had a positive impact on First Nations.
- *Shelter Enhancement Program Evaluation* (March 2002). This evaluation found that SEP had significant positive impacts in improving shelter conditions, and noted a continued need for additional shelters and second stage housing.

The evaluation was supported by a Working Group comprised of senior staff from CMHC and Indigenous Services Canada (ISC).<sup>1</sup> The mandate of the Working Group was to inform the evaluation process, to share information on progress and results of the evaluation to the Steering Committee, and to enable participants to provide insight and feedback to the Evaluation Services division at CMHC. The Steering Committee consisted of CMHC senior management and provided strategic direction and leadership related to the evaluation.

### 1.1.1 Structure of the Report

The report is divided into three key sections. The Executive Summary provides an overview of the program, the evaluation and a summary of the evaluation findings and recommendations. Section 1 of the report presents the program profile and evaluation details such as the purpose, scope, evaluation questions, methodology and limitations. Section 2 of the report details the evaluation findings, inclusive of supporting evidence.

<sup>1</sup> During the study period, many responsibilities of Indigenous and Northern Affairs Canada (INAC) transitioned to a new department called Indigenous Services Canada (ISC). In order to remain consistent in this report, ISC will be used throughout.

### 1.2 Program Profile

#### 1.2.1 Program Description

SEP supports persons fleeing domestic violence by offering financial assistance through two components:<sup>2</sup>

- **SEP New Construction:** the acquisition or construction of shelters (emergency) and second stage (transitional) housing; and
- **SEP Renovation:** the repair, rehabilitation and improvement of existing shelters.

CMHC delivers SEP New Construction and Renovation through the provision of interest-free, fully-forgivable loans to project sponsors (mainly First Nations) of shelters and second stage housing for persons fleeing domestic violence. For shelters, operating funding is provided by ISC. For second stage housing, occupants are expected to make modest contributions (i.e., rent) to offset the project's operating costs, with the project owner being responsible for managing the project, including costs.

- **SEP New Construction:** CMHC funding covers 100% of capital costs and successful applicants must obtain an MLG from ISC (or other form of security acceptable to CMHC). In addition, successful applicants must also enter into an operating agreement with CMHC for 15 years, which is intended to ensure that the applicant complies with the terms of the loan. Funds are disbursed based on the degree of project completion. Applicants must obtain operating funding from ISC or other sources prior to a funding commitment by CMHC.
- **SEP Renovation:** Funds for renovations and major repairs are provided across five categories (structural soundness, electrical system, plumbing system, heating system, and fire safety) plus three additional categories (accessibility for persons with disabilities, children's play areas, and security). The maximum loan for renovations is \$60,000 per unit/bed-unit, except in remote areas, which are eligible for a 25% supplement. Those who have previously received SEP Renovation funding may re-apply for a second loan under the condition that it has been 15 years after the date the original SEP loan was approved. Projects that received SEP Renovation less than 15 years ago may receive reduced assistance if the maximum funding per unit/bed-unit has not been provided. While SEP provides funding for major repairs, ISC's FVPP provides funding for minor maintenance and repairs (not to exceed \$50,000 per project).

SEP is funded in a number of ways. CMHC has a suite of renovation programs on-reserve, with SEP being just one program among this suite.<sup>3</sup> The renovation programs are partially funded through CMHC's A-based funding and partially funded through historical allocations from the Investment in Affordable Housing program, which ends March 31, 2019. In addition, Budget 2016 provided three years of dedicated funding towards five new shelters under SEP until March 31, 2019, which included funding for ISC to operate these new shelters.

#### Delivery Process

As SEP forms part of a suite of other renovation programs (RRAP, HASI and ERP), SEP is allocated funding amongst this broader suite and there is no set annual budget, unless provided specifically by the Government (i.e., Budget 2016). The process required for First Nation clients to apply for funding and for CMHC regional offices to deliver program funding varies from region to region. This evaluation did not review the allocation or delivery process for SEP, with the exception of the SEP New application process that was developed in 2016.

<sup>2</sup> For a portion of time during the study period, SEP had both off-reserve and on-reserve components. In the off-reserve component, SEP was delivered by CMHC in some provinces/territories (P/Ts), and in other P/Ts SEP was delivered by the province or territory on a cost-shared basis. CMHC delivered SEP on-reserve across Canada. After 2011, the funding and delivery of the off-reserve component of SEP was transferred to the P/Ts. Some P/Ts kept a 'SEP-like' program, while others designed new programs. As a result, SEP Off-Reserve as it was known before did not exist after 2011.

<sup>3</sup> Residential Rehabilitation Assistance Program (RRAP); Home Adaptations for Seniors' Independence (HASI); and the Emergency Repair Program (ERP).

Since 2016, SEP New Construction has used a two-stage application process: an expression of interest (EOI) submission followed by a full application. The EOI must include:

- a demonstration of the need for shelter services through the provision of local statistics on family violence, child abuse and/or children in care, violent crime rates, size of population they would be serving, etc.
- a cost estimate, together with backup (e.g., site plans, building drawings);
- a Band Council resolution demonstrating support for the project;
- a commitment to establish a working group involving multiple stakeholders from the community from the start of the project (health and social services, law enforcement, school representative, contractor responsible for the construction etc.);
- eligibility of the FN to obtain a Ministerial Loan Guarantee (MLG) or other acceptable form of security.

The full application covers the same items, but in more detail (e.g., final working drawings and specifications, firm contract prices). Applications are assessed by a joint committee with representation by CMHC, ISC, and other organizations involved with persons fleeing domestic violence based on the above criteria together with the track record of the shelter (as applicable) and geography (distance from other existing shelters).

While CMHC's SEP provides funding to build new or repair existing shelters and second stage housing, CMHC does not provide any funding to operate the shelter. ISC's FVPP provides contributions to support culturally appropriate family violence shelter and prevention services for Indigenous women, children and families on reserve, including shelter operating funding. The FVPP complements SEP by funding shelter services (75% of the program budget) and prevention projects (25%). FVPP's shelter services funding is provided to support the operation, facility and administrative costs of shelters on-reserve, including staff salaries, training and direct client costs. Reimbursements from ISC are also provided to provincial/territorial shelters serving Indigenous clients normally resident on-reserve.

**Table 1: SEP expenditures between 2007-08 and 2016-17**

Fiscal Year	SEP New Construction	SEP Renovation	Grand Total
2007-2008	\$224,268.00	\$894,858.86	\$1,119,126.86
2008-2009	\$865,162.07	\$281,127.78	\$1,146,289.85
2009-2010	\$2,182,911.84	\$147,979.12	\$2,330,890.96
2010-2011	\$414,980.09	\$250,447.38	\$665,427.47
2011-2012	\$342,438.00	\$219,552.00	\$561,990.00
2012-2013	\$0	\$173,940.00	\$173,940.00
2013-2014	\$0	\$192,690.00	\$192,690.00
2014-2015	\$0	\$506,300.54	\$506,300.54
2015-2016	\$0	\$22,790.00	\$22,790.00
2016-2017	\$0	\$257,199.46	\$257,199.46
<b>Grand Total</b>	<b>\$4,029,760.00</b>	<b>\$2,946,885.14</b>	<b>\$6,976,645.14</b>

Total SEP expenditures over this period were \$6.98 million.

**Table 2: SEP units/bed-units between 2007-08 and 2016-17 by project commitment<sup>4</sup>**

Fiscal Year	SEP New Construction	SEP Renovation	Grand Total
2007-2008	5	260	265
2008-2009	16	24	40
2009-2010	10	26	36
2010-2011	0	47	47
2011-2012	8	35	43
2012-2013	0	43	43
2013-2014	0	26	26
2014-2015	0	51	51
2015-2016	0	9	9
2016-2017	0	0	0
<b>Grand Total</b>	<b>39</b>	<b>521</b>	<b>560</b>

During the study period, 560 units/bed-units were created or repaired.

## 1.2.2 Program Objectives

The objectives of the SEP components are:

- **SEP New Construction:** To provide financial assistance to increase the number of emergency shelters and second-stage housing on-reserve available to persons fleeing domestic violence.
- **SEP Renovation:** To provide financial assistance to existing shelters/second stage housing to undertake repairs in order to provide an acceptable level of health, safety, and security for occupants, as well as accessibility for persons with disabilities.

A simplified theory of change model is contained in Appendix B.

## 1.3 Evaluation Background

### 1.3.1 Evaluation Scope

CMHC's 2017 Treasury Board Submission for SEP states that an evaluation will examine the program's success, and in particular its impact on:

- Availability of shelters and second-stage housing
- Accessibility to shelters and second-stage housing
- Improved safety and shelter services for persons fleeing domestic violence, and
- Improved community response to the issue of domestic violence.

The Initial Design Plan states that the evaluation will also examine the continued need for the program and the economy and efficiency of its design and delivery.

<sup>4</sup> Note: Units/bed-units are identified against the project commitments identified by the year projects were completed as expenditure data is not reported on a unit/bed-unit basis.

The time period covered by the evaluation is fiscal years 2007/08 through 2016/17. It should be noted that in Budget 2016, the Government provided CMHC with \$10.4 million over three years for the construction of five new shelters in First Nation communities.<sup>5</sup> As these funds were not expended during the study period, they are primarily outside the scope of this evaluation. However, Evaluation Question 7 (reviewing the economic and efficient delivery of SEP) examined the delivery process used over the 2016/17 period as it was determined, in consultation with the Working Group, that a review of the new process would enable the provision of relevant findings to effectively inform future decision-making.

### 1.3.2 Evaluation Questions

The key evaluation questions (EQ) that were examined:

#### Relevance

1. Is there a continuing need for a program to fund the construction and renovation of shelters for persons fleeing domestic violence in Indigenous communities on-reserve?
2. How do the intended outcomes of SEP On-Reserve align with federal government and CMHC priorities?

#### Effectiveness

3. To what extent has SEP On-Reserve supported increased availability of and accessibility to shelters (emergency) for persons fleeing domestic violence?
4. To what extent has SEP On-Reserve facilitated increased availability of and accessibility to second stage (transitional) housing for persons fleeing domestic violence?
5. To what extent has SEP On-Reserve contributed to improved safety and shelter services for persons fleeing domestic violence?
6. To what extent has SEP On-Reserve contributed to improved community response to domestic violence?

#### Economy and Efficiency

7. Is SEP On-Reserve being delivered to clients in an economic and efficient manner?
8. Are there more economic and efficient ways to design SEP On-Reserve?

<sup>5</sup> The Government also provided ISC with \$33.6 million over five years and \$8.3 million in ongoing funding for the associated operation of these shelters.

### 1.3.3 Evaluation Methodology

The overall approach of the evaluation was a mixed-method approach that consisted of a review of literature and program data information, as well as key informant interviews.

#### External Documentation and Literature Review

This included a review of federal initiatives, including the Family Violence Initiative (FVI), FVPP and the Federal Strategy to Prevent and Address Gender-Based Violence, as well as Ministerial mandate letters, and other literature inclusive of research and publications.

#### Analysis of Internal Program Data and Documentation

This included an analysis of previous evaluations, Treasury Board Submissions, National Housing Strategy (NHS) consultation information, SEP program guidelines and other program materials, as well as SEP financial data.

#### Key Informant interviews

Over 60 key informant interviews (KIs) were conducted with different groups to provide a cross-section of perspectives. This included:

- 21 interviews with CMHC program staff including representatives from national and regional offices.
- 12 interviews with CMHC and ISC Head Office personnel including representatives from policy and programs groups.
- 29 interviews with shelter operators and community representatives. A selection criteria for interviewees was used to ensure there was a sufficient cross-section of shelters by geographic region (BC, Prairies and Territories, Ontario, Quebec, Atlantic); location type (urban, rural and remote); and, shelter type (shelters and second-stage housing) (see Appendix D for further details).

Urban	20%
Rural	60%
Remote	20%

Emergency	76%
Second Stage	24%

BC	20%
PTR	28%
ON	20%
QC	16%
ATL	16%

### 1.3.4 Evaluation Limitations

Evaluations face constraints that may have implications for the validity and reliability of evaluation findings. The following table outlines the limitations encountered during the conduct of the evaluation and the mitigation strategies that were put in place. This ensures that findings can be used with confidence to guide program planning and decision-making.

Limitation	Impact	Mitigation Strategy
Limited availability of reliable program data	It is possible that conclusions could be drawn based on inconsistent data	The evaluation was designed to use the data that was available and supplement it with qualitative data collected through KIs to triangulate reliability.
High dependence on interviews	Evaluation evidence could be opinion-based and thus subjective	The evaluation triangulated different lines of evidence to the degree possible. It was made clear when conclusions relied heavily on interview data.
Lack of institutional memory among KIs, as many were relatively new in their positions	Interviewees were not generally able to place their comments within the study period	The evaluation relied on program data and documentation to validate information provided by KIs.
Small sample size	Results may not be statistically significant	Statistical validity is not important in this case. We also selected a broader sample size taking a reasonable response rate into consideration.
Lower than expected response rates	It is possible that conclusions could be drawn that do not accurately reflect the broader population	Partially alleviated by posing the same questions to different categories of respondents, so that the number of responses to certain questions is reasonably high.

## 2 Evaluation Findings

### 2.1 Relevance

**EQ 1: Is there a continuing need for a program to fund the construction and renovation of shelters for persons fleeing domestic violence in Indigenous communities on-reserve?**

#### Findings

1. There is a high incidence of domestic violence in FN communities predominantly affecting women, but also affecting men and children/youth who may have different needs for shelters/safe spaces.
2. Awareness of domestic violence in FN communities has increased; however, not all those who experience domestic violence are able to receive all the help that they need from the services available within their FN community, especially those in remote and rural areas.
3. There is a critical need to increase the supply of shelters and second-stage housing.
4. There is an on-going need for funding for repairs and renovations for shelters.

#### Supporting Evidence

**Finding 1: There is a high incidence of domestic violence in FN communities predominantly affecting women, but also affecting men and children/youth who may have different needs for shelters/safe spaces.**

There is limited reliable data on the prevalence of domestic violence experienced by individuals living in FN communities. After conducting a literature review, the following information can be determined (which includes statistics on Indigenous peoples living off-reserve):

- The overall rate of violent victimization of Indigenous women is almost three times higher than that of non-Indigenous women (220 violent incidents per 1,000 people vs. 81 per 1,000);<sup>6</sup>
- When looking specifically at spousal violence, half of Indigenous victims report experiencing more severe forms of spousal violence (sexual assault, beatings, choking, threatened with weapon) compared to less than a quarter (23%) of non-Indigenous victims.<sup>7</sup> In addition, Indigenous women more often (52%) fear for their lives than non-Indigenous women (31%).<sup>8</sup>
- While the majority of all spousal violence is not reported to police, Indigenous individuals (50%) were almost twice as likely than non-Indigenous individuals (28%) to report spousal violence to police.<sup>9</sup> Indigenous people were also more likely than non-Indigenous to speak about the spousal violence with someone else compared to non-Indigenous individuals (92% versus 66%).<sup>10</sup>
- The incidence of spousal violence differs geographically. For instance, the 2014 General Social Survey (GSS) found the proportion of self-reported spousal violence against Indigenous women was almost twice as high in the territories (19%) than in the provinces (10%).<sup>11</sup>

<sup>6</sup> Statistics Canada. General Social Survey (GSS) on Victimization, 2014. This report is based on both on-reserve and off-reserve Indigenous peoples.

<sup>7</sup> Statistics Canada. GSS on Victimization, 2014.

<sup>8</sup> Canadian Centre for Justice Statistics. Maire Sinha, "Measuring violence against women: Statistical trends," Juristat.

<sup>9</sup> Statistics Canada. Jillian Boyce. *Victimization of Aboriginal people in Canada*, 2014. Published 2016.

<sup>10</sup> Statistics Canada. GSS on Victimization, 2014.

