



Just Housing Unrealized: The Canada Housing Benefit in Atlantic Canada

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ABSTRACT *We examine the design and implementation of the Canada Housing Benefit (CHB), which is a rent subsidy provided to low-income tenants and an important part of the National Housing Strategy. Focusing on three Atlantic provinces, we explore to what extent the CHB adheres to just housing, based on the perspectives of stakeholders (n=18) who work with people living in poverty. We find that the CHB fails to provide assistance to many marginalized renters, thus perpetuating their exclusion. The CHB also falls short in providing housing that is affordable and secure, and lacks involvement in decision-making on the part of those with lived experience. Finally, the current state of the rental market, including a lack of units and landlord discrimination, poses significant limitations to its implementation. We conclude that the design of the CHB needs to be overhauled to comply with just housing, but that the housing terrain in which allowances are provided needs to be transformed or just housing will remain unrealized.*

KEYWORDS Canada Housing Benefit; housing allowances; human rights; just housing; rental housing; Atlantic Canada

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Canada is in the midst of an unprecedented housing crisis, with many tenants facing unbearably high housing costs, eviction, and homelessness (Canadian Human Rights Commission, 2023). These experiences are not shared evenly, with women, gender diverse and racialized individuals, Indigenous people, those with disabilities, refugees and seniors disproportionately facing housing

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ISSN: 1911-4788



insecurity (Minister of Housing, Infrastructure and Communities, 2023; Rabiah-Mohammed et al., 2022; Stewart & Cloutier, 2022). Numerous factors are at play which underlie this current situation: a dismantling of the welfare state is one, as are colonialism, racism, and unrestricted market forces which have allowed shelter to become increasingly commodified and tenant protections to remain weak (Bernas et al., 2023; MacDonald, 2023).

At the same time that we find ourselves in the midst of this crisis, new affordable housing investments have been made by different levels of government, with the federal government stepping back into this sphere after a long-time absence (Government of Canada, 2017). Further, not only has Ottawa made new financial commitments to housing, it has passed legislation enshrining housing as a human right (National Housing Strategy Act, 2019) and committed to advancing the progressive realization of a right to adequate housing through new housing initiatives (CMHC-NB, 2020; CMHC-NL, 2020; CMHC-NS, 2020). This commitment has been celebrated by activists and recognized internationally (van den Berg, 2019), but the question remains as to whether new efforts and investments in fact adhere to the principles of just housing, or simply make existing housing struggles more blunt. This is the overarching question that guides our work.

In this research, we specifically ask about the design and implementation of one of the major components of the National Housing Strategy, a housing allowance program called the Canada Housing Benefit (CHB). Focusing on the provinces of New Brunswick, Nova Scotia, and Newfoundland and Labrador, and using the framework of just housing, we explore to what extent the CHB advances tenants' right to housing, based on the experiences and perspectives of stakeholders who work with those facing economic and social exclusion.

Just Housing

Just housing is both a movement and a legal framework (Mironva & Morse, 2019), and is also called "housing justice," "right to housing" and "right to adequate housing" among other terms (Lima, 2021; National Right to Housing Network, 2024; Vilenica et al., 2020). As a movement, it drives the work of often female, gender-diverse, Black and Indigenous-led organizations and activists who fight against the financialization of housing, the lack of land under Indigenous stewardship, disaster capitalism and disinvestment in social housing, among other injustices. One example is the National Indigenous Women's Housing Network (2024), which describes itself as a movement of First Nations, Inuit and Métis Peoples focused on housing security and eliminating homelessness as experienced by Indigenous women and girls, and those who are Two-Spirit and gender-diverse. This Network recently submitted a Human Rights Claim to the Federal Housing Advocate. Internationally, a second example is Moms 4 Housing, a collective comprising of Black mothers living in Oakland, California, who were experiencing housing precarity and

homelessness. This group engaged in direct action by occupying an empty house; their subsequent eviction raised public awareness and led to legislative changes to address the financialization of housing in that city (Ramírez, 2020).

Legally, just housing is rooted in the international recognition that housing is a right. This was first recognized in the *Universal Declaration of Human Rights*, in which housing was identified alongside food, clothing, healthcare and social services as part of a right we all share to an adequate standard of living (United Nations, 1948). It was then included in the *International Covenant on Economic, Cultural and Social Rights* (United Nations, 1966), which stressed that housing must be adequate. This means, in part, that individuals must have security of tenure and be protected against eviction and harassment. Two, also means that basic and supportive amenities and infrastructure must be available, such as water, heat, and sanitation. Three, housing must be affordable. The cost of housing should not take away from the ability to procure other necessities, tenants should be protected against immoderate rent levels or increases, and “steps should be taken by States parties to ensure that the percentage of housing-related costs is, in general, commensurate with income levels” (United Nations Committee on Economic, Cultural and Social Rights [CECSR], 1991, article 8.c). Four, to be adequate, housing must be habitable, ensuring safety and good condition to support health. Five, housing must be accessible, giving marginalized sub-populations priority access to housing; examples identified by the CECSR include people with disabilities and seniors. Location is another component – housing must be proximate to important amenities and employment opportunities, but not to harmful locations such as landfills and industrial sites. Finally, housing must be culturally responsive, which includes how it is designed, the materials used and whether it provides access to relevant and important amenities and services.

