

The Power of Place: Living Spaces, Thriving Lives

**A Policy Proposal to Modernise Mortgage Policy in
Canada to Expand Housing Options for People with
Intellectual and Developmental Disabilities**



Executive Summary

Place matters. The homes we live in shape our daily lives, our relationships, and our sense of belonging.

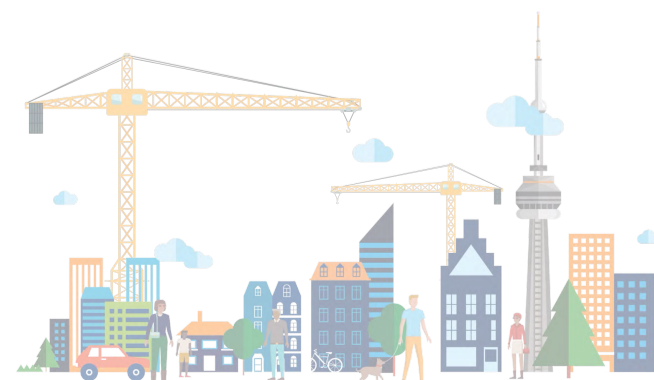
Yet for too many Canadians, a place to call home remains out of reach. It is no secret that Canada is currently facing a severe and escalating housing crisis. Prices and rents have risen dramatically in recent years, far outpacing income growth, whilst housing supply has failed to keep up with demand in both urban and suburban areas. This has led to record-high levels of housing insecurity and long and growing waitlists for affordable housing. In addition, the crisis disproportionately impacts underserved populations including low-income families, seniors,

newcomers, and those with intellectual and developmental disabilities (IDD). Data indicates that across Canada, **6% of households are in core housing need**¹ yet the burden is not evenly shared. People with disabilities, including developmental disabilities, are at **11%, nearly twice as likely** than the general population to experience core housing need² and represent **over 40% of renters in core housing need**³. Waitlists for supportive housing in Ontario number in the tens of thousands⁴. Many individuals with IDD remain in congregate or institutional settings, or live with aging caregivers, limiting opportunities for independence and true community inclusion. In addition, traditional group homes, whilst meeting immediate care needs, are increasingly being seen as an outdated model; not everyone wishes to live in them, and some view them as small-scale institutional settings. There is a growing consensus that housing should be inclusive, integrated, and embedded within broader communities.

To help address Canada's broader housing crisis, the Government of Canada has recently launched **Build Canada Homes** to significantly scale up affordable housing construction across Canada⁵. This marks the start of a significant transformation in Canada's national approach to housing and serves as a key pillar of the federal government's strategy to reduce the housing shortage, improve affordability, and combat homelessness.

However, addressing this crisis requires not only expanding the supply of housing but also ensuring there is innovation in how housing is provided, that housing is accessible inclusive, and supportive of diverse community needs.

Even as the federal government has begun to modernise its approach to housing, technical rules governing federally backed mortgage insurance requirements administered through **Canada Mortgage and Housing Corporation (CMHC)** effectively prevent a single insured mortgage covering multiple, non-adjointing condominium units within a condominium⁶. This creates a critical gap for organisations seeking all alternatives to deliver inclusive housing models, limiting their ability to participate in mixed-use developments, and reinforcing patterns of isolation and segregation that federal policy otherwise seeks to dismantle.



Community Living Toronto (CLTO), one of Canada's leading disability support organisations serving people with IDD, has long championed inclusive housing solutions.

Drawing on decades of experience, CLTO has advanced the concept of **Inclusive Vertical Communities**: mixed-use residential developments in which people with IDD live alongside seniors, students, families, and other community members in condo buildings within vibrant urban centres. This model demonstrates strong social and economic outcomes throughout the building, fostering better mental health and wellbeing, a sense of belonging and reducing isolation and dependency on family members.

We have so far done **7 of these projects** which currently houses **170 people across 114 apartments** with great results, and more in development. When the projects in development are completed by 2029, this will increase to **208 people supported across 136 apartments**.