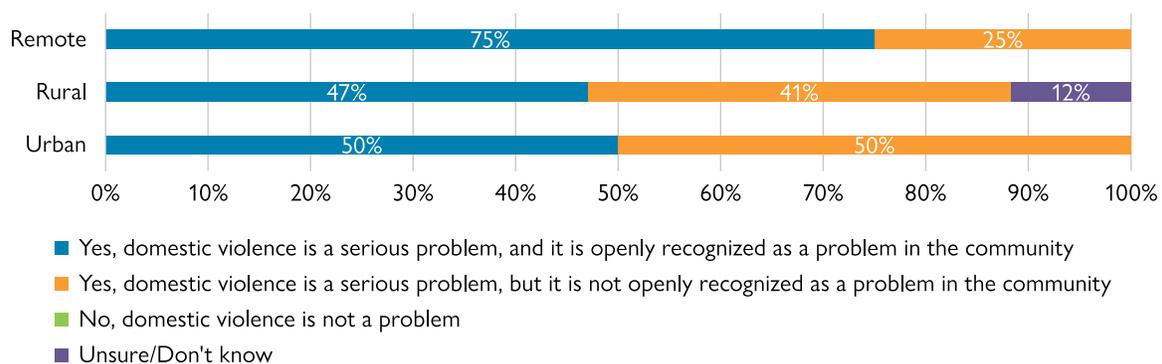
<sup>11</sup> Justice Canada. *Victimization of Indigenous Women and Girls* (July 2017).

- Domestic violence is not limited to intimate partner violence where the victims are women. Indigenous men (8%) are twice as likely to report being a victim of intimate partner violence compared to their non-Indigenous counterparts (4%) while Indigenous women (10%) are three times as likely (3%) when compared to non-Indigenous women. This also highlights that the incidence of domestic violence for Indigenous women is close to that of Indigenous men (10% to 8%, respectively).<sup>12</sup>
- Male victims are more likely (76%) to report injuries of cuts, scratches and bruises compared to female victims (33%).<sup>13</sup> Male victims are less likely (24%) to report spousal abuse to police and are less likely to leave violent situations. Men also face systemic barriers when seeking help and leaving a violent situation.<sup>14,15</sup>
- Children and youth also experience domestic violence. In 2016, the Public Health Officer reported that 30% of Canadians had experienced abuse before the age of 15.<sup>16</sup> Indigenous people are more likely (40%) to report experiencing some form of childhood physical and/or sexual maltreatment before the age of 15 compared to non-Indigenous people (29%).<sup>17</sup> In cases of physical maltreatment, 74% of Indigenous victims of domestic violence reported that a family member was the perpetrator.<sup>18</sup> A high majority (93%) of self-reported cases of child maltreatment never came to the attention of authorities, neither the police nor child protective services.<sup>19</sup>

**Finding 2: Awareness of domestic violence in First Nation communities has increased; however, not all those who experience domestic violence are able to receive all the help that they need from the services available within their First Nation community, especially those in remote and rural areas.**

In terms of the prevalence of violence, specifically in the First Nation communities surveyed for this evaluation, 93% of shelter operators and community representative respondents identified domestic violence as a serious problem in their community (see Table 3 for breakdown between urban, rural and remote).

**Table 3: Perception of the Prevalence of Domestic Violence in First Nation Communities Interviewed**



Shelter operators and community representative respondents were also asked what they perceived to be the current incidence of domestic violence in their community. Respondents from First Nations communities located in urban and rural areas said the average incidence is approximately 53%, compared to approximately 40% of respondents from

<sup>12</sup> Ibid.

<sup>13</sup> Statistics Canada. Marta Burczykca. *Trends in self-reported spousal violence in Canada, 2014*.

<sup>14</sup> Ibid.

<sup>15</sup> Harris, Dawn. C. "Counselling Male Victims of Domestic Violence: A Phenomenology Study." August 2016.

<sup>16</sup> Public Health Agency of Canada. The Chief Public Health Officer's Report on the State of Public Health in Canada 2016 *A Focus on Family Violence in Canada*.

<sup>17</sup> Statistics Canada. GSS on Victimization, 2014.

<sup>18</sup> Statistics Canada. Jillian Boyce. *Victimization of Aboriginal people in Canada, 2014*. Published 2016.

<sup>19</sup> Statistics Canada. Samuel Perrault. *Criminal Victimization in Canada, 2014*. Published 2015.

First Nation communities located in remote areas. In other words, it is these respondents' perception that about half of households in their community experience some sort of domestic violence. When asked to what extent they perceived the incidence of domestic violence had changed in their community over the last five years, 62% of shelter operators and community representative respondents said "about the same," while 21% perceived incidence of domestic violence had increased.

Domestic violence in Indigenous communities is the result of many correlating factors which are reported extensively throughout the literature.<sup>20, 21, 22, 23, 24, 25</sup> These factors include (not an exhaustive list):

- Lack of access to safe, stable and adequate housing (not overcrowded and in good condition);
- Alcohol or substance abuse;
- Lack of access to social health services, including mental health and addiction treatment services;
- Lack of economic opportunities (low-income, financial stress, lack of employment opportunities);
- Impacts of colonization, legacy of residential schools and intergenerational trauma;
- History of child abuse/neglect or poor parenting practices; and/or
- Lack of self-esteem, insecurity and/or experience with healthy, loving relationships.

Shelter operators and community representative respondents echoed these underlying risk factors.

Additionally, as part of the Interim Report from the National Inquiry into Missing and Murdered Indigenous Women (NIMMIWG) published in September 2017 that analysed almost 100 reports on violence against Indigenous women and girls in Canada, more than 1,200 recommendations to address the disproportionate rates of violence against Indigenous women in Canada were developed. Almost every report that discusses the root causes of violence points to the continuing impacts of colonization of Indigenous communities in Canada. As a result, Indigenous women and girls have experienced disproportionate rates of poverty and poor living conditions, are more vulnerable to violence and are less able to leave violent situations. Particularly, access to emergency housing in the short-term as well as safe, affordable housing in the long-term is consistently noted as a key gap.<sup>26</sup>

Poor self-esteem and mental health also have an impact on the rate of domestic violence. The issue of mental health in Indigenous communities was studied by the House of Commons Standing Committee on Indigenous and Northern Affairs in 2017 following several youth suicides in Indigenous communities. In the report, family violence was raised and when asked what was needed to decrease the rates of suicide, Inuit youth in Nunavik responded "fix my parents." The link between domestic violence and the stress associated with overcrowded housing was also mentioned by witnesses who appeared before the Committee. As a result, the Committee recommended that the Government of Canada should create more safe spaces for youth.<sup>27</sup> Shelters for youth are eligible under SEP, but in most cases, shelters are predominantly used by women fleeing violence.

In recent years, it appears that awareness of domestic violence within First Nation communities has increased. As shown in Table 4, shelter operators and community representative respondents overwhelmingly agreed (92%) that the community is more aware of domestic violence than they were in 2011, and two-thirds agreed that community agencies are working together to address the problem.

<sup>20</sup> World Health Organization. Preventing Intimate Partner and Sexual Violence – the Evidence, 2010.

<sup>21</sup> Evaluation of the FVPP, 2012.

<sup>22</sup> National Inquiry into Missing and Murdered Indigenous Women and Girls. Interim Report, 2017.

<sup>23</sup> Statistics Canada. Criminal Victimization in Canada, 2015.

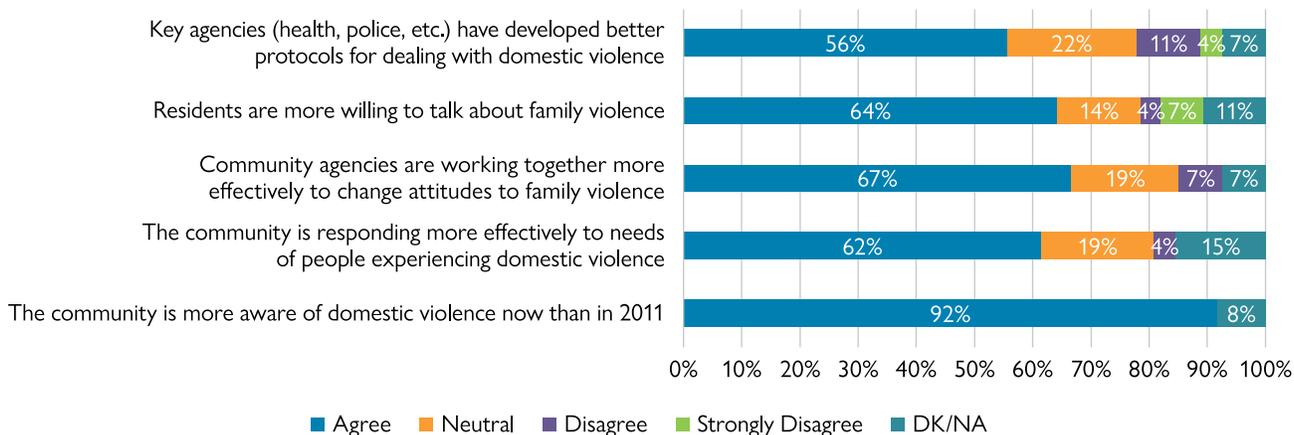
<sup>24</sup> Statistics Canada. GSS on Victimization, 2014.

<sup>25</sup> Public Health Agency of Canada. The Chief Public Health Officer's Report on the State of Public Health in Canada 2016: A Focus on Family Violence in Canada.

<sup>26</sup> National Inquiry into Missing and Murdered Indigenous Women and Girls. Interim Report, 2017, p. 38.

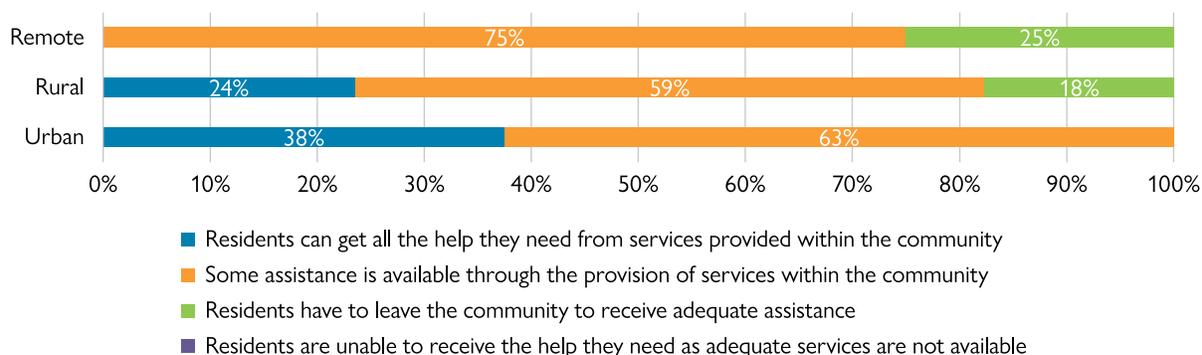
<sup>27</sup> House of Commons. Standing Committee on Indigenous and Northern Affairs in their 2017 report *Breaking Point: The Suicide Crisis in Indigenous Communities*.

**Table 4: Shelter Operator and Community Representative Respondents Responses to Awareness and Progress to Addressing Domestic Violence within their Community**



However, not all who experience domestic violence are able to receive all the help that they need from the services available within the First Nation communities. As illustrated in Table 5, shelter operator respondents reported that clients located closer to urban centres are more likely than clients in remote areas to access all the help they need from the services within the community.

**Table 5: The ability of the community to fully address client need by urban, rural and remote**



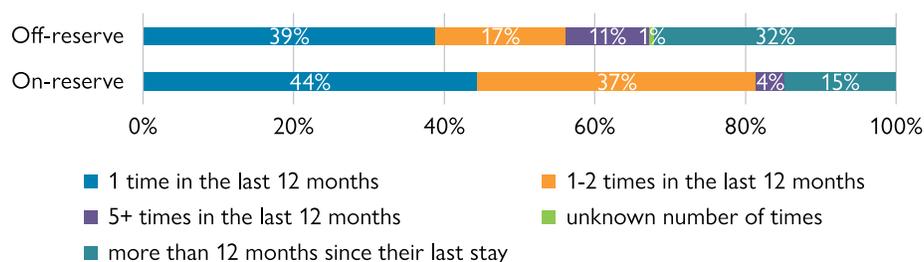
**Finding 3: There is a critical need to increase the supply of shelters and second-stage housing**

At the end of the study period, there were 41 shelters on reserve for 600 First Nation communities. When looking at the rate of use of existing shelters (including second stage housing), shelter operator respondents identified their facilities had been used, on average, to full capacity or above full capacity more than 25% of the time over the past five years. That said, it should not be concluded that because not all shelters are operating at full capacity that there is not a need to build more shelters. There are other barriers that could prevent victims from fleeing domestic violence, for example, inability or willingness to leave; fear of reprisal; lack of awareness of available supports; shelter doesn't meet family needs (i.e., teenaged son, childcare); unable to access shelter due to lack of transportation; or, preference to stay with a friend or relative.<sup>28</sup>

<sup>28</sup> Canada. Public Health Agency of Canada. Aboriginal Women and Family Violence, 2012.

Not everyone who uses a shelter is there for the first time. According to the Transition Home Survey (THS), which includes a one-day (as of April 15, 2014) snapshot of shelters and second stage housing for persons fleeing violence; when examining the total number of women and children residents within the facility for reasons of abuse, 33% of those on-reserve had been to the shelter before, versus 14% of those off-reserve. Further, of those on-reserve that had been to the shelter before, 39% had been there one time already in the past 12 months, while 17% had been there 1-2 times in the past 2 months, meaning slightly more than half of those who had been a resident before had been to the facility 1-2 times within the past 12 months.

**Table 6: Transition Home Survey: Repeat Users of Shelter**

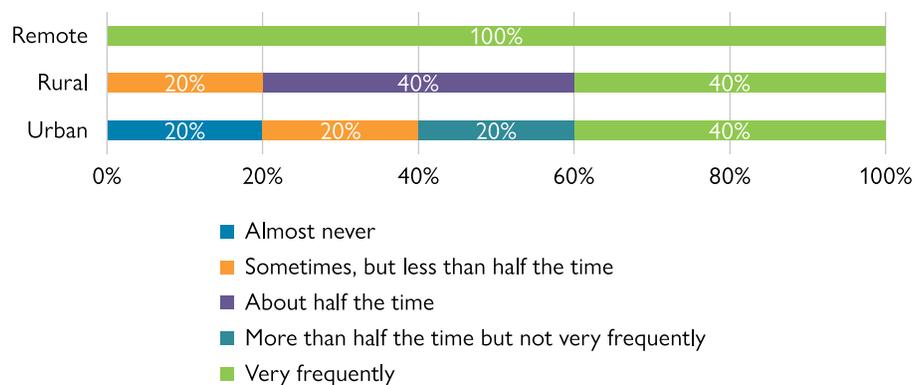


The need to increase the supply of shelters is almost unanimous among evaluation respondents. For CMHC and ISC respondents, 85% said that shelters are currently needed “to a great extent” while 92% of community representative respondents echoed this sentiment, identifying that they perceived the presence of a shelter in their community as being “critically important.”

Many respondents also specified that there is a lack of second-stage housing. The majority of shelter operators and community representative respondents identified that the greatest need in their community was for second stage housing for women. It should be noted that this perception came from communities that already have a shelter. More specifically, 83% of community representatives identified that it was critically important to have a second stage housing in their community while 83% of CMHC and ISC respondents identified the need for second stage housing “to a great extent.”

Further, a lack of second stage housing can lead to backlogs in shelters which can prevent those who have fled violent situations to move forward and find more permanent housing. Shelter operators were asked how frequently they extended the stay of a client because no alternative or long-term accommodation was available in the community. In terms of frequency, 40% of both urban and rural respondents identified that this occurred “very frequently”, while all remote respondents identified that this occurred “very frequently” as illustrated by Table 7.

**Table 7: Shelter Operator Responses to Extending Shelter Stay Due to Lack of Long-Term Housing Options**



**Finding 4: There is an on-going need for funding for repairs and renovations for shelters**

To assess the level of need for repairs or renovations, the best available and recent data on shelter conditions on-reserve is from the Asset Condition Reporting System (ACRS) reports, which were carried out by ISC as a one-time occurrence in 2016. There were 20 reports that were provided to CMHC, which were from the following geographic regions:

- Atlantic – 2
- Ontario – 5
- Quebec – 1
- Alberta – 6
- BC – 6

Overall ACRS report averages are shown in the following table. It should be kept in mind that the inspection data provided is dominated by reports from BC, Alberta, and Ontario (85% of the total reports) and may not be representative of all regions. From the data, shelters in Ontario appear to be in much better condition. However, it is possible that the criteria used for inspection reports were different (i.e., interpretation of what ‘good’ condition is).