Beyond describing specific elements of adequate housing, the CECSR also identifies overarching obligations of government. These include that they develop national housing strategies, that they commit maximum available resources, and that strategies are based on “extensive genuine consultation with, and participation by” those with lived experience and the organizations supporting them (CECSR, 1991, article 12). Monitoring progress and tracking the extent to which there is housing insecurity and homelessness in a region are also required.

Based on the *National Housing Strategy Act*, the federal government has committed to just housing, with federal housing policy now “tak[ing] into account key principles of a human rights-based approach to housing” (National Housing Strategy Act, 2019, section 5.1). The three provinces of focus in this study developed bilateral agreements with the federal government in 2020 under the National Housing Strategy (CMHC-NB, 2020; CMHC-NL, 2020; CMHC-NS, 2020). Agreements include the recognition that regions have distinct housing contexts, needs and priorities, and require the development of

provincial action plans pertaining to NHS initiatives which incorporate a human-rights based approach to housing (CMHC-NB, 2020, section C.2; CMHC-NL, 2020, section C.2; CMHC-NS, 2020, section C.2). These plans must:

Include support for those in greatest need, [and] be consistent with the principles of participation and inclusion; equality and non-discrimination, and will which encompasses [sic] the federal government’s human rights-based approach to housing. In so doing, the Action Plan will complement the federal NHS goal of helping advance the progressive realization of Canada’s obligations in relation to housing under the International Covenant on Economic, Social and Cultural Rights (ICESCR). (CMHC-NB, 2020, section C.2; CMHC-NL, 2020, section C.2; CMHC-NS, 2020, section C.2).

Background and Literature

The CHB, which was implemented in mid-2020, is a portable rental subsidy that is given directly to low-income renters (and in some jurisdictions, low-income homeowners). Given that it is co-designed by the federal government and each province and territory, its specific features (including eligibility requirements, amount provided and program parameters) vary across the country. For example, certain provinces restrict the type of household eligible to participate based on composition (e.g., families), income source (e.g., employment versus government) and the percentage of income an applicant is spending on rent (e.g., 30% or 50% of their income). Regions also vary with respect to how the benefit is calculated (and thus, subsidy depth) and program parameters including whether the assistance provided is time-limited, whether inspections are done of units, and how receipt of the subsidy impacts the recipient’s placement on public housing waitlists, if at all. The objective of the CHB is to “eliminate or significantly reduce housing need” (CMHC-NB, 2020, p. 3; CMHC-NL, 2020, p. 3; CMHC-NS, 2020, p. 3) with housing need defined as a “household whose housing falls below at least one of the standards of affordability, suitability and adequacy, and the household would have to spend at least 30% or more of its before-tax income to access acceptable local housing” (CMHC-NB, 2020, section A.3; CMHC-NL, 2020, section A.3; CMHC-NS, section A.3). For all three provinces included in this study, commitments are made in the bilateral agreement with the federal government to prioritize marginalized households (CMHC-NB, 2020, section B.1.1; CMHC-NL, 2020, section B.1.1; CMHC-NS, 2020, section B.1.1). The CHB is not an entitlement program, and so subsidies are not available to all those in need. As stated earlier, the CHB is one component of the National Housing Strategy, which is rooted in a just housing framework.

Because there is limited research on housing benefits specifically, we expanded our synthesis to include different kinds of rent subsidies, and notably housing vouchers which feature the involvement of an intermediary

(government) which provides the subsidy directly to the landlord. It is noteworthy that although rent subsidies are designed with the primary purpose of making housing more affordable, extant work shows that recipients can still struggle with their housing costs (Berger et al., 2008; Cooper et al., 2020; Dawkins & Jeon, 2017; Flambard, 2019; Haffner & Boumeester, 2014; Leviten-Reid et al., 2024; McClure, 2005). Some of this research unpacks why. In the case of the Housing Choice Voucher (HCV) program in the U.S., recipients must be living in units at, or below, government-set thresholds when they sign their lease. However, this requirement is irregularly implemented, rent can increase during a tenancy, household income may decline due to job changes, or utility costs might be higher than the utility allowance provided, all of which can result in higher shelter cost burdens (Dawkins & Jeon, 2017). In Canada, a subsidy covering 75% of median market rent in a Manitoba-based program leaves recipients with significant shelter burdens given the small number of low-cost units available (Cooper et al., 2020), while caps on rent subsidies in Australia also limit the degree to which housing is affordable for tenants, particularly in higher-cost markets (Blunden & Flanagan, 2022). Despite these findings, rent subsidies contribute to stability. Berger et al. (2008) reported that they were associated with longer tenancies, while Wood et al. (2008) found that households receiving subsidies were less likely to be unsheltered, staying in emergency housing, or co-habiting with family or friends. Similarly, in a more recent study, subsidies were effective in preventing both moves and different forms of homelessness for both Black and white renters given priority access to HCVs (Solari et al., 2021).