It shows how the right housing, paired with flexible supports, enables people to thrive as active members of their neighbourhoods. Individuals who once lived in group home settings are now successfully building independent living skills in their own apartments, with support tailored to their needs and goals. Developments like **Mirvish Village**, a vibrant, accessible, mixed-use rental community at Bloor and Bathurst in Toronto, shows how inclusive design fosters independence while maintaining connection. People supported by Community Living Toronto live across multiple suites within the same building, supported by a staff hub in the building, which allows familiar relationships to continue, new friendships to form, and a strong sense of belonging to take root. These communities enhance independence, increase community engagement, and create environments where people feel pride in their homes and confidence in their futures.

Although the CMHC has been supportive of these types of development projects, providing seed funding through grants and other levels of support, its current mortgage rules generally treat each condo unit as a separate transaction, unless a provider owns an entire building or, in some cases, an entire floor within a building. However, for housing intended to support people with IDD, this creates a profound and unintended consequence. Requiring ownership of a full building or a single floor effectively recreates segregated, institutional patterns of living, inclusionary in appearance, but exclusionary in effect. It risks designating entire floors for "those people," undermining decades of progress toward truly integrated community-based living. In addition, there are often limited to no alternatives for additional funding streams that not-for-profits can tap into. This approach creates inefficiencies, higher costs, it leaves existing not-for-profit resources and leverage untapped and severely limits the scalability of these types of inclusive housing models.

This Green Paper* proposes policy to address these barriers: the creation of a **single-mortgage, multi-condo unit financing model** or **consolidated mortgage structure** that would enable community housing organisations to purchase multiple units within the same condo building under one mortgage. There are equivalent CMHC financing mechanisms already in place for large scale rentals. These condo units would be scattered, "checkerboard" style throughout a condo building, so units for people with IDD are integrated seamlessly across floors, creating a true community mosaic.



I like it here. It is a nice bachelor apartment where I can be independent and have time to be by myself. I can't wait for the weightroom and rooftop pool to open.
- Jonathan, Mirvish Village Resident



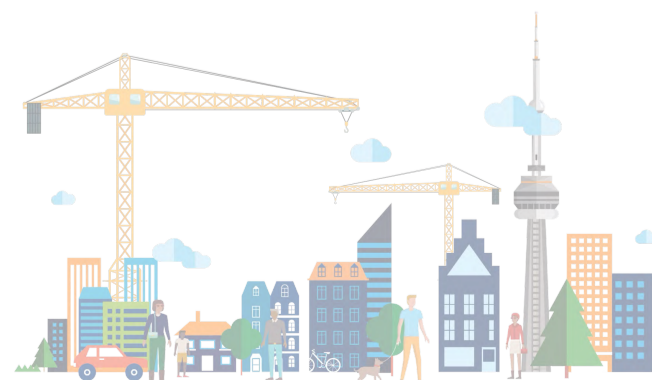
Someone said "No, I cannot live on my own," and I said I can and I am going to. And look at me here, now.
- Brenda, Birchmount Green Resident



I didn't have my own home. Then I was couch surfing for about 3 years till Glen (APS worker) got me in here. Glen and my support workers have been very helpful. They helped me with a lot of things.. to get my furniture, to get all set up, and they've been very great to me.

I take care of my own finances. I do my own laundry. I do my own cooking. ... I keep my place clean and tidy. I like living by myself.
- Judy, St Hilda's Resident

*Unlike a White Paper, which sets out a firm, official set of Government policy positions, a Green Paper is a document that outlines tentative policy proposals, ideas, or options to stimulate debate, spark discussion, and look at potential policy changes. Used across Westminster Style Parliamentary Democracies, as well as the European Commission, the term derives from traditionally being printed on green paper to distinguish them from finalised government white papers.



This model would support genuine inclusion, provide stable, truly integrated housing; reduce administrative and financial fragmentation and allow community housing providers, such as CLTO, to partner more effectively and efficiently with private and mixed-use condo developers.

By taking advantage of the rapidly changing housing policy landscape, especially through the newly established *Build Canada Homes*, the federal government has a unique opportunity to embed this model into its housing strategies moving forward. This discussion document outlines current barriers, an international scan, possible policy options and recommendations.