**Table 8: Average Shelter Conditions by Region**

Region	Average condition rating	Average Operations & Maintenance (O&M) rating	Average costs of needed repairs (\$)
BC	7.3	2.6	121,400
Alberta	6.9	1.9	161,800
Ontario	8.0	2.2	10,800
Others	8.5	2.0	127,000
<b>All combined</b>	<b>7.5</b>	<b>2.2</b>	<b>107,800</b>

Source: 2016 ACRS reports

General condition rating: 1-3 = poor; 4-6 = fair; 7-9 = good; 10 = new

O&M effort rating: 0 = non-operational; 1 = poor; 2 = fair; 3 = good

Based on this information, it could be concluded that this sample of shelters was, on average, in good condition which aligns with interview data. According to shelter operator respondents, 65% rated the condition of their shelter in satisfactory condition or better, while only 38% rated their facility in this condition in 2011.

The majority of shelter operator respondents (81%) reported that they plan to undertake repairs or make improvements to their shelter facilities within the next five years. These results can be correlated to findings from the THS (note: the sample size was larger for the THS). In 2014, about a quarter (27%) of shelter respondents on-reserve anticipated needing major repairs or improvements over the next five years, while 42% anticipated needing minor repairs or improvements over the same time period. As well, almost one-third (31%) of respondents anticipated that structural improvements would be required over the next five years.

In terms of estimated costs to undertake such repairs or improvements, shelter operator respondents estimated that repairs or replacements to the basic physical structure could range from as low as \$25,000 to \$350,000 with an average repair estimated to cost of \$83,143 per shelter. They estimated that adding new units to their facility could range anywhere from \$50,000 to \$400,000 with an average estimated cost of \$175,000 per shelter. In terms of adding a second stage housing facility to their operations, shelter operator respondents estimated that this could range anywhere from \$1M to \$1.5M, with an average estimated to cost of \$1.25M per shelter.

### EQ 2: How do the intended outcomes of SEP On-Reserve align with federal government and CMHC priorities?

#### Findings

1. The federal government places a high priority on addressing domestic violence; however, beyond March 31, 2019 there is no dedicated funding to build new or repair existing shelters and transitional housing for persons fleeing violence in First Nation communities.
2. The intended outcomes of SEP On-Reserve are aligned with CMHC priorities. That said, it is not clear, at the time of writing this evaluation, how shelters and second stage housing for persons fleeing violence in First Nation communities will be supported under the National Housing Strategy and the First Nations Housing and Infrastructure Strategy.

#### Supporting evidence

As identified in section 1.2 (Program Description), the intended outcomes of SEP are:

- Increased availability of shelters and second stage housing for persons fleeing domestic violence;
- Improved safety and access to shelter services for persons fleeing domestic violence; and,
- Supporting the community response to the issue of domestic violence.

It should be noted that the program contributes towards the achievement of each of these outcomes, and is not the sole party responsible for outcome achievement.

**Finding 1: The federal government places a high priority on addressing domestic violence; however, beyond March 31, 2019 there is no dedicated funding to build new or repair existing shelters and transitional housing for persons fleeing violence in First Nation communities.**

Since the new federal government came to power in the fall of 2015, domestic violence has become a federal priority. This is evident by the number of Ministers (including Justice, Status of Women Canada, ISC, and Infrastructure Canada) who have the issue mentioned in their respective mandate letters.<sup>29</sup> In most cases, the mandate commitment is worded as “ensuring that no one fleeing domestic violence is left without a place to turn by continuing to grow and maintain Canada’s network of shelters and second stage houses.”

The Minister responsible for CMHC does not mention domestic violence nor shelters in his mandate letter; however, federal investments have been provided to CMHC to support shelters and second stage housing for survivors of violence, including those in First Nation communities (further specifics provided under Finding 2).

There are three overarching federal initiatives that examine or provide support for persons fleeing domestic violence:

#### a) The Family Violence Initiative (FVI)

Launched in 1988, the FVI has been the federal government’s primary horizontal mechanism for addressing domestic violence. Led and coordinated by the Public Health Agency of Canada, 15 federal partners work together to promote public awareness; strengthen the ability of health, social, criminal justice and housing systems to respond to domestic violence; and, to promote data and research efforts to identify effective interventions.

Over the years, annual funding levels for FVI has varied in response to government objectives. In 1998, the annual funding was \$40 million and rose to \$136 million in 1991 but was reduced to \$7 million in 1997 where it has remained for over two decades. Only seven (including CMHC) of the 15 federal partners receive funding directly from FVI, while the unfunded departments support family violence through their departmental internal activities and budgets. CMHC receives the highest level of funding from FVI with \$1.9 million annually; however, on-reserve shelters do not

<sup>29</sup> Mandate letters as of August 2018.

receive this funding as it is currently being provided to provinces and territories to support off-reserve accommodations for survivors of violence through a broader suite of supports (i.e., construction of new, renovation of existing, rent supplements and shelter allowances).

CMHC keeps other federal departments apprised on its family violence activities—including SEP—through the FVI interdepartmental working groups. In 2017, a horizontal evaluation of the FVI was conducted by the Public Health Agency of Canada and found that the FVI is currently not demonstrating a deeper level of horizontality due to stagnant and limited funding, limited engagement at the senior level, differing results between departments (e.g., FVI is only one source of funding for family violence; performance measurement and reporting are primarily conducted at the departmental level rather than joint outcomes or targets), and that the federal government is one player among many in response to family violence.<sup>30</sup> At the time of writing, the lead for the coordination of the FVI including its associated working groups was in the process of being transferred to Status of Women Canada.

### b) The Federal Strategy to Prevent and Address Gender-Based Violence

Announced in June 2017, the Strategy to Prevent and Address Gender-Based Violence is the Government of Canada's current response to gender-based violence (referred hereafter to GBV Strategy), which is defined as violence perpetrated against someone based on their gender identify, gender expression or perceived gender. As defined in the strategy, violence against women and girls is one form of GBV while there is also a disproportionate impact on the LGBTQ2 community and gender non-conforming people. It should be noted that GBV does not include all forms of domestic violence (e.g., non-LGBTQ2 male victims of intimate partner violence, or male victims of violence against children/youth), and thus, there could be both duplication and gaps between the FVI and the GBV Strategy.

Led by Status of Women Canada, the GBV Strategy has three pillars: prevention; support for survivors and their families (includes shelters and second stage housing); and, promotion of responsive legal and justice systems. The GBV Strategy also states that it will fill gaps for diverse populations, including Indigenous Peoples and those living in northern, rural and remote communities.

Similar to FVI, there are 'funded' and 'unfunded' federal partners. Budget 2017 provided \$100.9 million over five years and \$20.7 million in on-going funding to six federal departments. In addition, Budget 2018 provided an additional \$86 million over five years and \$20.0 million in on-going funding. Neither CMHC, nor ISC receive funding from the GBV Strategy to support shelters/second-stage housing in First Nation communities and as an 'unfunded' partner CMHC is expected to support the Strategy through its own funding sources and activities (i.e., National Housing Strategy). From a review of publicly available information, there does not appear to be any outcomes, indicators or governance structures under the GBV strategy that would compel 'unfunded' federal partners to have accountability towards joint outcomes/ indicators at this time.

Women's Shelters Canada has been critical that the GBV Strategy is limited to areas of *federal* responsibility (rather than a national action plan) and this organization has stated that Canada has a "fragmented" approach to address domestic violence. Consequently, they argue, the GBV strategy does not ensure that women in all areas of Canada have access to comparable levels of services and protection, including access to shelters and second stage housing.<sup>31</sup> Similarly, the Government of Canada's predecessor strategy, the 2014 *The Action Plan to Address Family Violence*, was criticized by others as "window dressing" as it did not contain any new or specific initiatives, including those that could support Indigenous women.<sup>32</sup>

<sup>30</sup> Public Health Agency of Canada. *Evaluation of the Horizontal Coordination Function of the Family Violence Initiative 2011/12-2016/17*.

<sup>31</sup> Women's Shelters Canada. *Building a National Narrative: A Select Review of Domestic Violence Policies, Legislation and Services Across Canada*. September 2018.

<sup>32</sup> NIMMIWG. Interim report. p. 3.

### c) National Inquiry into Missing and Murdered Indigenous Women and Girls (NIMMWG)

Launched in August of 2016, the mandate of the NIMMIWG is to examine and report on the systematic causes of all forms of violence against Indigenous women and girls in Canada and look at patterns and underlying factors. The mandate also directs the Inquiry to report on existing institutional policies and practices to address violence, including those that are effective in reducing violence and increasing safety. The National Inquiry will conclude its research by December 31, 2018 and submit its final report by April 30, 2019.

The preliminary conclusions of the Inquiry's Interim Report state that progress to date has primarily been towards increasing awareness of and prioritizing efforts to address violence against Indigenous women and girls; however, the NIMMIWG state that while these declarations are an important first step, they will be proven to be "disingenuous" if they are not accompanied by meaningful action.<sup>33</sup>

**Finding 2: The intended outcomes of SEP On-Reserve are aligned with CMHC priorities. That said, it is not clear, at the time of the writing of this evaluation, how shelters and second stage housing for persons fleeing violence in First Nation communities will be supported under the National Housing Strategy and the First Nations Housing and Infrastructure Strategy.**

CMHC's mandate is to help Canadians meet their housing needs and CMHC has a strategic priority to reduce housing need.<sup>34</sup> CMHC's 2017 Annual Report identifies a short-term outcome that Canadians have improved access to affordable housing through existing programs and implementation of Budget 2016. Budget 2016 provided \$10.4 million over three years (until March 31, 2019) in dedicated funding to CMHC for the construction of five new shelters serving persons fleeing domestic violence in First Nation communities. The Budget also provided \$33.6 million to ISC over five years, beginning in 2016–17, and up to \$8.3 million ongoing funding to support the operation of these shelters.

In advance of the National Housing Strategy being announced, CMHC supported a symposium for a Pan-Canadian Voice for Women's Housing in September 2017. This group discussed the systemic barriers to safe, inclusive affordable housing, including women fleeing violence. At the end of the symposium, CMHC's President, Evan Siddall, committed to include and support shelters and survivors of domestic violence in the NHS and also committed to work with ISC on the distinctions-based Indigenous housing strategies.<sup>35</sup> The group also met in October 2018, and called on CMHC to reinstate the Shelter Enhancement Program and to ensure that shelter and other kinds of housing for women were equal to 25% of the total NHS funding envelope.

CMHC's current priority is the National Housing Strategy, which is a \$40 billion plan over 10 years to ensure that Canadians have access to housing that meets their needs and that they can afford. The NHS identifies several groups that will be targeted under the NHS, including survivors fleeing violence, Indigenous peoples and northern and remote residents. As well, at least 33% of NHS investments will support projects that specifically target the unique needs of women and girls.<sup>36</sup>

The NHS has several shared outcomes, including "The housing needs of Indigenous groups are identified and improved" however, references to Indigenous programming under the NHS document point to distinctions-based housing strategies that are being co-developed between the Government of Canada and Indigenous groups. Consultations on the development and implementation of distinct housing strategies for Métis, Inuit and First Nations continue to be underway. As of writing, only the *Métis National Housing Accord* has been announced (July 2018) and while public documents speak to creating new and repairing existing affordable housing options, support for shelters and

<sup>33</sup> NIMMIWG Interim Report. p. 55.

<sup>34</sup> CMHC. *Summary of the Amended Corporate Plan 2018-2022*, March 29, 2018, p. 18.

<sup>35</sup> Pan Canadian Voice for Women's Housing, 2017 report.

<sup>36</sup> CMHC. *Summary of the Amended Corporate Plan 2018-2022*, p. 8.

second stage housing is not specifically mentioned in the Métis strategy. SEP currently is only available in First Nation communities and it is unclear whether funding for shelters and second stage housing will be specifically included in the *First Nations Housing and Infrastructure Strategy*.

Following a review of the new NHS programs, it appears that shelters and second stage housing for persons fleeing domestic violence on-reserve could be supported under some of the programs. This, could include the National Housing Co-Investment Fund (NHCF) and potentially shelters and second stage housing off-reserve under the \$1.1 billion provincial/territorial (P/T) distinct housing needs program; however, there is no dedicated funding for the creation of new shelters or second-stage housing in First Nation communities beyond the Budget 2016 investment, which ends March 31, 2019. It is not expected that P/Ts will fund the construction of new or renovation of existing shelters/second stage housing in First Nation communities, and thus, it appears that the NHCF is the only NHS program that could potentially create new or renovate existing shelters/second stage housing for persons fleeing domestic violence in First Nation communities.

With respect to targets, the NHS document states that there are “ambitious” targets and under the National Housing Co-investment Fund at least 7,000 shelter spaces will be created or repaired,<sup>37</sup> although there is no specific target for shelters spaces/second stage housing units in First Nation communities.

The NHCF has minimum requirements for partnerships, financial viability, affordability, energy efficiency and accessibility, which could be a challenge for First Nation applicants to meet. The Canadian Housing and Renewal Association (CHRA)’s Indigenous caucus put forth a proposal that there be a carve out from NHS programs for Indigenous housing solutions based on proportional share of need.<sup>38</sup> As the NHCF was recently launched in 2018/19, at this time it is unclear the extent to which shelters and First Nations communities will be successful applicants.

As part of the interviews for this evaluation, CMHC personnel were asked to what extent the intended outcomes of SEP aligned with CMHC priorities. As illustrated by the following table, CMHC respondents see that SEP’s intended outcomes are aligned to CMHC’s priorities. That said, interview respondents observed that CMHC’s mission includes meeting the housing needs, particularly of vulnerable populations; however, some noted that there is insufficient funding and only one respondent stated that SEP is ‘very well aligned’ to the NHS.

**Table 9: CMHC personnel asked to what extent SEP intended outcomes align with CMHC priorities**

SEP Intended Outcomes	% who answered aligned “to a great extent”
Increased emergency housing options available to victims	77
Increased second-stage housing options available to victims	77
Improved safety and support for victims	69

Overall, SEP is aligned with federal and CMHC priorities; however, without dedicated funding or targets for shelters/second stage housing in FN communities, it is not clear, at the time of the writing of this evaluation, the extent to which we will see increased shelters/second stage housing options in First Nation communities under the *First Nation Housing and Infrastructure Strategy* or under the NHS.

<sup>37</sup> The NHS document states that 3,000 of the 7,000 targeted units will come from Budget 2016 investments. Budget 2016 provided \$89.9 million over two years to support over 3,000 shelter spaces off-reserve. The actual number of shelter spaces that were assisted with this funding is 5,800. Therefore, there are only 1,200 shelter spaces remaining in order to meet the target over the next ten years.

<sup>38</sup> Canadian Housing and Renewal Association. *A For Indigenous by Indigenous National Housing Strategy*. May 2018, p. 21.

### 2.2 Effectiveness

#### EQ 3: To what extent has SEP On-Reserve supported increased availability of and accessibility to shelters?

##### Findings

1. SEP New Construction provided funding to eight First Nation communities, resulting in a total of 39 units/bed-units, with total expenditures of \$4,029,760 between the fiscal years 2007/08 and 2011/12. The average expense per unit/bed-unit was \$103,326.
2. CMHC funding under SEP New Construction has had a 7% increase in the availability of units/bed-units over the study period.
3. SEP Renovation provided funding to 31 First Nation communities, committing to a total of 521 units/bed-units, with total expenditures of \$2,946,885 over the study period. The average expense per unit/bed unit was \$5,656.
4. Through SEP Renovation, it is estimated that CMHC funding reached approximately 91% of the overall stock of units/bed-units for on-reserve shelters and second stage housing over the study period.
5. SEP New Construction is estimated to have only provided a minor impact to geographic accessibility over the study period, contributing to a maximum potential decrease in the average travel distance by no more than 5%.
6. About half of shelter operator respondents perceived that their shelter was “successful” or “very successful” in providing accessibility to persons with disabilities, though half perceived SEP contributed to no extent, the majority of whom were recipients of SEP Renovation.

##### Supporting evidence

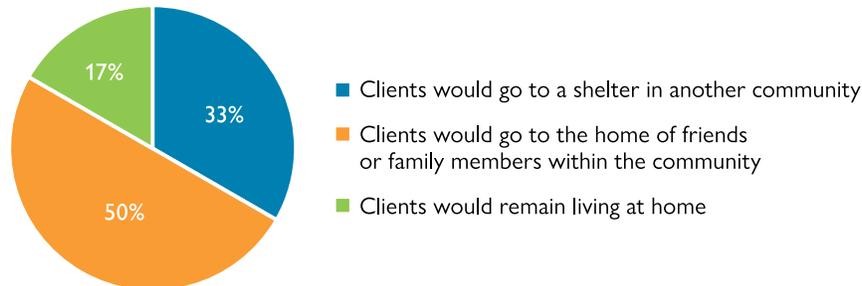
###### *Impact on availability*

The SEP New Construction guidelines include an objective to provide financial assistance to increase the number of shelters and second stage housing units on-reserve. The guidelines further encourage applicants to “develop projects at the least possible cost in order to maximize the number of units and shelter space that can be developed under this program.” Therefore, an assessment on the extent to which SEP has increased availability of shelters requires an assessment of the impact of SEP on the availability of units/bed-units within the shelters.