An additional theme in the literature concerns tenant “choice” in housing; this is due to the lauded portability of allowances, and the ability of HCV holders to also select their rental units (as long as it complies with program requirements), aspects which are missing from place-based projects such as public housing (OECD, 2022). Research, however, finds that tenants typically have limited housing options even when they are in receipt of rent subsidies, particularly when they are part of equity-deserving groups (Ellen et al., 2019). Looking at the location of HCV recipients across the U.S., McClure et al. (2015) found that only one-fifth of these subsidized tenants lived in low-poverty census tracts, and that fewer Black and Hispanic households receiving vouchers lived in these more affluent neighbourhoods compared to non-Hispanic White recipients. In a second national-level study on HCV households headed by women, Schwartz et al. (2016) similarly reported that recipients, and particularly Hispanic and Black households, were much less likely to be living in lower-poverty neighbourhoods. At play are discrimination (Aliprantis et al., 2022; Hangen & O’Brien, 2023), tenants’ social networks (Ellen et al., 2019), and landlord targeting of voucher recipients when they have units for rent in distressed neighbourhoods for which there is low demand (Rosen, 2020). Finally, lack of choice was also identified in the Australian context, with women who were victims of intimate partner violence sometimes

unable to find housing despite being in receipt of rent subsidies, due to low vacancy rates and discrimination based on family type (Blunden & Flanagan, 2022).

Research Site

This research takes place in three Atlantic Canadian provinces – New Brunswick (NB; population of 775,610), Nova Scotia (NS; 969,383) and Newfoundland and Labrador (NL; 510,550), located in the unceded and ancestral territories of the Mi'kmaq, the Wolastoqiyik and the Peskotomuhkatyik for NB, the Mi'kmaq for NS, and the Inuit, Innu, and the Mi'kmaq for NL. These provinces share similar characteristics: their formal economies are largely resource-dependent, and they have smaller populations compared to central and western Canada. Although these provinces have traditionally experienced out-migration, both pandemic-associated health regulations which limited the spread (and thus risk) of COVID-19, and targeted immigration strategies, have led to recent population growth in NB and NS (Statistics Canada, 2023).

In terms of housing, about one-third of tenants spend 30% or more of their income on shelter (Statistics Canada, 2023), similar to the country as a whole. Region-wide (or even provincial) data are not available on homelessness, but information from local organizations shows that it is both prevalent and increasing. To illustrate, St. John's has 268 individuals experiencing homelessness, with the number of those chronically so doubling between 2022 and 2023 (End Homelessness St. John's, n.d., n.p.). Urban communities in NB report that 812 people are without housing, with a 16% increase in chronic homelessness in 2023 (Saint John Human Development Council, 2023, n.p.). In Halifax, 1,142 are without housing (Affordable Housing Association of Nova Scotia, 2024, n.p.). Disaggregated homelessness data reveal that people who are Indigenous-identifying, from racialized groups and with disabilities are disproportionately housing insecure (Affordable Housing Association of Nova Scotia, 2024).

Methods

Our purpose is to understand whether the Canada Housing Benefit (CHB), which constitutes one of the major emphases of the National Housing Strategy, aligns with just housing as implemented in Atlantic Canada. To avail this, and using a qualitative methodology, we conducted semi-structured interviews with 18 stakeholders working with individuals and families living in poverty. These stakeholders included front-line staff employed by disability, immigrant and refugee, transitional housing, and legal aid organizations, as well as housing support workers, staff involved in regional housing advocacy

initiatives, and a community-engaged housing researcher. Participants were from six different organizations in NL, four organizations in NB, and four in NS. Five serve rural communities, three serve urban ones, and six reflect both rural and urban realities. Participant recruitment began once approval from the principal investigator's Research Ethics Board was obtained.

We used purposeful and snowball sampling (Creswell & Poth, 2018) to recruit participants. At the beginning of our study, we conducted an environmental scan of organizations involved in housing security, poverty reduction, disability services, newcomer services and women's centres, using web searches combined with conversations with sectoral organizations to do so. Organizations were purposefully selected and approached not only to capture services provided to different sub-populations, but to ensure geographic coverage (that is, urban and rural). At the end of interviews, we also asked participants for recommendations on other organizations to approach.

