

# CANADA MORTGAGE AND HOUSING CORPORATION (CMHC) DETAILED ACTION PLAN

to the recommendations of the Audit on Housing in First Nations of the Auditor General

Report Ref. No.	OAG Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Key Interim Milestones (Description/Dates)	Responsible Organization/ Point of Contact (Name, Position, Tel #)	<i>Indicator of Achievement</i> <b>(For Committee Use Only)</b>
24	Indigenous Services Canada and the Canada Mortgage and Housing Corporation, in collaboration with First Nations, should develop and implement a strategy to close the housing gap by 2030 that outlines how they will coordinate their efforts, identifies needs and required funding, and establishes measurable targets for tracking progress.	<p>Canada Mortgage and Housing Corporation agrees with this recommendation.</p> <p>CMHC will continue to work to support the implementation of the <i>National First Nations and Related Infrastructure Strategy</i> and to advance First Nations' self-determined housing needs.</p> <p>In alignment with the United Nations Declaration on the Rights of Indigenous Peoples, CMHC will engage with First Nations partners before committing to any new actions or proposals affecting First Nations partners where they have not already been consulted.</p>	Through the implementation of the National First Nations and Related Infrastructure Strategy, CMHC will support a coordinated approach to addressing the housing gap in First Nations.	March 31, 2027	<p>24.1 In 2024, CMHC will collaborate with key partners to:</p> <p style="padding-left: 20px;">24.1.1 Immediately establish an Assistant Deputy Minister-level committee with Indigenous Services Canada to ensure collaboration and sharing of information, policy response and changes as well as program delivery improvements. (Spring 2024)</p> <p style="padding-left: 20px;">24.1.2 Immediately refresh our Memorandum of Understanding with Indigenous Services Canada establishing channels and best practices for information sharing, policy responses, and program delivery is in the process of being signed. (Spring 2024)</p> <p style="padding-left: 20px;">24.1.4 Establish an internal working group to develop recommendations to improve CMHC program accessibility for all First Nations. (Spring 2024)</p> <p>24.2. By March 31, 2026, CMHC will:</p>	<p>Name: Michel Tremblay</p> <p>Position: Interim President and CEO, Canada Mortgage and Housing Corporation (CMHC)</p> <p>Tel #: 613-748-2836</p>	

					<p>24.2.1 Fund and support research on the ecosystem of relevant funding and policy levers.</p> <p>24.3 By March 31, 2027 CMHC will:</p> <p>24.3.1 Support ISC with engagement on establishing measurable targets and tracking progress as part of the implementation of the National First Nations Housing and Related Infrastructure Strategy.</p>		
28	<p>Indigenous Services Canada and the Canada Mortgage and Housing Corporation should work with First Nations to better understand the extent of mould in housing in First Nations communities and use this information to support First Nations to reduce mould in housing.</p>	<p>Canada Mortgage and Housing Corporation agrees with this recommendation.</p> <p>CMHC recognizes the importance of mould remediation and respects First Nations' management over their housing affairs, including decisions regarding self-determined priorities.</p> <p>CMHC does not have a dedicated program to address mould, but mould remediation is an eligible repair through CMHC's Residential Rehabilitation Assistance Program (RRAP). First Nations can choose to apply to RRAP for mould remediation. CMHC will not dictate which homes a First Nation selects for renovation.</p>	<p>Support for the increased capacity of First Nations in mould assessment and prevention.</p> <p>Increased awareness of CMHC's Residential Rehabilitation Assistance Program (RRAP) for mould remediation.</p>	March 31, 2025	<p>28.1 In Spring 2024, CMHC will:</p> <p>28.1.1 Include First Nations mould as part of the Terms of Reference (TOR) of the newly established Assistant Deputy Minister-level committee and as a standing item on the agenda to be discussed by this committee.</p> <p>28.2 By March 31st, 2025, CMHC will:</p> <p>28.2.1 Engage in dialogue with key partners to support mould assessment and remediation; this will include Indigenous led organizations that can directly support capacity development in First Nation communities. (March 31, 2025)</p> <p>28.2.3 Increase awareness of the RRAP program for mould remediation. (March 31, 2025)</p>	<p>Name: Morley Linstead</p> <p>Position: Director of Indigenous and Northern Housing Solutions (Acting), Canada Mortgage and Housing Corporation (CMHC)</p> <p>Tel #: 709-772-4045</p>	