To assess overall availability of shelters, shelter operators were asked to identify the capacity of the shelter over the past five years. On average, shelter operators identified their shelters as being used to full capacity 20% of the time. They were further asked to identify how often over the past five years there had been more people wanting to use the shelter facility than they could accommodate, with 64% noting that this occurred “almost never” and 18% noting that it occurred “sometimes, but less than half the time.”

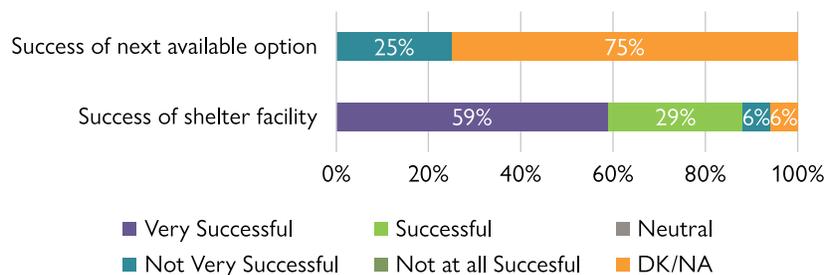
Community representatives from these communities were then asked to identify, in the absence of an available shelter, what they perceived as next available option that would be most commonly used by persons fleeing domestic violence within their community. As demonstrated in the table below, 50% of community representative respondents believed persons fleeing domestic violence would go to the home of friends or family members within the community, while 33% believed they would go to a shelter in another community, and 17% believed they would remain at home.

**Table 10: Community Respondents Identify Next Available Option for Persons Fleeing Domestic Violence if Shelter was Unavailable**



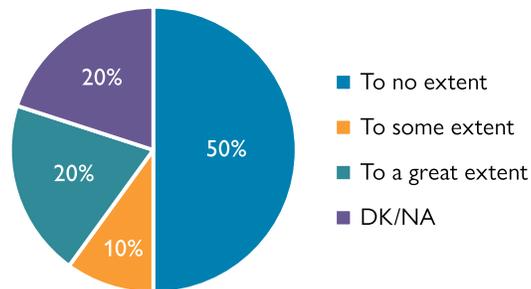
To assess the level of impact the shelter had in providing available spaces to persons fleeing domestic violence, shelter operators and community representatives were both asked to assess the extent to which they perceived the shelter was successful in providing spaces to persons fleeing domestic violence at the time it is needed and the extent to which they perceived the next available option would be successful. It should be noted that this assessment was solely conducted for communities which had received SEP funding and as such, communities without a shelter may have different responses. As shown in the table below, 88% of respondents perceived the shelter as being either “successful” or “very successful” in providing space to clients at the time it is needed. By contrast, 25% of respondents perceived the next available option to be “not very successful,” while the remainder responded that they either were not certain of the level of impact or chose not to respond. Therefore, the perception is that the shelters are more effective than the next available option in providing available spaces to persons fleeing domestic violence at the time it is needed.

**Table 11: Level of success in providing available spaces to persons fleeing domestic violence at the time it is needed**



Shelter operators were further asked about their perception in terms of the level of impact they believed CMHC funding had on the availability of their shelter. Of respondents, only 20% identified that SEP contributed to their ability to serve clients “to a great extent.” Conversely, 50% of shelter operators did not perceive that CMHC funding had resulted in any impact on the availability of the shelter. However, it should be noted that of these respondents, half identified that they were not at the shelter when SEP funding had been received while the other half identified that the funding had been provided too long ago to have a current impact. While 10% of shelter operators identified that CMHC funding had helped to some extent, they noted that the funding was not sufficient to fully complete the work required.

**Table 12: Extent to which CMHC funding has resulted in the capacity to serve more clients**



To further assess the impact of SEP on the availability of units/bed-units, we turn to SEP administrative data. Note that as administrative data is not identifiable by shelter type, the following analysis covers both shelters and second stage housing.

Over the study period, SEP New Construction provided funding to eight First Nation communities and commitments towards 39 units/bed-units, with total expenditures of \$4,029,760 over the study period. Given average commitments of 5 units/bed-units per First Nation community, the average expense per unit/bed-unit was \$103,326.

In order to assess the level of impact of SEP New Construction on the availability of units/bed units, we use the number of units/bed-units that were committed over the study period and compare that against THS data for an estimate of the total number of units/bed-units for on-reserve shelters and second stage housing.<sup>39</sup> From this data, we can estimate that the 39 new units/bed-units committed under SEP New Construction represent approximately 7% of the total number of units/bed-units that exist for on-reserve shelters and second stage housing. Therefore, we can estimate that CMHC funding under SEP New Construction had a 7% increase on the availability of units/bed-units over the study period.

Over the study period, SEP Renovation provided funding to 31 First Nation communities, or approximately 76% of shelters on-reserve. Over the study period, a total of \$2,946,885 was committed under SEP Renovation towards 521 units/bed units. Given average commitments under SEP Renovation of 17 units/bed units per First Nation community, the average expense per unit/bed-unit was \$5,656.

In order to assess the level of impact that SEP Renovation had on the availability of units/bed units, we use the number of units/bed units that were committed under SEP Renovation over the study period (521 units/bed-units) against THS data for an estimate of the total number of units/bed-units for on-reserve shelters and second stage housing.<sup>40</sup> From this data, we can estimate that the 521 units/bed units that were committed under SEP Renovation represented approximately 91% of the total number of units/bed-units for on-reserve shelters and second stage housing. Therefore, we can estimate that SEP Renovation has contributed to supporting, in some way, the availability of 91% of units/bed-units.

<sup>39</sup> Note that the total number of units/bed units was estimated using the average number of units per on-reserve facility against the total number of facilities on-reserve.

<sup>40</sup> Note that the total number of units/bed units was estimated using the minimum, average, and maximum number of units per on-reserve facility against the total number of facilities on-reserve.

### **Impact on accessibility**

Accessibility can be defined in two ways:

- Geographic accessibility, and
- Physical accessibility

This section assesses the level of impact that SEP had on both forms of accessibility over the study period.

### **Geographic accessibility**

Though there is no definition for geographic accessibility within the guidelines for SEP New Construction nor SEP Renovation, the guidelines do infer what the program supports with regard to geographic accessibility. The SEP New Construction guidelines identify that “shelters should be located in areas that are reasonably accessible to the on-reserve client population,” and they note that this includes “geographic.” Therefore an assessment of SEP’s impact on geographic accessibility is needed to determine whether shelters supported by SEP are reasonably accessible to the client population.

The 2012 FVPP evaluation concludes that the “majority of on-reserve residents have access to shelters;” however, this is based on the FVPP definition that a shelter is “accessible” to a FN with road access to the shelter if it is within 150 km or less from the FN by straight line distance.<sup>41</sup>

The results of the proximity analysis from the 2012 FVPP evaluation can be used as one method to estimate the impact that the eight shelters constructed during the study period had on geographic accessibility of the shelters.<sup>42</sup> If we assume that, per the guidelines, “no shelter shall be established in a location where there exists or will exist a shelter intended for the same purpose” then we can infer that these eight shelters were most likely established in areas where there was unmet need. Therefore, we will assume that these eight shelters were within communities that exceeded the initial average distance from a shelter per FVPP 2012 of 144km. The results are as follows:

Average travel distance to the nearest shelter prior to the 8 shelters constructed during the study period	144 km
Average travel distance to the nearest shelter following the 8 shelters constructed during the study period	140 km
Average travel distance to the nearest shelter following the 5 shelters constructed from Budget 2016 funding (2016-2018)	138 km

As demonstrated above, the eight shelters funded through SEP New Construction over the study period could have resulted in as much as a 3% decrease in the average travel distance. Though outside the scope of this evaluation, but for illustrative purposes, the five new shelters committed in Budget 2016 can be estimated to result in only a 2% decrease in the average travel distance. Therefore, we can see that there is only a minor impact on proximity of First Nation communities to a shelter.

Another aspect of geographic accessibility is transportation, and the facilitation of direct access to the shelter for communities where a shelter is present. The 2012 FVPP Evaluation Report identified that only 24% of on-reserve residents had shelter access within 50km.<sup>43</sup> The 2009 SEP evaluation reached similar conclusions, noting that only 20% of reserve residents lived with “direct access” to a shelter.

<sup>41</sup> Note that there were 90 FNs that had no shelter and no road access to shelters per FVPP 2012.

<sup>42</sup> 2012 FVPP evaluation, page 26.

<sup>43</sup> 2012 FVPP evaluation, page 25.

Shelter operators were asked whether their shelter facility is easy for potential clients to get to.

- 50% said yes, identifying that their shelters assist in the provision of transportation by either arranging transportation through the shelter or paying for private transportation.
- 33% said no, identifying that transportation can be an issue, which was a common theme regardless of whether the community was identified as urban or remote.
- 17% identified that they were uncertain, though recognized that it can be difficult for clients without access to their own transportation.

Shelter operators were further asked to what extent they perceived CMHC funding contributed to the availability of services that are easy to get to, with 50% identifying that they perceived CMHC funding as contributing to no extent. It should be noted, however, that 82% of respondents were recipients of SEP Renovation, which cannot impact the geographic location of the shelter, while 24% were recipients of SEP New Construction funding.

### ***Physical accessibility***

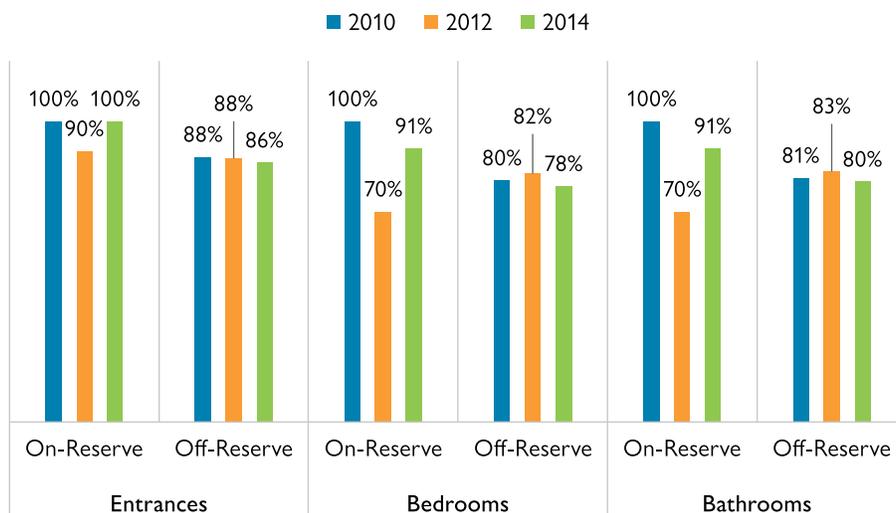
As with geographic accessibility, the SEP guidelines provide no specific definition for physical accessibility, however, they can still assist in identifying how the program supports accessibility. SEP New Construction guidelines confirm that in the selection process special consideration will be provided to projects that can accommodate occupants with disabilities, noting that eligible capital costs may include accessibility features for persons with disabilities. The SEP Renovation guidelines indicate in the program objective that SEP is intended to providing funding for the rehabilitation of shelters to an acceptable level of health and safety and to increase accessibility for persons with disabilities. Eligible properties under SEP Renovation must be substandard or deficient and require major repair or be lacking in basic facilities, including accessibility for persons with disabilities. Eligible accessibility modifications include, but are not limited to;

- Ramps
- Handrails, chair lifts and bath lifts
- Height adjustments to countertops
- Cues for doorbells, fire alarms and smoke detectors

Such modifications are required, per the SEP Renovation guidelines, to be brought up to meet or exceed the National Building Code of Canada (NBCC) and CMHC's Rental/Rooming House RRAP Standards for Rehabilitation, as well as the RRAP for Persons with Disabilities 'Eligible Modifications' description.

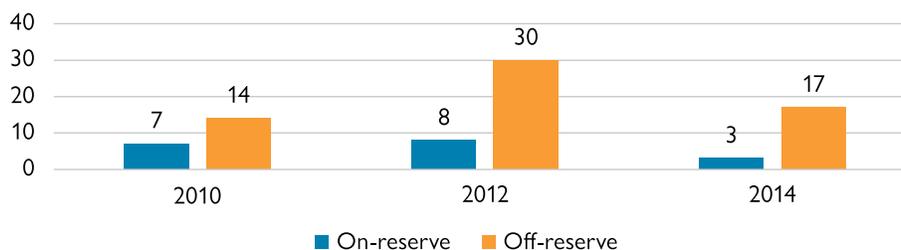
Looking first at the degree of physical accessibility features that are available within on-reserve shelters, we can see from the Transition Home Survey data in Table 13 that the percentage of on-reserve shelters with physical accessibility features exceed the percentage of off-reserve shelters with accessibility features. In fact, in regards to having at least one entrance, bedroom, or bathroom with accessibility features for those with disabilities, more than 90% of on-reserve shelters reported having each of these features in 2014, as opposed to less than 86% of off-reserve shelters.

**Table 13: Transition Home Survey Data on Emergency Shelters with Accessibility Features**



Further, on review of the number of residents taken as a snapshot of a day (the Transition Home Survey is a point in time survey taken every 2 years) over three separate years, there is a visible decline in the number of shelter clients on-reserve with disabilities (see table 14). One possible explanation of this could be inferred from a statement from one shelter operator, who noted a decline in number of clients with disabilities, but an increasing population of seniors experiencing domestic violence.

**Table 14: Transition Home Survey Data on Emergency Shelter Clients with Disabilities**

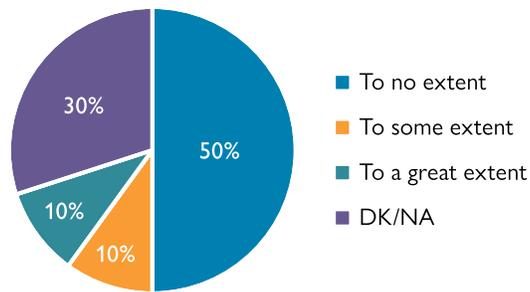


Therefore, from the data available through the Transition Home Survey we can confirm that the majority of on-reserve shelters have some level of accessibility features available within their facility. The THS data also suggests that there could be a potential decline in the demand for these features.

That said, only 56% of shelter operators perceived that their shelter was “successful” or “very successful” in providing access to persons with disabilities. 17% of respondents perceived that their shelter was not currently successful at providing access to persons with disabilities (with 66% of these respondents having received funding through SEP Renovation and 33% through SEP New Construction). Further, when asked to identify the extent to which shelter operators perceived CMHC funding had contributed to the ability of the shelter to meet the needs of clients and children with physical disabilities 50% of respondents perceived that CMHC contributed to no extent, the majority of whom were recipients of SEP Renovation. It should be noted that data on the list of repairs and renovations that were undertaken with SEP funding by First Nations was not available for this evaluation and thus an analysis of responses

against work undertaken could not be conducted. Therefore, if funding was provided to fix a roof, for instance, and not to undertake accessibility modifications, then it is understandable why no attribution of SEP to accessibility would be observed.

**Table 15: Extent to which CMHC funding has contributed to the ability to meet the needs of clients and children with physical disabilities**



### **EQ 4: To what extent has SEP On-Reserve facilitated increased availability of and accessibility to second stage (transitional) housing for persons fleeing domestic violence?**

#### **Findings**

1. 60% of second stage housing operators did not perceive that CMHC funding had resulted in any impact on the availability of the shelter, with the remaining respondents identifying that they were either not certain or choosing not to respond.
2. The existence of the second stage facilities is perceived as having an impact to some degree on the geographic accessibility to shelter services.
3. Half of second stage housing operator respondents identified that they perceived CMHC funding did not contribute to providing services that are easy to get to.
4. An equal proportion of second stage housing operator respondents perceived CMHC funding had contributed to the ability of the shelter to meet the needs of clients and children with physical disabilities “to no extent” as “to some extent.” Of those that perceived SEP as meeting the need to no extent, 86% had been recipients of SEP Renovation funding and 14% had been recipients of SEP New Construction funding; however, half of respondents received this funding before their tenure as a shelter operator.

#### **Supporting evidence**

##### ***Impact on availability***

As identified in EQ 3, administrative data is not identifiable by shelter type. Therefore, analysis on the extent to which SEP has increased availability of second stage housing is dependent on the qualitative results of key informant interviews.