Invitations and consent forms were sent by email. All but three interviews were web based and all participants consented to being recorded. Most interviews were conducted one-on-one but in one case, a group interview was held with multiple staff members from a single organization. Interviews lasted approximately one hour each, and data collection took place between spring and fall of 2023. Participants received a \$25 honorarium.

Although we sent the call for participation in all four Atlantic Canadian provinces, we were unable to engage with participants from Prince Edward Island. In connecting with several organizations located there, we were informed that they did not have experience with the CHB, nor is information available on-line on the administration of the allowance in that province.

Once interviews were conducted, automated transcriptions were reviewed and corrected. This step was followed by the analysis of each transcript using a thematic approach (Braun & Clarke, 2012). The first step involved coding transcripts, and then reviewing the codes to create specific sub-themes and then themes (Creswell & Creswell, 2017). Our approach to coding was both deductive and inductive; we used components of just housing, such as affordability and security of tenure, to guide our analysis, but also coded data that did not directly fit with this framework to incorporate all salient interview data in our findings (Azungah, 2018). Validity was enhanced by having two members of the research team read and re-read transcripts, review codes, and discuss sub-themes and themes. We also ensured validity by reporting discrepant data, by being reflexive, and by reviewing and revising the interview questions as a research team to bring forth in-depth experiences with the CHB and broader housing and homelessness-related conditions (Cho & Trent, 2006).

Findings

Leaving Tenants Out

Stakeholders we interviewed noted important limitations with the CHB, which impacted the extent to which it assisted sub-groups of marginalized renters. Who these marginalized renters were, and how they were impacted, varied based on jurisdiction given differences in how the allowance is designed in each place, but interviewees in all provinces consistently identified renters who were either left out entirely of the opportunity to receive the CHB, or who did not receive the level of financial support needed based on uneven burdens experienced.

Renters with disabilities were one such group. People with disabilities were considered largely excluded from receiving the benefit in NB in particular, due to the unusual requirement for applicants to have employment income, thus leaving out those unable to work. A minimum earned income threshold of \$12,500 was also in place, meaning those working on a more limited basis were not eligible. Participants explained that people with disabilities were thus largely left to rely on income assistance rather than being able to draw upon the CHB to help them pay rent, which resulted in receiving monthly support that fell far short of the cost of market-based housing, let alone other basic needs. The ineligibility of so many of those with disabilities in NB, combined with low levels of social assistance, symbolized for one participant that “if you have a mental health concern, if you have a disability, if you cannot work, [the message is] you deserve to be poor.”

Participants observed that higher housing costs, disproportionately faced by tenants with disabilities, were also not factored into the CHB. Although calculated somewhat differently depending on province, the amount provided to applicants is based on household size (i.e., the number of bedrooms required), income, average market rent (AMR), and region. However, stakeholders reported that the CHB amount does not adequately consider whether recipients need units that are accessible, which have higher rents. Changes to the calculation of the CHB were reported to be urgently required to “take into account the additional cost of disability” for those receiving the allowance.

Seniors were also noted to be disproportionately and negatively impacted by the design of the CHB. In NB, its first iteration was specifically targeted not only to employed renters, but families, while a revised version now allows single employed individuals to apply. Still, they must be younger than age 65. Meanwhile, NS made differing calculations based on age during the first three years of the CHB, with the benefit bridging the gap between 30% of income and AMR for applicants with employment income under the age of 58, but only 30% of income and 95% of AMR for those 58 or older. At the same time, older renters were described as facing increasing housing insecurity, with one participant reporting that “more and more seniors are struggling with

affordable housing, and are being reevicted [evicted due to extensive renovations, typically done purposefully].”

The circumstances of women escaping intimate partner violence were also mentioned by stakeholders in all three provinces as being overlooked through CHB design. In NB, this once again played out through the requirement to have employment income, but as one participant working for a transitional housing provider explained:

A lot of our women who come to us... are unable to work. Their partner would not allow them to work, so when they left, they had no financial stability or anything. So a lot of them have turned to income assistance... And somewhere down the line, maybe they will be [able to work]. But right now, they could use the help and they're not able to apply for that.

In NS, although employment income is not required, having a source of income is (e.g., income assistance). Meanwhile, securing income was described as posing challenges for women escaping violence and who needed immediate help in paying their rent, for reasons including inability to provide required documentation to government.

Access on the part of refugee claimants was also restricted. Stakeholders in NS in particular described that applicants were deemed ineligible when they lacked either permanent residency or citizenship, and further, that this requirement was poorly communicated. It was also inconsistently applied; one participant provided an example of an individual without citizenship or permanent residency who was accepted for the CHB until program administrators realized that the tenant was not from Ukraine and the support was withdrawn. Additionally, it was stated that all household members were required to be either permanent residents or Canadian citizens for them to receive the CHB, the consequence of which was described as follows: “you’re leaving those permanent residents, who happen to be living with someone who isn’t the status that you require, in insecurity.”