1. Introduction

1.1 Purpose of This Green Paper

The proposals set out in this Green Paper are exploratory in nature. They are intended to spark a policy conversation. It offers a proposal for a **single-mortgage, multi-condominium unit financing model**. It lays out ideas, benefits, risks, and recommendations, with the goal of informing federal housing policy development, especially as Canada embarks on a new era of large scale, affordable housing through Build Canada Homes.

Through this Green Paper, Community Living Toronto is asking: How can federally backed housing adapt to support modern, truly inclusive, long-term community housing in vertical, urban forms? How can not-for-profit organisations benefit from the proposed reforms to help them deliver stable and integrated homes for people who need them most? How can the resources, capital and creativity of not-for-profits, be unlocked to maximise impact and help address the problem?

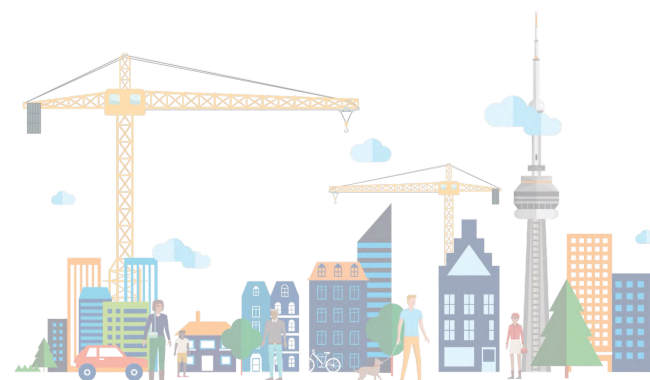
This paper is meant to support informed federal decision-making on potential modifications to Canada's mortgage insurance framework. Whilst this will be shared with provincial and municipal governments, developmental service sector organisations, and housing partners, its primary audience is the Government of Canada, particularly The Ministry of Housing, Communities and Infrastructure, *Build Canada Homes* and the CMHC.



1.2 About Community Living Toronto

Since 1948, Community Living Toronto has provided supports for children, youth, and adults with intellectual disabilities across Toronto. Our mission is to foster inclusive communities by supporting the rights and choices of people with an intellectual disability and we are committed to our vision of a society where everyone belongs and is valued.

Our services consist of a wide range of options including group homes, supported independent living, respite for families, employment supports, and community-based activities. In Toronto alone, we provide support to over **4,000 individuals** and their families in over **50 locations**.



Over the past 12 years, we have developed over **114 supportive housing units** supporting over **170 people** in **Inclusive Vertical Communities**. By 2029, this will increase to **136 supportive housing units** supporting over **208 people**. To date, we have completed **7 projects** with several housing providers, including the Toronto Community Housing Corporation, with more currently being developed.

In addition, our **Lawson Redevelopment Project**, is a landmark partnership between Community Living Toronto and **Tridel** that is looking to redefine inclusive urban living. Designed as a mixed-use, multi-tower community, the project brings together affordable and market housing, supported and independent living, office and community space and vibrant public amenities within a single, integrated neighbourhood.



Renderings of Community Living Toronto's Lawson Redevelopment Project.

With our past Inclusive Vertical Communities, we have always been brought to the discussion when the process is well underway. At its core, the Lawson Redevelopment advances a new model of development, one where people with intellectual and developmental disabilities and the agencies that support them are intentionally included from the outset. By embedding accessibility, social connection, and community participation into every aspect of the design, the project moves beyond traditional housing approaches to create a truly inclusive community of belonging.



Once complete, the development will deliver **five residential towers ranging from 28-55 storeys, a dedicated community hub, park and a range of public amenities**, all designed to support diverse residents and foster meaningful connections. The Lawson Redevelopment demonstrates how innovative partnerships between the non-profit and private sectors can expand housing choice, promote inclusion, and set a new standard for equitable, community-focused city-building.

Housing remains one of the pressing issues facing the people we support and for individuals with an intellectual disability, access to safe, accessible and affordable housing is a pathway to belonging and independence.