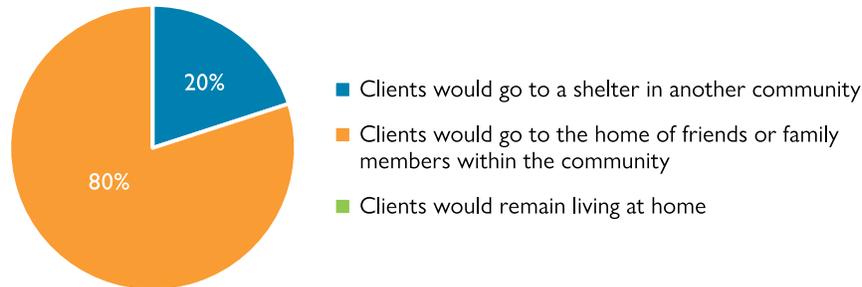
Note that 71% of shelter operator respondents identified that they operated a shelter (as defined within the SEP guidelines), while 29% of respondents indicated that they operated second stage housing in some form.<sup>44</sup> As such, the following analysis uses the responses of those 29% of respondents who identified as second stage housing operators.

In order to assess overall availability of second stage housing, second stage housing operators were asked to identify the capacity of the facility over the past five years. On average, second stage housing operators identified their facility as being used to full capacity 43% of the time. They were further asked to identify how often over the past five years there had been more people wanting to use the facility than they could accommodate, with 50% identifying that this occurred approximately half the time over the past five years.

Community representatives from these communities were asked to identify, in the absence of an available facility, what they perceived as next available option that would be most commonly used by persons fleeing domestic violence. As demonstrated in Table 16, 80% of community representative respondents believed persons fleeing domestic violence would go to the home of friends or family members within the community, while 20% believed they would go to a facility in another community.

<sup>44</sup> Of these second-stage respondents, 40% were shelters that provided longer stays for domestic violence victims where possible and 60% were facilities that operated as both emergency and second stage housing.

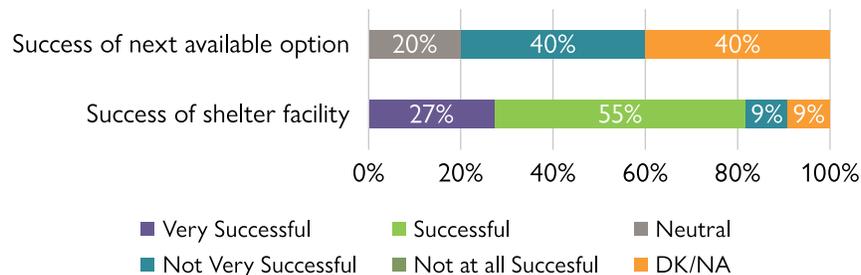
**Table 16: Next available option for persons fleeing domestic violence**



To assess the level of impact the facility had on providing available spaces to persons fleeing domestic violence, second stage housing operators and community representatives were asked to assess the extent to which they perceived their facility was successful in providing spaces to persons fleeing domestic violence at the time it is needed. They were also asked to assess the extent to which they perceived the next available option would be successful. It should be noted that this assessment was solely conducted for communities that had received SEP funding and therefore is not representative of all FN communities.

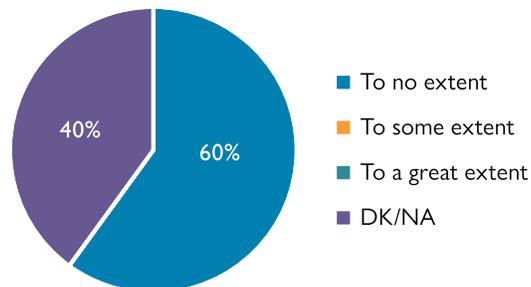
As shown in the table below 82% of respondents perceived the facility as being either “successful” or “very successful” in providing space to clients at the time it is needed. By contrast, 40% of respondents perceived the next available option to be “not very successful,” while the remainder responded that they were neutral, not certain of the level of impact, or chose not to respond. Therefore, the perception is that the second stage facilities are more effective than the next available option in providing available spaces to persons fleeing domestic violence at the time it is needed.

**Table 17: Level of success in providing available spaces to persons fleeing domestic violence at the time it is needed**



These second stage housing shelter operators were further asked about their perception in terms of the level of impact they believed CMHC funding had on the availability of their facility; where availability was defined as the facility’s capacity to serve more clients. Of respondents, 60% of second stage housing operators did not perceive that CMHC funding had resulted in any impact on the availability of the shelter, with the remaining respondents identifying that they were either not certain or choosing not to respond. Of these respondents, all were recipients of SEP Renovation funding. Further, 20% had been recipients of both New Construction funding and Renovation funding, however, the New Construction funding had been provided before their tenure as the second stage housing operator. As funding for New Construction was not expended over the period 2012/13 through 2016/17, it is reasonable that second stage housing operators would base their responses on their experiences with SEP Renovation, and thus that CMHC funding would be perceived as having had a minimal impact on availability of the facility.

**Table 18: Extent to which CMHC funding has resulted in the capacity to serve more clients**



**Impact on accessibility**

**Geographic accessibility**

In regards to geographic accessibility, second stage housing operators were asked whether their facility is easy for potential clients to get to.

- 60% said yes, identifying that their shelters assist in the provision of transportation by either arranging transportation through the shelter or paying for private transportation.
- 40% said no, identifying that transportation can be an issue, particularly for rural communities.

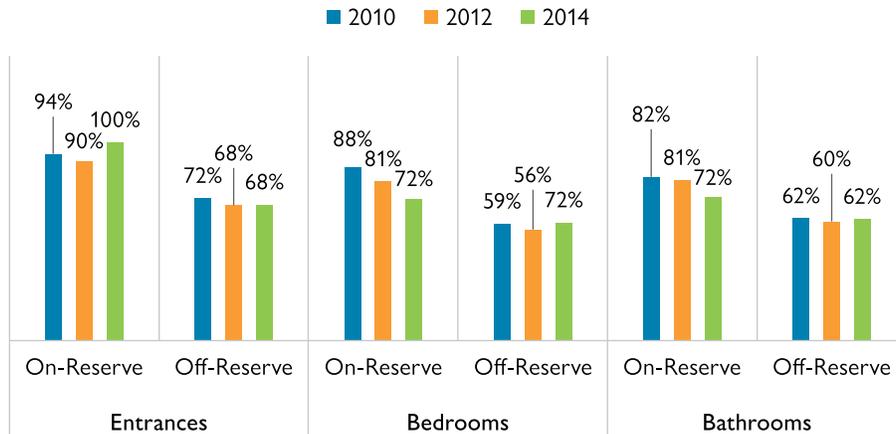
Both second stage housing operators and community representatives were asked to identify to what extent they perceived the facility was successful in providing shelter services that are easy to get to, with 66% of respondents identifying they perceived the facility as being “successful” or “very successful.” Further, second stage housing operators were asked if the facility did not exist, what would be the distance to the next available option, yielding an average distance of 70km from the community. When asked how successful the next available option would be in providing services that are easy to get to, 50% of community representative respondents perceived the next available option as being “not very successful.” Therefore, it can be demonstrated that the existence of the second stage facilities is perceived as having an impact, to some degree, on the geographic accessibility to shelter services.

In addition, second stage housing operators were asked to what extent they perceived CMHC funding contributed to the availability of services that are easy to get to, with 50% identifying that they perceived CMHC funding as contributing to no extent. Of these respondents, all were recipients of SEP Renovation funding. Further, 20% had been recipients of both New Construction funding and Renovation funding, however, the New Construction funding had been provided before their tenure as the second stage housing operator. As funding for New Construction was not expended over the period 2012/13 through 2016/17, it is reasonable that second stage housing operators would base their responses on their experiences with SEP Renovation, and thus that CMHC funding would be perceived as having had a minimal impact on the availability of services that are easy to get to.

**Physical accessibility**

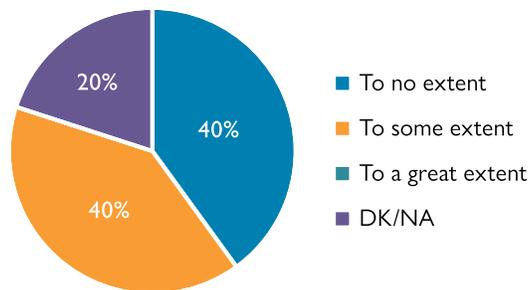
In regards to physical accessibility of second stage housing on-reserve, we can see from the THS data below that the percentage of on-reserve facilities with physical accessibility features exceed the percentage of off-reserve facilities with accessibility features. In fact, in regards to having at least one entrance, bedroom, or bathroom with accessibility features for those with disabilities, more that 72% of on-reserve second stage facilities reported having each of these features in 2014, as opposed to less than 68% of off-reserve second stage shelters. Further, 100% of second stage on-reserve respondents who completed the THS in 2014 identified as having at least one entrance with accessibility features for the disabled while this was only 68% in off-reserve second stage housing.

**Table 19: Transition Home Survey Data on Second Stage Housing with Accessibility Features**



Second stage housing operator respondents were asked to assess the level of success their facility had in providing access to persons with disabilities, with 63% perceiving their facility as being “successful” or “very successful”, and 9% perceiving their facility as being “not very successful.” Further, when asked to identify the extent to which these housing operators perceived CMHC funding had contributed to the ability of the shelter to meet the needs of clients and children with physical disabilities, 40% of respondents perceived that CMHC contributed “to no extent”, with another 40% perceiving that CMHC contributed “to some extent.” Of those that perceived CMHC as not having contributed to the ability of the facility to meet the needs of clients and children with physical disabilities, 86% had been recipients of SEP Renovation funding and 14% had been recipients of SEP New Construction funding.

**Table 20: Extent to which CMHC funding has contributed to the ability to meet the needs of clients and children with physical disabilities**



### **EQ 5: To what extent has SEP On-Reserve contributed to increased safety and improved shelter services for clients?**

#### **Findings**

1. The existence of shelters has an impact on the provision of safety for persons fleeing domestic violence in those communities for which shelters are accessible.
2. 53% of shelter operator respondents perceived that SEP contributed towards the provision of a safe and secure space for clients, while 33% perceived that CMHC did not contribute to this outcome. Of those respondents who perceived CMHC contributed “to no extent,” all had been recipients of SEP Renovation funding.
3. 29% of shelter operator respondents perceived that SEP did not contribute to their ability to provide shelter services while 28% perceived SEP contributed by at least some extent. Of those who responded that CMHC did not contribute to this outcome, all were recipients of SEP Renovation funding. Recipients of SEP New Construction funding largely identified SEP as improving their ability to provide shelter services either “to some extent” or “to a great extent.”

#### **Supporting Evidence**

##### ***Impact on safety***

Though the SEP guidelines do not provide definitions for either safety or security, the objective of SEP Renovation funding is to bring shelters to acceptable levels of health, safety and security for the occupants.

Eligible properties under SEP Renovation includes those that are substandard or deficient and require major repair or are lacking basic facilities in the categories of fire safety and building security. Further, eligible repairs under SEP Renovation include those that would provide an appropriate level of security for occupants, as well as provide safe program and play areas for children.

SEP New Construction requires applicants to include the steps an applicant will take in order to ensure the physical health, safety, and security of shelter residents and the facility within their proposal. Further, eligible capital costs under the program include building security provisions.

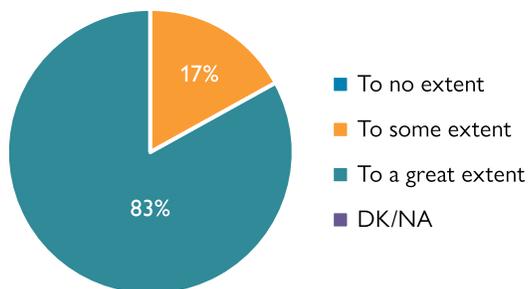
It should be noted that though SEP provides funding for safety and security features in both shelters and second stage housing, it is not the sole contributor towards this outcome. Per the FVPP guidelines, its stated objective is to improve the safety and security of Indigenous women, children and families, with fiscal support for this objective being provided through funding towards core shelter operations. As such, eligible expenses under FVPP include, but are not limited to, the following:

- secured shelter, both inside and outside the shelter, which includes a fence, alarm system, surveillance camera.
- secured file cabinets to maintain confidential documentation and case files.

Therefore, it can be difficult to separate the impact that CMHC has had through SEP on the safety and security of shelter clients from the impact ISC has made through the FVPP.

CMHC and ISC personnel were both asked to assess the extent to which they believed the existence of a shelter facility has on client safety and security, and 83% of respondents identified the existence of the shelter as contributing “to a great extent.”

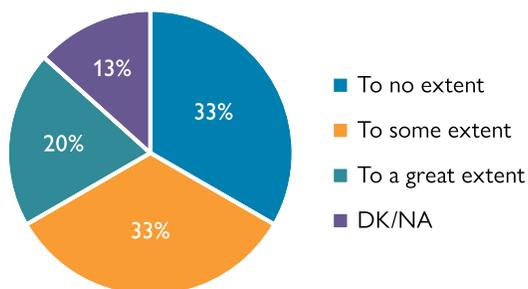
**Table 21: Extent to which the existence of a shelter facility impacts safety and security**



Shelter operators and community representatives were asked to assess the level of success that they perceived their facility had in providing a safe and secure space for clients, with 97% of respondents perceiving their facility as being either “successful” or “very successful.” When asked how successful they perceived the next available option would be at doing the same, only 33% of community respondents identified that the next available option would be either “successful” or “very successful.” Therefore, there is some consistency across respondents in the perception that the existence of the shelter has a positive impact on the provision of a safe and secure space for clients.

In regards to the contribution of CMHC funding towards the provision of a safe and secure space for clients, shelter operator perceptions were mixed; 53% of shelter operator respondents perceived CMHC funding through SEP had contributed “to some extent” or “to a great extent,” while 33% perceived CMHC contributed “to no extent.” Of those respondents who perceived CMHC contributed “to no extent,” all had been recipients of SEP Renovation funding.

**Table 22: Extent to which CMHC funding has contributed to safety and security**



*Totals may not add due to rounding.*

**Impact on services**

The provision of services is outside the scope of SEP, as services are provided by ISC through the FVPP. Therefore, SEP can only affect improvements to shelter services to clients indirectly.

Under SEP Renovation, the program is limited to supporting eligible repairs, including those which provide adequate and safe program areas for children. Therefore, SEP Renovation only has the potential to affect improvements in shelter services indirectly through supporting physical improvements to the existing facilities.

SEP New Construction maintains a stronger alignment to the provision of shelter services compared to SEP Renovation. SEP New Construction guidelines identify that the program prioritizes projects in geographic areas where support facilities and counselling services are available, with applicants being required to provide an overview of how the project will be operated; including the delivery of services, and client counselling and follow-up. For both emergency shelters and second stage housing projects, the applicant must explain how the project will coordinate its activities/services

with other groups, organizations or agencies providing social services or care, such as ISC's FVPP. As SEP New Construction provides funding for 100% of capital costs, the design of the shelter could facilitate the provision of services (e.g., rooms for counselling or other services).

A confirmation of operating funding is required in order for a SEP New Construction loan to be approved. These operating costs are paid by ISC through the FVPP on a per diem basis for services provided to or for clients who reside on-reserve. Per the FVPP guidelines, services covered through the program may include, but are not limited to, the following:

- Staff salaries and benefits;
- Professional development;
- Board and committee operations;
- Utilities;
- Appliances, furniture and equipment;
- Office supplies and equipment;
- Crisis line;
- Client transportation; and,
- Prevention activities, training forums, workshops and outreach.

In summary, responsibilities between SEP and FVPP are such that SEP provides funds towards capital costs for renovations and new construction, while FVPP provides the operational costs towards the provision of services. Therefore, while SEP New Construction maintains a stronger alignment to the outcome of improved shelter services than SEP Renovation, both components of SEP only have the ability to indirectly contribute to this outcome.

Both CMHC and ISC head office personnel were asked to identify to what extent they perceived that the existence of the shelter impacted the existence of services. Of respondents, the majority (67%) perceived that the existence of a shelter impacted the existence of services "to a great extent," with the 17% of respondents perceiving the existence of the shelter as having an impact "to some extent." Both respondent groups were asked to assess the impact that the existence of a shelter had on the effectiveness of the services. To this question, 42% perceived there would be an impact "to a great extent," while 31% perceived there would be an impact "to some extent."