A final group identified as being left out of assistance was broader and focused on those living in poverty who were not able to receive the CHB despite need. In NL, a maximum income eligibility threshold of \$32,500 (which increased to \$65,000 in remote locations of Labrador) was considered too low given the high cost of market rentals inhabited by the working poor in rural parts of the province, combined with their high cost of living. Rejecting applications from people not in shelters or not living in motels, which stakeholders noted as having occurred especially in the early implementation of the CHB in NL, also meant those who were precariously housed and at risk of eviction were being declined. In NS, changes made to the CHB in early 2023 limited support to tenants paying at least 50% of their income on rent, versus 30% when the program began in 2020.

Overall, those we interviewed conveyed that the design of the CHB did not do well in accommodating many individuals and families living in poverty and

experiencing housing insecurity, and failed to assist those who faced numerous barriers to social and economic inclusion and whose situations could have been made easier by receiving the allowance. One participant who works with individuals with disabilities concluded that “you have these benefits, but the criteria are not designed to meet the real needs of people.” Similarly, another participant reflected that “it doesn’t take into consideration the circumstances of people’s lives.” Interviewees from all provinces commented that limiting the number of households supported through the CHB was problematic, noting that an entitlement program with broader eligibility would ensure that those in need would not be left out: “anybody in core housing need should be approved.”

Untenable Affordability

Stakeholders indicated that some of the people who used their services benefited from the CHB. In the context of low wages and meager social assistance rates, even small amounts of cash assistance were described as “helpful,” providing tenants with an opportunity to help make rent. One stakeholder interviewed from NS told us a story of an individual to whom they provided support who started to cry with relief upon hearing the news that they were approved for the subsidy. A staff member from an organization in NL remarked that “this benefit has been life changing for some people.”

However, stakeholders identified problems with the way the CHB was calculated, which hindered its impact on attaining housing affordability, versus merely lowering shelter costs. Participants from NS and NL explained that the allowance’s inability to make housing affordable lay in the government’s use of an upper limit on rent, meaning that tenants living in higher-cost housing were responsible for paying any amount over this limit on their own. Yet as one interviewee stated, “there is a cap, but unfortunately, landlords don’t have a cap.” Based on average market rent (AMR) as derived through rental market surveys conducted by Canada Mortgage and Housing Corporation (CMHC), it was additionally shared that rents reported by CMHC can quickly fall out of date and that averages were based on both occupied and vacant units, thereby underestimating the higher cost of vacant units on the market not subject to rent regulation.

The calculation was also problematic with respect to affordability given that amounts provided varied based on geographic region within provinces, sometimes including more central and peripheral parts of single municipalities. However, interviewees reported that rent differentials were rarely experienced by those who used their services. For example, one person shared that she supported two tenants who had identical incomes and rents but lived in distinct communities about 10 kilometres apart and with different AMRs, with one, therefore, receiving a more generous CHB than the other. Meanwhile, those in more remote communities with lower AMRs also had added costs related to

“getting the resources that they need in order to live,” including higher food prices and needing to drive large distances to access services.

Finally, as several participants also pointed out, having CHB recipients assume responsibility for housing costs above the amount used in government calculations not only meant they were still spending more than they should be on rent, but that the depth of assistance provided was significantly different from rent-geared to income (RGI) housing, in which tenants pay between 25% and 30% of household income of rent, depending on province. As one stakeholder noted in the context of their jurisdiction “a Newfoundland Housing unit is...the cheapest unit you are going to get.”

Security of Tenure

Security of tenure was raised by several stakeholders in all provinces, with one specific theme focused on time limits. This was experienced most dramatically in NB, where recipients are allowed to receive the benefit for a maximum of three years. At that point, the province “expect(s) the increase in earned income will replace the CHB-NB” (CMHC-NB, 2023, p. 5). This was deemed quite problematic by stakeholders in that recipients may simply not be able to become self-sufficient over that period of time. As a representative from a women’s organization stated:

I think if they had extended it to at least five years, that would definitely be more of a benefit to these women... It gives them a little bit more time to get settled, get in a better position, figure out their finances a little bit better.”

Another stakeholder in that province said:

A system that really made meaningful change, and engaged in assisting people with their lives, would not be time-limited at all... you should be receiving this benefit until your income is too high for you to qualify for it.