					28.2.4 Through partnerships with Indigenous organizations, refresh informational materials developed as part of the previous mould strategy and make them readily available to First Nations. (March 31, 2025)	
36	The Canada Mortgage and Housing Corporation should use the most recent census data in its allocation formulas for First Nations housing to ensure regions receive funding that reflects demographic changes in First Nations communities.	Canada Mortgage and Housing Corporation agrees with this recommendation.  CMHC agrees that the allocation formulas need to be updated and that current demographic information is to be included in allocation decisions.	CMHC will use updated census data in our allocation formulas reflective of demographic changes in First Nation communities.	March 31, 2026	36.1 CMHC will:  36.1.1 Review the partnership agreement between CMHC, ISC and AFN which established the national allocation methodology. (Spring 2024)  36.1.2 Engage with key stakeholders to update allocation formulas for CMHC's On-Reserve Residential Rehabilitation Assistance Program (RRAP) and the Section 95 Program and ensure these formulas use the most recent census data. (Spring 2025)  36.1.3 Subject to engagement results, develop an action plan to implement changes to the funding allocation methodology. (Spring 2025)  36.1.4 Request to structure any future agreements to include periodic demographic changes to any allocation formulas on a go-forward basis. (Spring 2025) 36.2 Within the context of this work, CMHC will explore policy options with First Nations on the	Name: Michel Tremblay  Position: Interim President and CEO, Canada Mortgage and Housing Corporation (CMHC)  Tel #: 613-748-2836

					transfer of care and control for on-reserve housing. (March 31, 2026)		
37	<p>Indigenous Services Canada and Canada Mortgage and Housing Corporation should work with First Nations communities with the poorest housing conditions to ensure that they receive the support they need to improve housing conditions.</p>	<p>Canada Mortgage and Housing Corporation partially agrees with this recommendation.</p> <p>CMHC will continue discussions on funding methodologies to support a needs-based approach for regional funding distributions.</p> <p>CMHC and ISC will explore options to coordinate delivery and improve access to programs for First Nations with poor housing conditions.</p>	<p>National funding models for housing in First Nation communities incorporate a needs-based approach. In addition, program access for those that need it most is improved.</p>	December 31, 2025	<p>37.1 CMHC will engage First Nation partners to:</p> <p>37.1.1 Explore the feasibility of expanding a needs-based, First Nation-led approach nationally. (Spring 2025)</p> <p>37.1.2 Develop options with First Nations and their representative organizations that would further weight funding allocations and decisions towards First Nations with the greatest need. (Spring 2025)</p> <p>37.1.3 Consider, with partners, additional approaches to target support to communities with the poorest housing conditions for improved program access. (December 31, 2025)</p> <p>37.1.4 Review CMHC's program policy and processes to continually maximize outcomes and improve access for communities with capacity barriers. (December 31, 2025)</p>	<p>Name: Michel Tremblay</p> <p>Position: Interim President and CEO, Canada Mortgage and Housing Corporation (CMHC)</p> <p>Tel #: 613-748-2836</p>	
44	<p>Indigenous Services Canada and Canada Mortgage and Housing Corporation should, in collaboration with First Nations communities, identify the First</p>	<p>Canada Mortgage and Housing Corporation agrees with this recommendation.</p>	<p>Information sharing between ISC and CMHC results in a coordinated approach in understanding and</p>	December 31, 2025	<p>44.1 In 2024, CMHC will:</p> <p>44.1.1 Through the updated Memorandum of Understanding with ISC, seek to share</p>	<p>Name: Morley Linstead</p> <p>Position:</p>	