Shelter operators were then asked to identify the extent to which they perceived that CMHC funding resulted in improvements in their ability to provide shelter services. Of respondents, 29% perceived that CMHC funding contributed "to no extent," 21% "to some extent," 7% "to a great extent" and 43% reported that they were not sure of the level of impact of CMHC funding. It is possible that shelter operators did not understand CMHC's contribution or role in this regard.

Note that of those who responded "to no extent" and those who identified being unsure, all were recipients of SEP Renovation funding. Recipients of SEP New Construction funding largely identified CMHC funding as improving their ability to provide shelter services either "to some extent" or "to a great extent."

### **EQ 6: To what extent has SEP On-Reserve contributed to improved community response to domestic violence?**

#### **Findings**

1. SEP New Construction recipients perceive the program as having contributed to improving community response to domestic violence.
2. SEP Renovation recipients largely perceive the program as not having contributed to improving community response to domestic violence.

#### **Supporting evidence**

The 2009 SEP evaluation states that “the presence of a shelter in a [Aboriginal] community was reported by key informants to have significantly enhanced broader responses to family violence. Key informant data indicated that the presence of a shelter was correlated with changes in community responses to family violence since 2001 (increased awareness of family violence, improved agency collaboration, etc.)” That evaluation provided one example of how this impact can occur where there was a case in which SEP resulted in new program space to initiate family violence services that employed traditional approaches, as well as counselling services designed specifically for men.

This sentiment is echoed by CMHC and ISC Head Office respondents for this evaluation with 56% identifying that they perceive the presence of a shelter as impacting the community’s response to domestic violence “to some extent” and 31% “to a great extent.” Further, when asked to rate the success of their shelter facility in improving the community’s response to domestic violence, 72% of shelter operator respondents perceived their shelter as being either “successful” or “very successful.”

However, shelter operators were mixed in terms of their perception of the extent to which CMHC funding resulted in improvements to the shelter facilities’ impact on the community’s response to domestic violence, with an equal split between those who perceived CMHC as having made an impact “to no extent” and those who perceived an impact “to some extent.” Note that of those who perceived CMHC as having an impact “to some extent,” 60% were recipients of SEP New Construction, while those who perceived CMHC as having an impact “to no extent” were all recipients of SEP Renovation funding. It is possible that the impact of renovations may go unnoticed compared to those impacts of a newly constructed building; as renovations ensure the physical building is sound, but may not change or necessarily improve a facility’s ability to respond to domestic violence.

In regards to going one step further and assessing the success of their shelter facility in obtaining broad community respect and support, over 95% of shelter operators respondents identified their shelter as being “successful” or “very successful.” This sentiment is again echoed by community representative respondents, with 73% identifying the shelter as having close ties to the community and community organizations.

However, in terms of the perception of the impact that CMHC funding had in regards to the facility obtaining broad community respect and support, 21% perceived this occurred “to no extent,” 36% “to some extent” and 42% were unsure. Of those who responded “to no extent,” all were recipients of SEP Renovation funding. While those who responded “to some extent” or identified as being unsure were both recipients of SEP New Construction and SEP Renovation. That said, it would not be unexpected for CMHC funding to be weakly correlated to the success of the shelter facility in obtaining broad community support, as SEP programming is targeted towards the capital costs for renovations and new construction and not intended to directly contribute to the ability of the shelter to obtain broad community respect and support.

## 2.3 Economy and Efficiency

### EQ 7: Is SEP On-Reserve being delivered to stakeholders in an economic and efficient manner?

#### Findings

1. Though promotion of the program may be efficient, there may be more effective means of promoting the program to prospective clients.
2. The application process is unclear to both clients and CMHC Specialists.
3. The selection process for SEP New Construction used for Budget 2016 funding was both economic and efficient.
4. The lack of a clear and integrated approach between SEP and FVPP may inhibit economic and efficient delivery of SEP.
5. The lack of an integrated approach between SEP and FVPP may inhibit economic and efficient delivery on outcomes.
6. The administrative costs relative to SEP expenditures are reasonable given the program parameters, even though they are high relative to other grant and contribution programs.

#### Supporting evidence

**Finding 1:** Though promotion of the program may be efficient, there may be more effective means of promoting the program to prospective clients.

The application process for both SEP Renovation and SEP New Construction rely on the relationships that regional CMHC Specialists have with their client First Nation Communities. Under SEP Renovation, the regions rely on CMHC Specialists to promote the program. Similarly, SEP New Construction, per the 2016 process, relies on the regional CMHC Specialists to market the Expression of Interest to First Nations. Information is also placed on CMHC's and ISC's websites to advertise the program; and there was a news release. Though this may be a cost efficient way to manage the promotion of the program, it may not be as effective.

This was illustrated in the KI interviews where 71% of CMHC and ISC Head Office respondents identified that they believed there is a potential lack in publicly available information for prospective clients. Some CMHC Specialists echoed this sentiment, with 33% noting that they had no means for raising awareness of SEP New Construction funding with communities that are not current CMHC clients. Though information is made available on CMHC's website, the perception among these respondents was this may not be sufficient, with one noting that "although the information is available, [it] doesn't mean it is out there." Shelter Operator respondents agreed.

When asked an open-ended question to whether they had any suggestions about how CMHC could improve their program, almost two-thirds (65%) identified that CMHC needs to promote the program. That said, SEP funding has been limited and inconsistent (e.g., no standard budget and no SEP New Construction funds were expended for five years between 2012/13 and 2016/17) and SEP New is dependent on ISC's FVPP to provide operating funding, therefore is understandable why the program has not been significantly promoted.

A decrease in awareness can be seen through analyzing results from the THS as well. When respondents were asked to identify how they plan to fund necessary repairs. In 2010, 82% of on-reserve respondents identified SEP, but in 2012 this dropped to 61%, and decreased to 50% in 2014; suggesting that the awareness of the SEP has decreased in First Nation communities.

### **Finding 2: The application process remains unclear to both clients and CMHC Specialists**

When asked about the level of knowledge they perceived First Nation communities had in regards to CMHC decisions, 80% of CMHC Specialists identified that they believed the process was not being made clear. Further to this, when asked about the level of knowledge they perceived FN communities had in regards to eligibility for funding and understanding of the application process, 43% of CMHC Specialists identified that more knowledge could be beneficial to FNs, as some of their clients did not appear to be clear on these aspects of program. Further to this, 80% of CMHC specialists identified that there was a lack of clarity internally in regards to the application processes within CMHC as well. Some noted that those CMHC Specialists and FN communities with more experience with the program had a better understanding of the application process.

In order to address this potential lack of clarity in regards to the application process, it is recommended to develop further program documentation. For example, one example for inspiration may be to look to CMHC's self-assessment guide for home adaptations for seniors' independence.<sup>45</sup> A SEP maintenance and repair guide could leverage CMHC expertise to provide a document to help Shelter Operators identify items that may require repair or be eligible under SEP Renovation to increase First Nations' capacity for overall asset management. It could also enable CMHC to provide examples of eligible repairs under SEP Renovation or examples of SEP New Construction design approaches. It also could identify eligibility of repairs or building improvements (e.g., minor repairs, building security) that would be eligible under ISC's FVPP, as there is some overlap in eligible repairs between SEP and FVPP. This type of documentation could be more accessible to clients since the current approach for SEP Renovation is that successful applicants have their shelter inspected by a technical professional to identify 'mandatory' repairs that are needed to meet minimum health and safety standards. A maintenance and repair guide could provide ongoing guidance in between applications to the program.

This is in line with recommendations garnered through key informant interviews with 50% of CMHC Head Office personnel identifying that CMHC's unique expertise in housing could be better leveraged to support First Nation communities, and 56% of shelter operators who reportedly being dissatisfied with CMHC's ability to provide clear information on the program. One shelter operator specifically mentioned that they learned how to identify which items were in need of repair from an inspector and that this information was invaluable to them for identifying needed repairs going forward. The development of a maintenance and repair guide may have the potential to provide clear information for both identifying and defining repair needs within shelters and second stage housing on-reserve.

### **Finding 3: The selection process for SEP New Construction used for Budget 2016 Funds was both economic and efficient**

While Budget 2016 funding provided for five new shelters, CMHC received 38 applications for funding suggesting a strong level of need. As described in the program description (1.2.1) a new two-stage application process was undertaken. CMHC and ISC Head Office personnel who had participated in the selection process for Budget 2016 were asked to assess how the process could be improved going forward. Of the respondents, 75% perceived that the process went well. The other 25% of respondents provided the following recommendations:

- There is a need to work more closely with the community on advanced planning
- SEP should be provided with a consistent budget to enable the selection process to consider long-term planning solutions for First Nation communities

<sup>45</sup> CMHC. Maintaining Seniors' Independence through Home Adaptations: A Self-Assessment Guide.

### **Finding 4: The lack of a clear and integrated approach between SEP and FVPP may inhibit economic and efficient delivery of SEP**

More than 80% of CMHC and ISC Head Office respondents identified a lack of coordination between CMHC and ISC in regards to both SEP and FVPP and that they perceived could be improved. These respondents identified a siloed approach to the two programs, which they believed could be streamlined to ensure more economic and efficient delivery of the program. Examples of siloed components between SEP and FVPP included the following:

- **Program Administration:** Many (71%) CMHC and ISC Head Office respondents identified that the burden of administrative paperwork between SEP and FVPP was duplicative and potentially unnecessary.
- **Program Funding:** Many (83%) CMHC and ISC Head Office respondents noted a lack of alignment between SEP with FVPP's operational funds. Further, half of CMHC Specialist respondents identified that in the past there have been difficulties coordinating SEP New Construction with matching operating funds with ISC. Both CMHC and ISC respondents provided examples of instances where a lack of available funding from the one program prevented the ability to undertake projects in the other. Both CMHC and ISC respondents perceived this as inhibiting the two programs from being delivered both effectively and efficiently.

In addition to identifying the desire for enhanced coordination between ISC and CMHC, many Head Office respondents identified a lack of clarity in regards to the roles and responsibilities to be undertaken between SEP and FVPP. Items that were identified as requiring clarity in roles and responsibilities included the following:

- **Eligible work:** As noted above, repair costs may be covered under both SEP Renovation as well as through FVPP, as can be the case with building security. This was also identified by a few CMHC and ISC Head Office personnel; with some noting that the flexibility enabled each program to address ad-hoc requests with any funding left available, and others noting that this flexibility inhibited clarity on the roles and responsibilities between the two programs.
- **Ministerial Loan Guarantee process:** A few CMHC and ISC Head Office respondents noted that they were unclear as to the roles and responsibilities of CMHC and ISC in regards to the process for Ministerial Loan Guarantees for SEP.

One CMHC Specialist noted that the administrative burden for ensuring the required administrative paperwork was provided to CMHC for SEP is placed on the applicant (First Nation sponsor); who is responsible for their individual administrative processes between SEP and FVPP. Therefore, it is possible that having the client act as the intermediary between the two programs creates a lack of clarity of roles and responsibilities as it could limit the ability for CMHC and ISC to communicate and collaborate on application processes with each other. It is further possible that this administrative burden fosters the lack of clarity for the client as half of CMHC specialists identifying that they believe First Nation communities have difficulties understanding their responsibilities in managing their separate budgets and reporting requirements from ISC and CMHC for FVPP and SEP, respectively.

This sentiment was supported by key informant interviewees as 80% of CMHC and ISC Head Office respondents called for a single point of service for the two programs. This single point of service could take various forms:

1. The single point of service could simply be provided through one window for applicants to access both SEP and FVPP. Administrative requirements for these programs could remain separate on the back-end in order to enable each program to receive the information that they need to move forward with their respective processes. However, as SEP and FVPP are complimentary programs, there would still be a need to clarify the roles and responsibilities of CMHC and ISC for the back-end of the service. Further, the development of such a service may support enforcement of these roles and responsibilities.

2. Or, the process of developing a single window service could be leveraged by both CMHC and ISC to streamline the development of common administrative tools as well as enable the streamlined planning of funds on the back-end. Further, this service could be used going forward to clarify and enforce the roles and responsibilities of both CMHC and ISC going forward.

Regardless of the tool selected, it is clear that there is demand to streamline program administration and funding between SEP and FVPP, as well as clarify the roles and responsibilities between the two programs. Moreover, in the context of government direction on Canada's renewed relationship with Indigenous Peoples, the Government is working towards modernizing the Government of Canada's institutional structure and governance so that First Nations, Inuit, and Métis Peoples can build capacity that supports implementation of their vision of self-determination.<sup>46</sup> In this context, the delivery format of a program to address the shelter needs of Indigenous people fleeing domestic violence could evolve from government administration/delivery (i.e., SEP/FVPP) to full Indigenous administration/delivery over the long-term.

**Recommendation:** *CMHC should consider working with ISC and other relevant partners, as appropriate, to seek long-term dedicated funding, streamline program administration and clarify the roles and responsibilities related to shelters and second stage housing for all persons in Indigenous communities fleeing violence in the context of government direction on Canada's renewed relationship with Indigenous Peoples.*

### **Finding 5: The lack of an integrated approach between SEP and FVPP may inhibit economic and efficient delivery on outcomes**

In regards to on-going monitoring and follow-up, neither SEP Renovation nor SEP New Construction requires these activities once funding has been advanced. This may be viewed as being in line with the guidelines, which only ensure that funding is advanced towards supporting units of shelters and second stage housing. However, 100% of CMHC and ISC Head Office respondents identified that follow-up should be conducted under SEP. This view is shared by CMHC Specialists as well as shelter operators; with 67% of CMHC Specialist respondents identifying that they would appreciate more follow-up in regards to SEP files, and a further 67% of shelter operators identifying themselves as being either "dissatisfied" or "very dissatisfied" with the level of follow-up conducted by CMHC.

Further, 17% of CMHC and ISC respondents noted that ISC conducts some level of follow-up under FVPP through inspections, but identified there was a gap between the information provided by the inspection and CMHC's needs for monitoring and reporting. An additional 33% of respondents identified that monitoring and follow-up would be beneficial in order to assist in providing the best solutions to communities. For example, as further illustrated in EQ1, the ACRS reports were a one-time inspection conducted in 2016 and funded by ISC. These reports were quite detailed and provided descriptions of deficiencies (with pictures), a general condition rating and an overall O&M rating. Shelter operators could use these reports to apply to either FVPP or CMHC for minor and major repairs, respectively or manage the overall asset.

Given that both SEP and FVPP contribute to some degree towards the outcomes of;

- Increased availability of shelters and second-stage housing for persons fleeing domestic violence;
- Improved safety and access to shelter services for persons fleeing domestic violence; and,
- Supporting the community response to the issue of domestic violence.

And given that, as noted under Finding 4, both CMHC and ISC play a role in the delivery processes for SEP, it is recommended that CMHC and ISC work together in the development of key performance indicators (supported by integrated data collection tools) for both SEP and FVPP together. Working together on defining data that can be leveraged, (e.g. data collected through on-going monitoring and follow-up), there is potential to

<sup>46</sup> Mandate Letter for Minister of Crown-Indigenous Relations and Northern Affairs.

provide both programs with the most cost-efficient means of accessing the information they require to support effective decision-making. Further, streamlining data collection through on-going monitoring and follow-up activities may ensure that both SEP and FVPP are targeted together in addressing common outcomes, making both more effective through the achievement of clearly defined common goals.

It should be noted that the KI interviews were not the only ones who identified the need for better interjurisdictional co-operation. As part of their preliminary conclusions, the NIMMIWG interim report states that if political jurisdictions are serious about ending violence against Indigenous women and girls, they have to improve their ability to work together, as half of the 1,200 recommendations in existing reports cite or are related to interjurisdictional co-operation.

**Recommendation:** *CMHC should consider working with ISC and other relevant partners, as appropriate to confirm common outcomes and define integrated key performance indicators for SEP and FVPP (or any successor program or initiative related to shelters and second stage housing).*

**Finding 6:** The administrative costs relative to SEP expenditures are reasonable given the program parameters, even though they are high relative to other grant and contribution programs

Based on available administrative data from the program, it is estimated that SEP administrative costs<sup>47</sup> as a percentage of funds expended are 19.3%. Even though SEP is technically a loan program, the typical percentage for a grants and contributions program is 5-10%. Additional differences between SEP and other programs that should be considered when using this percentage for evaluating cost-effectiveness are:

- SEP is a very small program, and administrative percentages are typically larger for small programs;
- The client population for SEP consists of First Nations throughout Canada, with many located in remote locations and therefore the administrative burden may be higher; and
- There are no available comparables against which to assess SEP.