1.3 Context: Canadian Policy Environment

Housing policy in Canada is shared across orders of government, but the federal role is uniquely influential through funding, financing, and mortgage insurance through Federal frameworks such as Build Canada Homes and CMHC mortgage loan insurance programmes.

At the same time, provinces and territories carry responsibility for developmental services, income supports, health and social services that directly affect housing stability for people with IDD. Municipal governments shape outcomes through planning and zoning decisions. The system is overly complex and gaps remain pronounced. Waitlists are long, caregivers are aging, and many families face crisis-driven housing decisions.

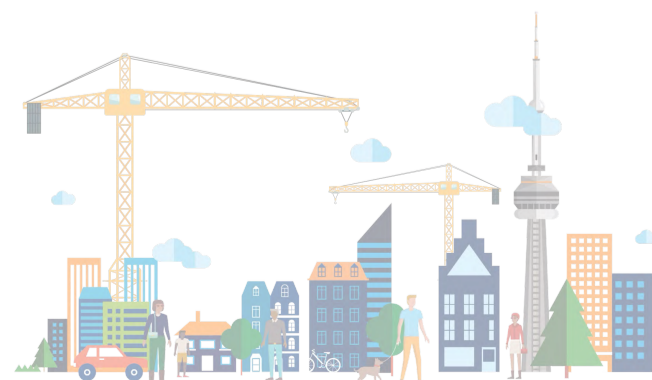
Within this context, mortgage insurance rules stand out as a powerful but under-examined federal policy lever. Adjusting these rules to include condominiums does not alter constitutional responsibilities or service delivery systems. Instead, it enables not-for-profits and community housing providers to do more with existing tools.



Renderings of Community Living Toronto's Lawson Redevelopment Project.



Renderings of Community Living Toronto's Lawson Redevelopment Project.



1.4 Changing Policy Landscape: Canada's Housing Crisis & Build Canada Homes

The proposal in this Green Paper comes at a pivotal time in Canada's housing policy.

In September 2025, the government took a major step by launching **Build Canada Homes**, a newly formed federal agency with an initial capitalisation of **\$13 billion**⁴. *Build Canada Homes* is specifically tasked with driving large-scale affordable and supportive housing development, leveraging public land, modern construction methods (modular, mass timber), and public-private partnerships.

The agency's first wave of investments includes six public-land sites (Toronto, Ottawa, Winnipeg, Edmonton, Dartmouth, Longueuil) set to deliver approximately 4,000 homes using factory-built construction. It has also created a \$1.5 billion Canada Rental Protection Fund to preserve vulnerable rental buildings, and \$1 billion for transition and supportive housing.

Critically, *Build Canada Homes* is mandated to support "mission-driven organisations whose core purpose is to advance social, community, or equity-focused goals," including organisations serving people with disabilities, Indigenous communities, seniors, and others.