	<p>Nations communities most in need of capacity funding and ensure they receive the funding to have sustained capacity to manage housing.</p>	<p>Through CMHC's Indigenous Skills and Training Program (IST), First Nations organizations can apply for funding in support of their capacity development needs to manage housing. As with our other programs, through the application process, First Nations determine the scope of their housing-related needs.</p>	<p>supporting capacity needs related to on-reserve housing management.</p>		<p>information related to capacity and skills training initiatives with the aim of offering complementary capacity development funding;</p> <p>44.2 In 2024, CMHC will:</p> <p>44.2.1 As part of the Assistant Deputy Minister-level committee that is being established, CMHC will include capacity needs and training as part of the terms of reference and as a standing item on the agenda for this committee's consideration.</p> <p>44.3 By December 31st, 2025, CMHC will:</p> <p>44.3.1 Leverage existing data and work with ISC to identify opportunities to coordinate services that target and support those communities in greatest need of capacity development support. (December 31, 2025)</p> <p>44.3.2 work with Indigenous-Led technical services providers to make strategic investments to build capacity in communities to manage housing. (December 31, 2024)</p> <p>44.4 By December 31, 2025, CMHC will:</p> <p>44.4.1 Take an approach informed by reconciliation and will be guided by the goals and</p>	<p>Director of Indigenous and Northern Housing Solutions (Acting), Canada Mortgage and Housing Corporation (CMHC)</p> <p>Tel #: 709-772-4045</p>	
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					actions outlined in the "skills and capacity" section (6.12) in the First Nations National Housing and Related Infrastructure Strategy concerning skills and capacity development for First Nations communities.		
45	Indigenous Services Canada and Canada Mortgage and Housing Corporation, in collaboration with First Nations, should review the structure and delivery of their housing programs to streamline the application process to simplify and facilitate access to funding.	<p><b>Canada Mortgage and Housing Corporation agrees with this recommendation.</b></p> <p>CMHC will continue to review the structure and delivery of our housing programs in collaboration with key partners, with the aim of maximizing funding, reducing administrative burden and aligning with the spirit of reconciliation.</p>	CMHC will conduct a policy review to identify areas for operational improvement and enhanced coordination with ISC.	By 2025	<p>45.1 In 2024, CMHC will:</p> <p>45.1.1 Through the updated and enhanced Memorandum of Understanding and as part of the Assistant Deputy Minister-level committee mandate, collaborate with ISC to align funding where appropriate and seek efficiency and effectiveness in program delivery.</p> <p>45.2 In 2024, CMHC has:</p> <p>45.2.1 Streamlined and merged seven unique Renovation Programs offered on-reserve into one universal program to support efficiency for First Nations.</p> <p>45.3 In 2025 CMHC will:</p> <p>45.3.1 Revise Section 95 policies and guidelines to maximize funding, simplify requirements and align them with First Nation priorities.</p> <p>45.3.2 Simplify the on-line CMHC Portal application process.</p>	<p>Name: Morley Linstead</p> <p>Position: Director of Indigenous and Northern Housing Solutions (Acting), Canada Mortgage and Housing Corporation (CMHC)</p> <p>Tel #: 709-772-4045</p>	

49	<p>Indigenous Services Canada and Canada Mortgage and Housing Corporation should obtain assurance that all federally funded housing in First Nations communities meets the National Building Code of Canada or a stricter code. If building code deficiencies are identified, the department and the corporation should support First Nations to address them.</p>	<p>Canada Mortgage and Housing Corporation agrees with this recommendation.</p> <p>CMHC recognizes that building codes help protect the health and safety of occupants, while assisting with the longevity of built homes. It is important to note that First Nations communities are the authority having jurisdiction over and are responsible for ensuring building code compliance.</p> <p>As noted in this audit report, CMHC has a well-established process for obtaining assurance and written confirmation of code compliance for the Section 95 program. Additionally, CMHC has program parameters and delivery processes using third party inspection service providers that require code compliance for major repairs under the Residential Rehabilitation Assistance Program (RRAP).</p>	<p>CMHC will receive confirmation of building code compliance, specific to applicable repair work undertaken through the RRAP program, in a manner that minimizes the administrative burden to First Nations.</p> <p>Through existing programming, CMHC will continue to support First Nations in capacity development to address building code compliance as part of their portfolio management.</p>	2024	<p>49.1 In 2024, CMHC will:</p> <p>49.1.1 Continue to collect code compliance reports for all new builds under the On-Reserve Non-Profit Housing program.</p> <p>49.2 Beginning in 2024, CMHC will:</p> <p>49.2.1 Through the revised Residential Rehabilitation Assistance program, CMHC will ask First Nations to assure repairs meet the appropriate codes and provide confirmation to CMHC. Additionally, CMHC will engage third-party service providers to inspect a 10% of selected projects to confirm CMHC program requirements are being met.</p> <p>49.3. By June 2024, CMHC will:</p> <p>49.3.1 Engage third-party service providers to produce community needs assessments to identify capacity gaps for renovation projects on-reserve. These assessments will inform a capacity development approach to renovation projects over the next 3 years.</p>	<p>Name: Morley Linstead</p> <p>Position: Director of Indigenous and Northern Housing Solutions (Acting), Canada Mortgage and Housing Corporation (CMHC)</p> <p>Tel #: 709-772-4045</p>	
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