<sup>47</sup> CMHC's administrative costs represent the fully allocated operating costs. It includes direct salary & fringe benefits, direct non personnel costs (i.e: travel, training, C&M, etc.), allocated IT costs and allocated overhead costs (i.e., HR, Legal, Finance, etc.).

### EQ 8: Are there more economic and efficient ways to design SEP On-Reserve?

#### Findings

1. SEP could be made more economic and efficient through the provision of long-term predictable and dedicated funding to support the achievement of outcomes.
2. The existing loan maximums for SEP are adequate.
3. The current design of SEP is not intended to respond to all Indigenous persons fleeing violence.
4. The design of SEP does not allow for alternative approaches beyond the traditional shelter and second stage housing model. This may limit efficient achievement of program outcomes and objectives.

#### Supporting Evidence

**Finding 1: SEP could be made more economic and efficient through the provision of long-term predictable and dedicated funding to support the achievement of outcomes.**

As found in EQ1, there is a critical need to increase the supply of shelters and second stage housing and there is an ongoing need for funding to repair existing shelters (EQ1, Findings 3 and 4); however, the existing dedicated budget for SEP ends March 31, 2019. Among all key informant interviews, from shelter operators to community representatives, CMHC and ISC staff, budget levels were consistently raised as a concern. CMHC and ISC respondents overwhelmingly agreed (91%) that overall budget levels are not adequate for SEP. Further, only 33% of shelter operator respondents reported being satisfied with the level of funds being provided by CMHC. Many KI respondents suggested that budgets going forward need to be predictable and consistent.

CMHC has a suite of renovation programs on-reserve, with SEP being just one program among this suite.<sup>48</sup> Over the course of the study period, the budget that was allocated regionally for this suite of renovation programs, meaning that each region decided the amount they would allocate to each of the programs under the suite of renovation programs. While this provides flexibility for program staff to use funds between the suite of renovation programs on-reserve, it can result in the prioritization of some renovation programs and reduce the effectiveness of others in achieving their outcomes. For example, this funding model may have contributed to \$0 being expended for SEP New Construction for five full fiscal years (between 2012/13 and 2016/17) over the study period. That said, SEP New Construction is dependent on ISC to provide the operating funding for the shelters, so this is a contributing factor on why no funding was provided over five years. As a result, SEP's budget has been inconsistent year over year.

The sentiment of dedicated funding for SEP is echoed within KI interviews. When asked whether it is important that funding be allocated to on-reserve shelters separate from off-reserve shelters, CMHC and ISC respondents overwhelmingly (83%) agreed. In particular it was noted that there is a “need for a specific budget for Indigenous shelters, otherwise Indigenous communities will be underserved.” It should be noted that the \$10.4 million provided over three years for SEP New Construction was the first time since 2007 that SEP had dedicated funding, as well as the necessary operating funding from ISC.

It was not only KIs who have suggested that there is a need for a dedicated budget. In a September 2017 letter to Minister Duclos, Women's Shelters Canada proposed that 10% of the NHCF (\$50 million annually) be earmarked for shelters and second stage housing. They argue that this will increase the level of transparency in how and when funds are disbursed and address regions that are not adequately served, notably, remote areas, the North and Indigenous women on-reserve.<sup>49</sup> While they do not mention shelters specifically, CHRA's Indigenous Caucus has called on the

<sup>48</sup> Residential Rehabilitation Assistance Program (RRAP); Home Adaptations for Seniors' Independence (HASI); and the Emergency Repair Program (ERP).

<sup>49</sup> Women's Shelters Canada. Letter to Minister Duclos. September 2017.

Government to provide funding towards Indigenous housing solutions according to a proportionate share of need and a fourth distinctions-based housing strategy to support Indigenous peoples living in urban, rural and northern parts of Canada.<sup>50</sup>

### **Finding 2: The existing loan maximums for SEP are adequate**

It should be noted that the individual loan amounts were not raised as an issue amongst KI respondents. For SEP New Construction, 100% of capital costs to build a new shelter or second stage housing project are eligible, while for SEP Renovation, repairs and improvements up to \$60,000 per unit are eligible. As observed under EQ1, Shelter Operators estimated the total repairs needed in the shelter over the next five years to average approximately \$83,000 per project. Therefore, existing loan amounts for SEP appear to be adequate.

### **Finding 3: The current design of SEP is not intended to respond to all Indigenous persons fleeing violence**

Domestic violence is typically seen by society as either intimate partner violence between a heterosexual couple (with the man most often seen as the perpetrator) or a parent and child/youth relationship (where the parent is typically seen as the perpetrator); however, there are others fleeing violence who do not always fit into this traditional model and who may have different barriers to seeking help and differing shelter needs once they leave the violence. This includes LGBTQ2 and the trans community, male victims, youth and those fleeing situations of human trafficking or sex trade.<sup>51, 52, 53, 54</sup>

As mentioned in EQ1, the continuing impacts of colonization on Indigenous communities in Canada has been identified as one of the root cause of domestic violence. The interim report for NIMMIWG observes that much of the federal funding designated for Indigenous people is available only to those with Indian Status and consequently, this does not adequately address the needs of Inuit and non-status Indigenous people or governments that serve majority Indigenous populations.<sup>55</sup> On family violence in particular, Pauktuutit Inuit Women of Canada point out that despite the North having some of the highest rates of domestic violence in the Canada, more than 70% of the 53 Inuit communities do not have a shelter for those fleeing violence and there is no second stage housing in the North. They also state that while ISC provides operational funding for shelters on-reserve and reimburses costs for off-reserve shelter services used by First Nations women who ordinarily reside on-reserve, as Inuit communities are not reserves, shelters serving Inuit women in the north, cannot access this funding.<sup>56</sup> Women's Shelters Canada and other organizations like the YWCA have also made such arguments of the need to prioritize shelters and second stage housing, especially in the north.<sup>57</sup>

The 2011 SEP Guidelines were compared to the 2016 guidelines in terms of eligibility. The 2016 SEP Guidelines indicate, "The program is available on reserves and lands set aside by the federal government on behalf of First Nations Peoples, including lands negotiated under a Treaty Settlement or Land Claim." Therefore, a First Nation with a land claim or treaty is eligible for SEP but an Inuit government with a land claim agreement or treaty is ineligible for SEP. Currently, federal funding to support the housing needs of individuals fleeing violence in northern areas not on-reserve (including Inuit communities and Inuit land claim holders) is delivered by the provincial/territorial governments.

<sup>50</sup> Canadian Housing and Renewal Association. *A For Indigenous by Indigenous National Housing Strategy*. May 2018.

<sup>51</sup> NIMMIWG. Interim Report. p. 54.

<sup>52</sup> National Coalition of Anti-Violence Programs. *Lesbian, Gay, Bisexual, Transgender, Queer and HIV-Affected Intimate Partner Violence in 2016*.

<sup>53</sup> Public Safety Canada. *Trafficking of Aboriginal Women and Girls*, May 2014.

<sup>54</sup> Canadian Women's Foundation. "No More: Ending Sex Trafficking in Canada." *National Task Force on Sex Trafficking of Women and Girls in Canada*, Fall 2014.

<sup>55</sup> NIMMIWG. Interim report. p. 42.

<sup>56</sup> Pauktuutit Inuit Women of Canada. *Shelters and Transitional Housing*.

<sup>57</sup> YWCA. "Life Beyond Shelter: Toward Coordinated Public Policies for Women's Safety and Violence Prevention." October 2009.

Federal funding is provided to P/Ts who can choose to use the funding amongst broad spectrum of housing needs (new supply, renovation of existing stock, rent supplements, shelter allowances) and building new or repairing existing shelters/transitional housing off-reserve is eligible for federal funding. However, similar to SEP, federal funding provided to P/Ts through CMHC does not cover the operation of these shelters and as such, these funds would need to come from the provincial/territorial governments. This could be challenging if a P/T believes that Indigenous matters are a federal responsibility and expect additional federal funding. As communicated in EQ2, until the distinctions-based housing strategies are announced, it is unclear whether funding for shelters/second stage housing for persons fleeing domestic violence will be included under these strategies.

The Government has made several announcements towards the advancement of rights recognition and greater self-determination for Indigenous People. In particular, Budget 2018 announced that ISC will work with Indigenous partners to improve the quality of distinctions-based services for First Nations, Inuit and the Métis Nation, including on issues of housing. A distinctions-based approach means that the unique rights of First Nations, the Métis Nation and the Inuit are acknowledged, affirmed and implemented, which is based on the 10 principles respecting the Government's relationship with Indigenous peoples.<sup>58</sup> Budget 2018 stated that the Government and Indigenous partners are working together to ensure that Indigenous Peoples have greater control over housing in their communities.

Budget 2018 also announced that it is replacing the Aboriginal Skills and Employment Training Program with an Indigenous Skills and Employment Training Program with a view of a distinctions-based approach and as such, three Indigenous groups would be eligible for funding. The mandate of the Minister for Crown-Indigenous Relations and Northern Affairs is to modernize the Government's institutional structure and governance so that First Nations, Inuit, and Métis Peoples can build capacity that supports implementation of their vision of self-determination.<sup>59</sup> Therefore, it is possible that the Government could expect a distinctions-based approach for the construction, renovation and maintenance of shelters and second stage housing for all Indigenous people fleeing violence.

In this context, as a result of this government direction, a review of the design of SEP and off-reserve shelter/second stage housing programs (that could assist Inuit and Métis individuals fleeing violence) should be conducted since SEP is provided only to First Nations and therefore CMHC may want to consider how to incorporate a distinctions-based approach in program design in order to advance reconciliation.

**Finding 4: The design of SEP does not allow for alternative approaches beyond the traditional shelter and second stage model. This may limit efficient achievement of program outcomes and objectives.**

When asked for alternative models that could better address the needs of those who experience domestic violence, shelter operator respondents (41%) as well as CMHC/ISC respondents (44%) both identified the need for culturally sensitive services and holistic approaches. Examples provided by respondents included: elders counselling, meditation groups, preventive services, services for abusers, and making shelters available for abusers to reduce the need for persons fleeing domestic violence to leave their home. Indeed, when asked how their existing shelter could be improved, one-third (33%) of community representatives respondents identified the need for spaces and services for men; for both victims and perpetrators.

Currently, SEP is limited to providing capital funding to build new and renovate existing shelters and second stage housing. Off-reserve, provinces and territories have used their housing funding to support a broader range of accommodations for persons fleeing domestic violence. This includes building new and renovating existing shelters and second stage housing, and in 2011 provinces and territories were given the flexibility to use their federal housing

<sup>58</sup> Canada. Department of Justice. 10 Principles Respecting the Government of Canada's Relationship with Indigenous Peoples.

<sup>59</sup> Canada. Prime Minister's Office. Mandate Letters. Minister of Crown-Indigenous Relations and Northern Affairs.

funding to also provide shelter allowances or rent supplements to persons fleeing violence. Increasing supply and keeping the existing stock in good repair is very much needed, but broadening SEP to provide rent supplements or portable shelter allowances could enable more efficient achievement of outcomes, especially in rural/remote communities.

The following provides a high-level review of some cases where alternative approaches have been employed:

### **Safe Home Network**

A 'safe home network' is a network of private accommodations (often in rural and remote areas where there is no full-fledged operating shelter or second stage housing) that provides short-term emergency housing for women fleeing domestic violence. The safe home could be an apartment/townhouse unit, a room in a private residential home, or a hotel/motel room. Each network could have one or more accommodation type. Data and research is very limited on these networks. According to the 2014 Transition Home Survey, there were 17 safe home networks known to be in operation.<sup>60</sup>

A literature review for this evaluation found that BC has a Safe Home network with currently 27 networks in operation and a 2011 study found that 2009/10 funding was \$1.2 million.<sup>61</sup> BC's safe homes provide support services, referrals, and assistance with planning next steps. Of its network, 80% of BC's networks include rooms in a hotel/motel rooms and close to half (46%) include rooms in private homes. These residential homes are operated by families where in many cases, the families are compensated for their time through a per diem, honorarium or stipend for nights when women stay with them. The families provide emotional supports, food and some provide transportation to help women get to appointments. Some of the residential homes are located close to town, and therefore, have amenities nearby, while others are located in more secluded rural areas.

Additional research would be helpful and further analysis would be required to determine whether this model could be applicable in the on-reserve context.

### **Alternative Approaches in Indigenous Communities**

Alternative models for addressing domestic violence that have been employed in Indigenous communities include the following:

- **Yuendumu Safe House, Australia**—This is a domestic violence shelter whereby the operational rules and policies are established by the women in the community, based on their traditional culture. The senior women in this community have built up a tradition of identifying and addressing community problems, and, as a result, domestic violence is perceived as a problem for the whole community, not just the families involved.
- **Te Whakaruruhau Maori Womens' Refuge, New Zealand**—This is an emergency shelter that delivers counselling services and education based on holistic healing principals derived from Maori cultural values where cultural sensitivity is emphasized. The refuge also provides well-being services focused on advocacy within the community and helps women transition to violence-free lives. It is governed by a local board.
- **Community Holistic Healing Circle, Manitoba**—This model deals with prevention and treatment and involves a 13-step healing process (healing circles), which includes both the victim and the offender, aimed at promoting reconciliation and self-responsibility. The healing process is based on the seven Midewin teachings of the Anishnabe people.

<sup>60</sup> Statistics Canada. "Shelters for Abused Women in Canada, 2014" *Juristat*.

<sup>61</sup> BC Housing. *Understanding Women's Safe Home Programs in BC*, June 2011.

Given the interdependence of SEP with ISC's FVPP, the design and implementation of alternative models would require a combined effort from both CMHC and ISC; as ISC is responsible for operating funding which would include supporting the provision of culturally sensitive services or other operational aspects associated with the implementation of alternative and holistic approaches.

### **Overall Assessment**

Further, there could be a benefit from undertaking a review of whether SEP would more effectively and efficiently achieve program outcomes through including alternative approaches within the design of the program. For example, a review of programs currently designed to meet the needs of those fleeing domestic violence could be conducted to identify whether it would be economic and efficient to expand the scope of these programs to meet the needs of those fleeing other forms of violence (e.g., including LGBTQ2/trans, human trafficked and those leaving the violence associated with the sex-trade). In addition to research and analysis, consultation of relevant parties (CMHC and ISC policy and program individuals, Indigenous organizations and governments, as well as shelter operators and housing managers) should be conducted in order to consider opportunities to redesign SEP in order to address the issues identified in this evaluation. However, without long-term, dedicated funding, there will not be an opportunity to consider redesign options for SEP.

In this context, the following recommendations are being made following findings from EQ8 as well as preceding evaluation questions (EQ1, Findings 3 and 4; EQ7 Finding 4).