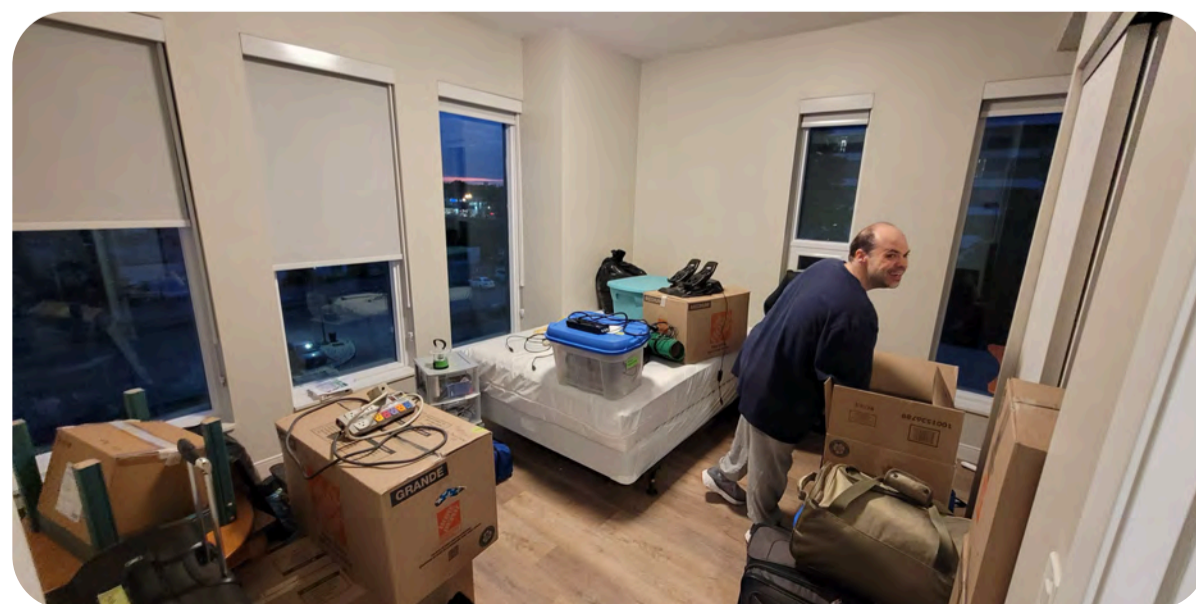
In this evolving federal framework, the proposal for a single multi-unit mortgage becomes incredibly timely.⁵⁻⁹



1.5 Scope of This Paper

This Green Paper focuses on proposing a consolidated mortgage structure for not-for-profit organisations to acquire multiple units under one mortgage within condominiums. The paper explores the benefits, challenges, and possibilities, specifically in the context of inclusive housing (i.e., those with developmental disabilities) and within the framework of Build Canada Homes and CMHC.

Importantly, this is not a paper about construction financing for new buildings, zoning reform, or provincial service delivery. Rather, it addresses a possible tool for financing that can unlock existing and future housing stock for supportive, mixed-population housing whilst also aligning with the federal government's new housing priorities.