Time limits to assistance were not in place NS or NL. Still, participants in both provinces observed that their bilateral agreements were in place until 2028, which led them to ask what would be available to help recipients pay their rent in four years’ time. This was described as “concerning” and causing “uncertainty” for tenants. Meanwhile, public housing was considered to provide greater security of tenure for renters with low incomes. As one participant noted:

The best scenario for anyone is to get a call for a Newfoundland Housing unit, a subsidized unit, because that is a permanent thing you’re going to keep. That subsidy is going to be permanent no matter what. It’s not going to change and you don’t have to worry about losing it, or a certain time frame, or anything like that.

Engagement of Lived Experts

Some positive aspects of CHB administration were identified during interviews. Specifically, the CHB was considered by some interviewees not to be stigmatizing, compared to the administration of income assistance. Participants also observed some positive changes over the CHB's lifetime, including expanded eligibility beyond families in NB, and allowing recipients to add their names to the public housing waitlist in NS, which was disallowed during the first years of the program in that province. However, overall, stakeholders considered the design of the allowance and its administration to be top-down, failing to consider, involve and be adaptive to the unique circumstances of those with lived experience of housing insecurity and the staff who support them.

Some stakeholders described a lack of communication regarding significant changes to the allowance program; this included an earlier version of the CHB in NS that provided assistance to applicants based on the month they submitted their request, versus the current practice of starting payments the month after the application is submitted. Similarly, the decision to restrict eligibility to those paying at least 50% of income on rent appeared via a modified application form posted on the government's website; one stakeholder shared with much discouragement that "we just realized [the change] when we printed out new forms. There wasn't an announcement about it, we weren't sent a notice or anything." Lack of clear communication about eligibility was also described in relation to residency status, in particular, with one participant describing numerous unsuccessful attempts to obtain clarity from different government departments.

Interviewees in all provinces reported a lack of flexibility in the CHB as well, which impacted its ability to be helpful and which was rooted in a lack of engagement with lived experts. Part of this inflexibility concerned how the CHB was unresponsive to different place-based contexts; for example, staff with whom we spoke from NL noted that the CHB seemed designed to assist those living in the provincial capital versus smaller communities, a problem which played out in the prioritization of those in shelters versus those who were more likely to be housed, but precariously so, in smaller communities. The paperwork required to apply for the CHB in NL was also a barrier for those in rural parts of the province, given the lack of social workers and housing support staff in those regions. Interviewees from all provinces decried the lower benefit calculations used in rural centres, which they felt were not reflective of the on-the-ground knowledge about the cost of housing in those communities.

Stakeholders also consistently shared that the design of the CHB was too rigid to assist many who are housing insecure. Beyond issues reported earlier with eligibility requirements, housing security and the use of allowance calculations which do not reflect actual housing costs, examples were numerous. These included not being able to use CHB funds to help cover damage deposits necessary to secure a lease, lack of additional support for

utilities when not included in rent, not recognizing that tenants may have to rent larger units given limited availability of smaller units (but still basing the amount of CHB support on household size), imposing two-month time limits to secure housing despite low vacancy rates, and requiring documentation (such as social insurance numbers and tax statements) which tenants may not be able to provide. Participants repeatedly stressed the need to root the CHB in lived experience. As one individual concluded, “government needs to talk to tenants.” Another participant shared:

Tenants need to be spoken to about what their needs are... the voices that are really, really valuable are the ones who are going through this every day. There are hundreds of front-line staff and tenants who can tell you exactly what’s happening with the CHB on the ground and the needs that come from it, and collaborating with those people, in all provinces and all areas, is so important.

Mismatch with the Market

As much as the CHB was discussed during interviews, conversations were replete with observations about the housing market and how the CHB was mismatched with the housing contexts in which tenants found themselves. One of the major concerns was a sheer lack of rental housing in both urban and rural communities, something that interviewees indicated had heightened due to short-term rentals, in-migration, and resource-based projects in rural areas. Vacancy rates in many communities were reported at approximately one percent. Circumstances were especially dire for tenants with disabilities, who could not find any housing to rent that accommodated their needs. As one stakeholder stated, “in this region, there is no accessible housing... accessible housing does not exist.”

High and “skyrocketing” rents were another concern; while NB and NS have annual limits on rent increases (temporarily set at five percent in NS, and based on what is charged for comparable units in a tenant’s neighbourhood alongside the inflation rate in NB), these do not apply to vacated units and still posed significant costs for low-income tenants. NL, in turn, has no such limits. With expressions of disbelief, participants described current, untenable rents across Atlantic Canada, including in small cities and towns like Corner Brook, NL, and Port Hastings, NS. They also described how new construction did not include affordable units for low-income tenants. Many reflected upon how dramatically the housing market had changed in the last four years; for example, someone from NS described that the number of people experiencing homelessness in their city rose more than fourfold between 2019 and 2023, while an interviewee working in NB described with shock how a vacant lot near their office had become an encampment. As one individual from that province stated, “I don’t think any of this was quite anticipated when the government designed this benefit. Three years ago, at least in NB and probably

in other Atlantic areas as well, we had relatively affordable housing compared to other places.” Overall, stakeholders communicated that the CHB was simply not up to the task of responding to the rapidly deteriorating housing situation in Atlantic Canada.