**Recommendation:** *(As stated in EQ7) CMHC should consider working with ISC and other relevant partners, as appropriate, to seek long-term dedicated funding, streamline program administration and clarify the roles and responsibilities related to shelters and second stage housing for all persons in Indigenous communities fleeing violence in the context of government direction on Canada's renewed relationship with Indigenous Peoples.*

**Recommendation:** *CMHC should consider undertaking a review of whether SEP would more effectively and efficiently achieve program outcomes through the inclusion of alternative approaches within the design of the program (or any successor program or initiative related to shelters and second stage housing).*

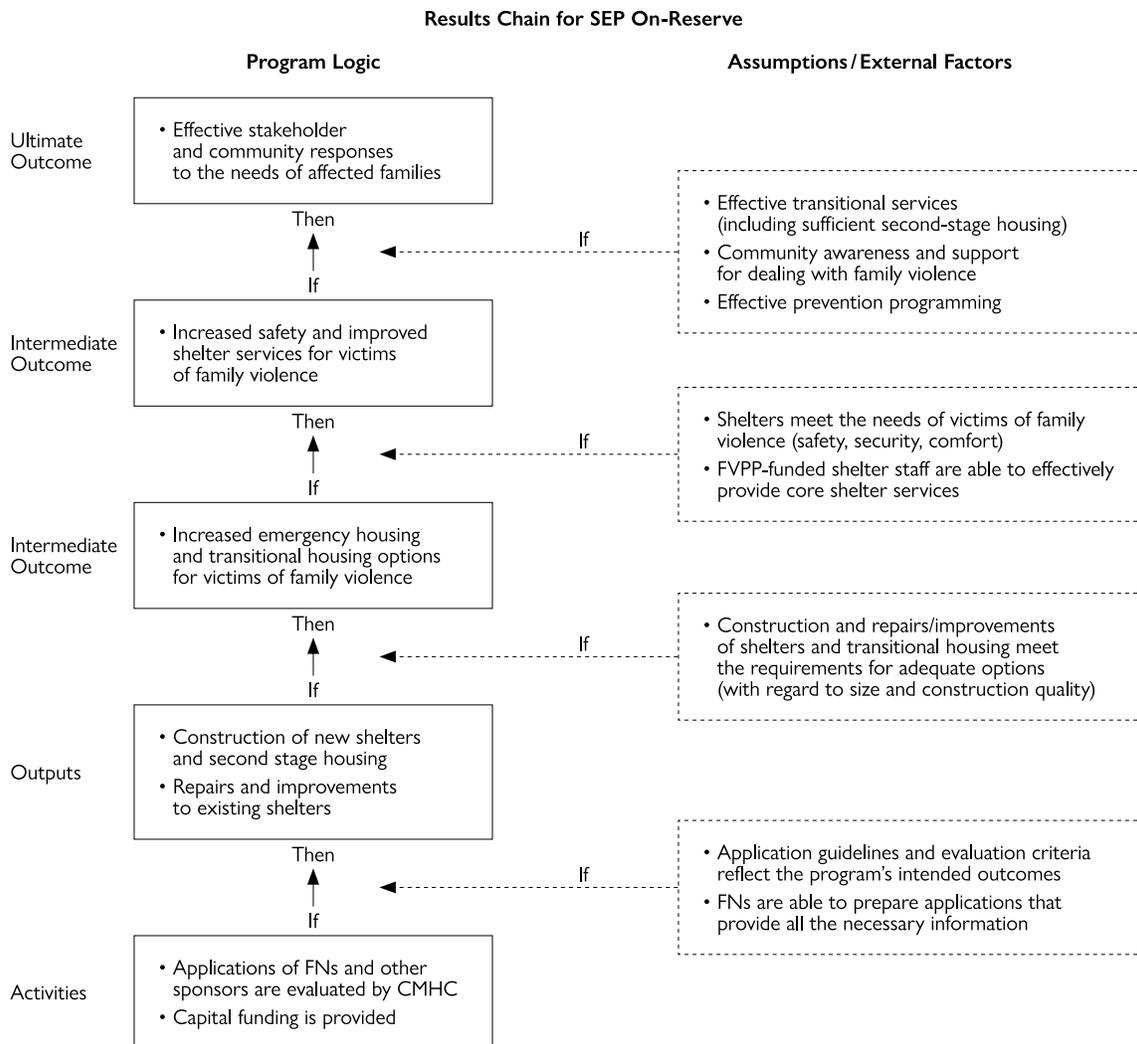
## Appendix A: Key Definitions

<b>Accessibility</b>	As per the SEP guidelines, accessibility refers to Shelters that are located in areas that are reasonably accessible to the on-reserve client population, both in the geographical and physical sense. For physical accessibility, SEP funding guidelines state that special consideration in the selection process will be given to shelters that accommodate occupants for persons with disabilities. For geographical accessibility, shelters must be situated on reserve lands unless exceptional circumstances exist.
<b>Administrative Costs</b>	CMHC’s administrative costs represent the fully allocated operating costs, which includes direct salary & fringe benefits, direct non-personnel costs (i.e., travel, training) allocated IT costs and allocated overhead costs (i.e., Human Resources, Legal, Finance, Communications etc.).
<b>Availability</b>	Having the number of beds/units in emergency shelters or second stage housing on-reserve needed in order to meet the demand for victims fleeing domestic violence.
<b>Bed-Unit/Unit</b>	For a shelter, a unit is a hostel room (where facilities may be shared) and a bed-unit is a bedroom within a shelter. For a second-stage housing, a unit is a self-contained unit (contains cooking, eating, living, sleeping and sanitary facilities).
<b>Building Improvements</b>	These differ from “repairs” in that they are not required to ensure the building meets minimum health and safety building standards. SEP eligible improvements are generally required to improve the living conditions of the occupants such as making rooms wheelchair accessible, adding ramps, adding a new security system, or adding play areas for children.
<b>Domestic Violence</b>	For the purposes of SEP, <i>domestic violence</i> is defined as abusive or threatening behaviour carried out by individuals within the home. This could be between spouses or partners, individuals who share a family or kinship relationship, or un-related persons residing in the same home.
<b>Eligible Repairs</b>	The SEP guidelines define <i>eligible repairs</i> as those required to (a) provide appropriate level of security for the occupants; and (b) to permit accessibility as defined in the CMHC Eligible Modifications for RRAP for Persons with Disabilities; and (c) to provide adequate and safe program and play areas for children.
<b>Mandatory Repair</b>	The SEP guidelines define <i>mandatory repairs</i> as those required for a minimum level of health and safety as defined in the CMHC Rental/Rooming House RRAP Standards. According to these standards, to be eligible, the project must be deficient and require qualifying repairs or lack basic facilities in one of the following categories: a) Structural soundness; b) Electrical System; c) Plumbing system; d) Heating system; e) Fire safety.
<b>Safety</b>	SEP New Construction requires applicants to include, within the proposal, the steps an applicant will take in order to ensure the physical health and safety of shelter residents and the facility.

<b>Safe Home / Safe Home Network</b>	A 'safe home network' is a network of private accommodations (often in rural and remote areas where there is no full-fledged operating shelter or second-stage housing) that provides short-term emergency housing for women fleeing domestic violence. The safe home could be an apartment/townhouse unit, a room in a private residential home, or a hotel/motel room. Each network could have one or more accommodation type.
<b>Second Stage Housing</b>	Per the SEP Guidelines, a second stage (transitional) housing is defined as an extended term, interim housing project typically for those leaving emergency shelters, providing accommodation generally for a period not to exceed one year.
<b>Security</b>	For the purposes of this evaluation the definition of security is used as a general term to depict a shelter space that allows occupants to feel in a state of being "free from danger and threat" while residing in a shelter. SEP New Construction requires applicants to include, within the proposal, the steps an applicant will take in order to ensure the physical health, safety and security of shelter residents and the facility. Further eligible costs under SEP New Construction and SEP Renovation include building security provisions.
<b>Services</b>	For the purpose of this evaluation services refers to the peripheral services a shelter may provide, such as support facilities and counselling services. SEP does not provide support for services. Services provided through the FVPP include; staff salaries and benefits, professional development, board and committee operations, utilities, appliances, furniture and equipment, office supplies and equipment, crisis line, client transportation, prevention activities, training forums, workshops and outreach.
<b>Shelter</b>	Per the SEP Guidelines, a shelter is defined as a project usually containing hostel style living units where occupants can stay for only a short period of time, usually one to three weeks.
<b>Transition Home Survey (THS)</b>	Conducted by Statistics Canada, the collections data and produces statistics on facilities in Canada providing residential services for abused women and their children. The survey is conducted every two years and 2014 is the last year public information is available.
<b>Units</b>	See Bed-unit/Unit
<b>Youth</b>	Individuals aged 16-29.

## Appendix B: Theory of Change

A simplified version of the program logic model along with a results chain is shown below. The results chain illustrates the main assumptions and external factors that need to be taken into consideration when deciding whether the items in each box of the logic model logically lead to the items in the box above. This provides a guide for how to analyze the achievement of outcomes and how to explain the findings.



## Appendix C: Evaluation Matrix

Main indicators	Doc Review	Data Review	Key Informant Interviews
<b>1. Continuing need for the program</b>			
Incidence of family violence in First Nation communities	Yes		Yes
Underlying causes of family violence in First Nation communities	Yes		Yes
Opinions regarding the need for shelters and second-stage housing			Yes
Inspection data regarding shelter conditions	Yes		
Opinions regarding the need for funding for repairs and renovations			Yes
<b>2. Program alignment with federal government and CMHC priorities</b>			
Documented statements of federal priorities that are supportive of SEP	Yes		
Documented statements of CMHC priorities that are supportive of SEP	Yes		
Opinions regarding program alignment with CMHC priorities			Yes
<b>3. Program impact on increased availability and accessibility of shelters</b>			
Number of shelters constructed during the study period	Yes	Yes	
Number of shelter units added during the study period		Yes	
Impact of study period shelters on avg. FN distance to a shelter	Yes		
Opinions regarding the impact of existing shelter on accessibility			Yes
SEP funding for repairs and renovations during the study period		Yes	
% of on-reserve residents that have shelters within certain distances (50km, 100km, 150km)	Yes		
<b>4. Program impact on increased availability and accessibility of second-stage housing</b>			
Number of second stage housing facilities constructed during the study period		Yes	
Number of second-stage housing units added during the study period		Yes	
SEP funding for repairs and renovations during the study period		Yes	
Evidence regarding the need for second-stage housing	Yes		Yes
<b>5. Program impact on the provision of services</b>			
Impact on the provision of safety	Yes		Yes
Success of the shelter in contributing to improved shelter services			Yes
<b>6. Program impact on community response</b>			
Success of the shelter in contributing to improved community response			Yes
Reasons for the shelter's contribution to improved community response			Yes
<b>7. Economy and efficiency of program delivery</b>			
Opinions regarding the efficiency of various aspects of the admin. process			Yes
SEP costs as a % of funds expended		Yes	
<b>8. Economy and efficiency of program design</b>			
Suggestions of interviewees regarding possible alternatives			Yes
Alternative models for addressing domestic violence on reserves	Yes		

## Appendix D: First Nation Communities Interviewed

First Nation	Region	Location Type	Shelter Type
Nipissing First Nation	ON	Rural	Second Stage
Listuguj Mi'gmaq Government	PQ	Rural	Emergency Shelter
Nuxalk First Nation	BC	Remote	Emergency Shelter
Penticton First Nation	BC	Urban	Emergency Shelter
Innu TakuaiKAN Uashat Mak Mani-Uten	PQ	Urban	Emergency Shelter
Soowahlie First Nation	BC	Rural	Second Stage
Walpole Island First Nation	ON	Urban	Second Stage
Tribal Council for Atikamekw	PQ	Rural	Emergency Shelter
Lennox Island First Nation	ATL	Rural	Second Stage
Taa'an Kwachan and the Kwanlin Dun	PTR	Rural	Second Stage
Millbrook First Nation	ATL	Urban	Emergency Shelter
We'koqma'q First Nation	ATL	Rural	Emergency Shelter
Sheshatshiu Innu First Nation	ATL	Rural	Emergency Shelter
Coldwater First Nation	BC	Urban	Emergency Shelter
Naotkamegwaning First Nation	ON	Rural	Emergency Shelter
Mohawks of the Bay of Quinte	ON	Rural	Emergency Shelter
Kitchenuhmaykoosib Inninuwug	ON	Remote	Emergency Shelter
Mathias Colomb Band	PTR	Remote	Emergency Shelter
Micmacs of Gesgapegiag	PQ	Rural	Emergency Shelter
Tahltan	BC	Remote	Emergency Shelter
Mathias Colomb Band	PTR	Remote	Emergency Shelter
Fisher River	PTR	Rural	Emergency Shelter
Stoney First Nation	PTR	Rural	Emergency Shelter
Ermineskin	PTR	Rural	Emergency Shelter
Ross River	PTR	Rural	Second Stage

## Appendix E: Bibliography

- Andersson, Neil et. al., "[Rebuilding from Resilience: Research Framework for a Randomized Controlled Trial of Community-led Interventions to Prevent Domestic Violence in Aboriginal Communities](#)." Pimatisiwin, vol. 8, no. 2, 2010, pp. 61–88.
- Bagshaw, Dale et al. [Reshaping Responses to Domestic to Domestic Violence Final Report](#), University of South Australia, April 2000. Web.
- BC Housing. [Understanding Women's Safe Home Programs in BC](#), June 2011.
- Bolger, Audrey. [Aboriginal Women and Violence](#). Casuarina: Australian National University North Australia Research Unit Darwin, 1991. *Australia National University*. Web.
- Canada. Canada Mortgage and Housing Corporation. [2017 Annual Report](#).
- Canada. Canada Mortgage and Housing Corporation. "[Maintaining Seniors' Independence through Home Adaptations: A Self-Assessment Guide](#)." Web.
- Canada. Canada Mortgage and Housing Corporation. [National Housing Strategy](#). November 2017. Web.
- Canada. Canada Mortgage Housing Corporation. "[New Shelters in Five First Nations Communities](#)." February 20, 2017
- Canada. Canada Mortgage and Housing Corporation. [Shelter Enhancement Program: Evaluation Report](#). Sept. 2009, Web.
- Canada. Canada Mortgage and Housing Corporation. [Summary of the Amended Corporate Plan 2018-2022](#), March 29, 2018. Web.
- Canada. Department of Finance. [Budget 2016: Growing the Middle Class](#). Budget Plan, Mar. 2016. Web.
- Canada. Department of Justice Canada. Research and Statistics Division. [Victimization of Indigenous Women and Girls](#), July 2017. Web.
- Canada. Department of Justice. 10 Principles Respecting the Government of [Canada's Relationship with Indigenous Peoples](#)
- Canada. Indigenous Services Canada. [Guidelines for the Family Violence Prevention Program](#). Web.
- Canada. Indigenous Services Canada. [Evaluation of Shelter Allowance as it Relates to On-Reserve Housing](#), June 2010 (revised Aug. 2011). Web.
- Canada. Indigenous Services Canada. [Evaluation of the Family Violence Prevention Program](#), Feb. 2012. Web.
- Canada. National Collaborating Centre for Aboriginal Health. [Family Violence as a Social Determinant of First Nations, Inuit and Metis Health](#), 2009-2010. Web.
- Canada. National Inquiry into Missing and Murdered Indigenous Women and Girls. Marion Buller et. al. [Interim Report: Our Women and Girls are Sacred](#), 2017. Web.
- Canada. Prime Minister's Office. [Mandate Letters for Cabinet Members](#). Reviewed August 2018.

- Canada. Public Health Agency of Canada. [Aboriginal Women and Family Violence](#), 2012. Web.
- Canada. Public Health Agency of Canada. [Evaluation of the Horizontal Coordination Function of the Family Violence Initiative 2011/12-2016/17](#).
- Canada. Public Health Agency of Canada. Gregory Taylor. [The Chief Public Health Officer's Report on the State of Public Health in Canada 2016: A Focus on Family Violence in Canada](#). Web.
- Canada. Standing Committee on Indigenous and Northern Affairs. [Breaking Point: The Suicide Crisis in Indigenous Communities](#). June 2017. Parliament of Canada. Web.
- Canada. Statistics Canada. Jillian Boyce. "[Victimization of Aboriginal People in Canada, 2014](#)." Juristat, vol. 85, no. 2, June 2016. Web.
- Canada. Statistics Canada. Samuel Perreault. "[Criminal Victimization in Canada, 2014](#)." November 2015.
- Canada. Statistics Canada. "[Shelters for Abused Women in Canada, 2014](#)" Juristat.
- Canada. Statistics Canada. "[Transition Homes in Canada: National, Provincial and Territorial Fact Sheets](#)." Statistics Canada, n.d. Web.
- Canada. Status of Women Canada. [It's Time: Canada's Strategy to Prevent and Address Gender-Based Violence](#). June 2017. Web.
- Canada. Status of Women Canada. "[Action Plan to Address Family Violence and Violent Crimes against Aboriginal Women and Girls](#)." Sept. 2014. Web.
- Carou-Jones, Valeria. "Executive Summary." [Formative Evaluation of the UNFPA Innovation Initiative](#), United Nations Populations Fund Evaluation Office, vol. 1, June 2017.
- Holmes, Cindy and Sarah Hunt. "[Indigenous Communities and Family Violence: Changing the Conversation](#)," National Collaborating Centre for Aboriginal Health, 2017.
- Pan Canadian Voice for Women's Housing: A Symposium. September 14-15, 2017. [Report](#). Web.
- Pan Canadian Voice for Women's Housing: A Symposium. October 24-25. [Report](#). Web.
- Pauktuutit Inuit Women of Canada. [Abuse Prevention: Shelters and Transitional Housing](#), 2018. Web.
- Women's Shelters Canada. [Building a National Narrative: A Select Review of Domestic Violence Policies, Legislation, and Services across Canada](#). September 2018.
- Women's Shelters Canada. [Letter to Minister Duclos](#). September 2017. Web.
- World Health Organization. Alexander Butchart et. al., "[Preventing Intimate Partner and Sexual Violence against Women: Taking Action and Generating Evidence](#)," 2010. Web.
- YWCA. "[Life Beyond Shelter: Toward Coordinated Public Policies for Women's Safety and Violence Prevention](#)." October 2009



[cmhc.ca](http://cmhc.ca)