Discrimination was a third issue. Stakeholders reported experiences dealing with landlords disinterested in renting to those receiving income assistance, who were non-senior, who were Indigenous or who were known in their community for substance use. A lack of tenant protections was yet another, with increased cases of renovations, and landlords seeking new paths to eviction, such as by focusing on tenant behaviour and introducing new rules about pets. As one participant from NL shared, a landlord in their community had begun “handing out eviction orders like Christmas cards” in the multiple buildings they owned. Another participant working for a legal aid clinic said that they had currently stopped taking on new clients due to such high demand, and that tenancy issues were by far their most common type of case.

Finally, social housing and supportive infrastructure were described as severely lacking. Stakeholders from all regions noted that public housing waitlists in their communities were so long it could take tenants years to access a unit, and that there was both a dearth of investment in new social housing stock and that public units were sitting empty because they needed repair. Shelters were also lacking, as was transitional housing. Beyond bricks and mortar, several participants, especially those from rural areas, identified a lack of services to support tenants with different and complex needs, and limited access to legal aid in their communities.

Given these significant problems with the housing sector, almost everyone interviewed observed that the CHB could not be implemented effectively. In other words, the CHB was not helpful if tenants could not find homes to rent, if landlords were disinclined to offer lease agreements due to age, ethnicity, or income source, or if tenants were evicted. Further, rental increases meant that tenants continuously struggled with housing affordability. Interviewees described their work as constantly “fighting,” repeatedly being “in a battle,” and always “having to advocate,” and that tenants faced “barriers upon barriers” rather than achieving housing security. Participants in all provinces noted that they had been “very hopeful” or “encouraged” when they first learned about the CHB, but that there were too many problems which limited its effectiveness. They commonly remarked that in light of challenges with the housing market, the CHB was not a good fit, and what was required in order to meaningfully assist tenants and ensure housing security was significant government investment in new social housing stock. Overall, data reveal that the CHB simply did not meet expectations, and that there is a need for more direct government intervention in housing.

Discussion

Our findings show that the CHB program, as it has been implemented in three Atlantic provinces, fails to adhere to principles of just housing, including not prioritizing many renters in greatest need, not ensuring housing is affordable despite receipt of the CHB, failing to provide security of tenure, and not engaging those living in poverty or the front-line organizations supporting them.

While details of program design vary from one province to the other, rather than advancing just housing the CHB can be squarely situated in a residual approach to social welfare characterized by offering a limited and temporary response to the needs of those living in situations of housing insecurity. In the case of the original design in NB, in particular, this is illustrated by a quasi-obsession with targeting the benefit to a narrow cross-section of the population at risk during the current housing crisis. This targeting of benefits is often justified by conservative politicians as a cautious use of the public purse that ensures that no opportunity for drawing upon multiple means of financial support can occur. This residual approach, particularly in the case of NB, has produced a program with almost surreal restrictions on eligibility. The CHB in these Atlantic provinces claims to be part of a response to the housing crisis while not serving (depending on jurisdiction) people with disabilities, seniors living with fixed-incomes during an inflationary period, women who have experienced intimate partner violence, those without permanent residency or citizenship, and at one point individuals living alone, when we know that these household types are over-represented among people living in poverty and are more likely to experience housing challenges (Minister of Housing, Infrastructure and Communities, 2023). Not only was this unexpected given the extent to which people with disabilities, women, seniors and refugees are known to disproportionately experience poverty and housing insecurity, but the fact that eligibility differs depending on jurisdiction means tenants in need face uneven geographies of housing assistance. Beyond the urgent redesign necessary to comply with just housing, stronger federal leadership is required to ensure greater uniformity of access across jurisdictions, as is better coordination with provinces (Deng et al., 2023).

The financial support provided through the program also fails to ensure that recipients achieve housing affordability, which means allocating less than 30% of household income on shelter (CMHC, 2018). While this finding is consistent with other research on rent subsidies, which reports that recipients often end up paying more than they should for their housing (Cooper et al., 2020; Dawkins & Jeon, 2017; Leviten-Reid et al., 2024; McClure, 2005;), it is entirely *inconsistent* with the CECSR (1991). Beyond problems with CHB maxima, lack of permanent rent regulation in two provinces and the lack of vacancy control in all three (in which rent increases are tied to units rather than tenants) also impacts the CHB's ability to ensure housing affordability, as this

puts upward pressure on rents which the housing allowance does not capture well. As a result, the burden of rent increases falls primarily on the shoulders of those living in poverty. Provinces, which are jurisdictionally responsible for tenant protections, need to use a just housing lens not only to re-think the CHB, but other housing legislation and regulations that interact with it in important ways. It is also important to consider comments made by research participants on the acceleration of the housing crisis in Atlantic Canada, and consider whether we would have had different results to report had the research taken place four years ago when the CHB was launched. This also speaks to the need for the CHB to not only be overhauled to ensure just housing, but to be responsive to changing rental markets as has occurred both rapidly and dramatically in Atlantic Canada, wherein vacancy rates have plummeted and rental costs have risen sharply. Of course, to address the deep poverty faced by the households assisted by the organizations we interviewed, other, non-housing related interventions are also needed, including higher minimum wage rates, and more generous income assistance and disability benefits.

Security of tenure is also lacking in the CHB via the use of end dates, particularly in the case of NB which restricts participation for a period of three years, although tenants living in other provinces now only have the certainty of four more years of support given the expiry of agreements in 2028. This restrictive feature of the CHB and the resulting uneasiness faced by tenants is incongruous with the rent subsidy mechanism, since one of the clearest outcomes with respect to available research is that rent subsidies contribute to housing stability (Solari et al., 2021; Wood et al., 2008). This also calls into question what will happen when the National Housing Strategy in its entirety reaches its 10-year end in 2028.

Finally, despite the CECSR's (1991) insistence that government-based housing interventions feature meaningful and extensive stakeholder participation, implementation and administration of the allowance lack involvement and responsiveness to the circumstances of people with lived experience of housing insecurity, as well as the knowledge of staff in front-line organizations. This is inauspicious given that those we interviewed offered ready solutions to the design-related problems they identified, which would also more closely align the CHB to just housing. These are: transform the CHB into a social benefit for all those tenants with low (and no) incomes, regardless of source and irrespective of participant background; adjust allowance calculations to ensure recipients pay less than 30% of their income on housing; base assistance on recipients' ability to pay for their housing versus artificially-imposed end dates; introduce flexibility for those whose circumstances do not adhere to program design; and involve people with lived experience of housing insecurity in its oversight.

Importantly, findings also reveal that a housing allowance program in the Canadian context cannot achieve just housing if the system in which it is provided perpetuates housing hardship and the economic and social marginalization of certain groups, which has surely been exacerbated by the

rapid deterioration of housing markets in Atlantic Canadian communities, to include low vacancy rates. Examples from our study include landlord discrimination that shuts out opportunities for shelter completely based on “undesirable” tenant characteristics, lack of accessible housing for those with disabilities, and lack of lower-cost housing being built through the private market. And although the CECSR (1991) is agnostic on the role of different housing sectors (i.e., private market developers versus non-market) and does not point out the contradictions of just housing in the context of a neoliberal capitalist system, participants in this research effectively did, consistently offering that an expanded social housing sector was needed to offer opportunities to those who have doors closed on them, and to provide deeply affordable, accessible, and stable housing. Their opinions in this regard are in fact consistent with much of the available research on this topic, which shows that tenants have lower rent burdens in social housing compared to subsidized market rentals (Berger et al., 2008; Morris, 2009), and that community-based housing providers charge lower rents and have stronger social orientations than for-profit ones (Auditor General of Canada, 2022; Leachman, 1997; Leviten-Reid et al., 2019).

Limitations

While the study has highlighted some of the limitations and challenges of the CHB in three Atlantic provinces, it also has its own set of constraints. First, our inability to connect with stakeholders in PEI prevents us from having a comprehensive understanding of how the benefit is working in all provinces of Atlantic Canada. Second, although the study aims to understand the experiences of applicants and recipients of the benefit through housing stakeholders and community organizations assisting them, the study is unable to directly capture the experiences of those who navigate the application process on their own. Thus, while the findings offer valuable insights on the CHB, it may not fully represent all experiences related to the benefit.

Conclusion

Overall, and despite Canada’s recent adoption of a rights-based framework for housing and the introduction of the National Housing Strategy, the CHB fails to comply with just housing, and even reinforces existing hardship. The CHB does have redeeming features such as portability and non-stigmatisation, yet the picture that has emerged is that of an overly targeted benefit that, paradoxically, seems to almost miss the mark completely. Not only are modifications required to the program itself, but stakeholders noted its incompatibility with the current state of the rental market in Atlantic Canada.

Those we interviewed consistently identified, in keeping with the CECSR, that front-line agencies and tenants must be involved in the re-design of the CHB and that it must be responsive to lived experience. In addition to shedding light on the weak adherence to just housing principles, then, this research supports and amplifies this call for stakeholder involvement, even if public authorities should have engaged them in the first place. Key next steps are organizing and advocacy on the part of tenants' associations and front-line organizations, both to ensure dramatic and urgent changes to the CHB and new investments in social housing.

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