2. Understanding the Policy Challenge

2.1 The Urgent Need for Housing for People with IDD in Canada.

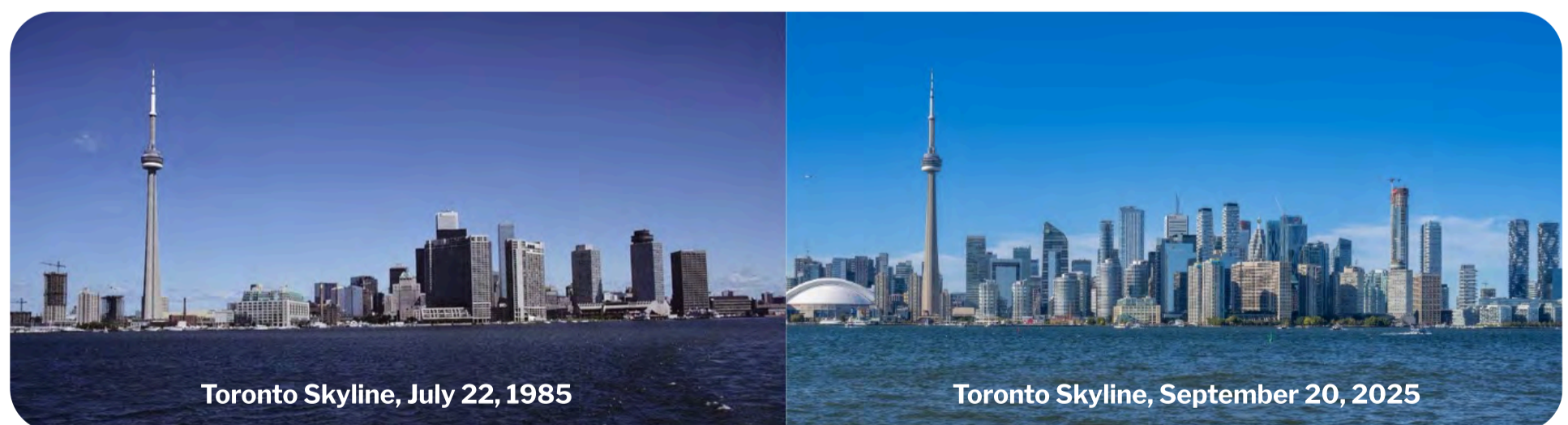
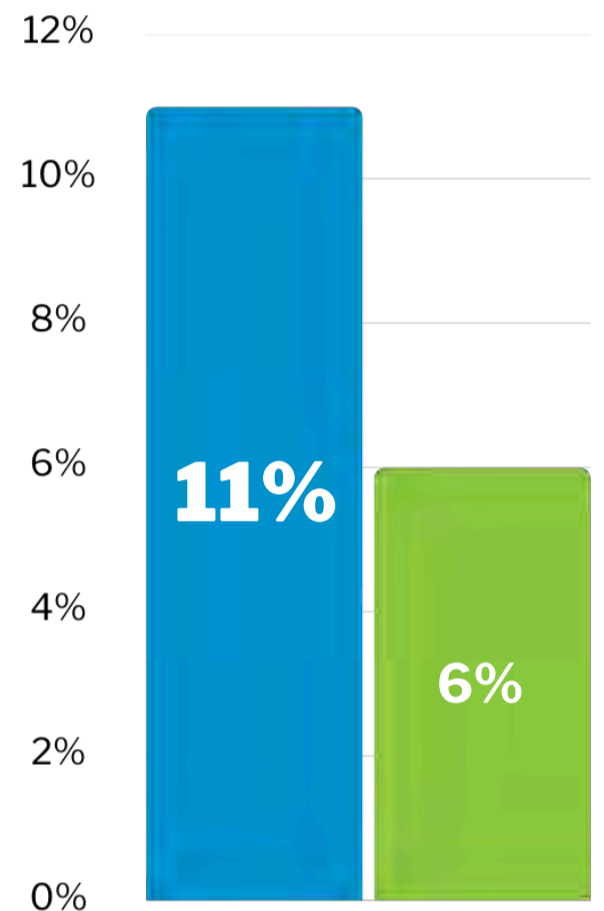
According to Inclusion Canada’s fact sheet, using a median 2% prevalence rate, an estimated **686,000 Canadians** live with intellectual and developmental disabilities across the country.

Research from across the globe consistently shows that people with IDD are over represented in homeless populations. Multiple sources suggests that **individuals aged 15 and older with developmental disabilities** are **twice as likely** than the general population to experience “**core housing need**” (i.e., housing that is not adequate, suitable, or affordable). ¹¹⁻¹²

These numbers reflect a systemic shortfall: many people with IDD live in poverty, depend heavily on inadequate public supports and families, and lack access to independent, stable housing options. Moreover, data collection itself remains a challenge, as important subpopulations, including people in group homes, institutional settings, or experiencing homelessness are frequently undercounted in national surveys. ¹²⁻¹³

At a provincial level, the severity of the housing crisis for people with developmental disabilities becomes abundantly clear. In Ontario, provincial investment in developmental services housing has stagnated for decades, leading to a growing waitlist: Approximately **30,000 people** in the province living with a developmental disability are waiting for supportive housing. Wait times for supportive housing are 10 times longer for people with developmental disabilities than for other affordable housing seekers. Similar pressures are evident in provinces across the country. In British Columbia, nearly one in five people with disabilities lives in core housing need, and thousands remain on waitlists for housing. In Alberta and Saskatchewan, rates of core housing need among people with disabilities exceed provincial averages, while service systems report thousands of adults with developmental disabilities waiting for appropriate community living options. ¹³⁻²¹

- Canadians living with intellectual and developmental disabilities
- Canadian Households



Whilst city-level data on IDD-specific housing is harder to isolate, Toronto, as Ontario’s largest municipality, is strongly impacted by these systemic trends. Many Toronto-based adults with IDD rely on community service providers like Community Living Toronto for housing and supports, but face long waits, limited options, and insufficient funding to acquire or maintain units in the city’s highly competitive housing market. It is estimated that between **12% and 39% of the homeless population nationally might have a developmental disability**, with recent Toronto studies finding that **18%–30% of shelter users in the city are strongly suspected of having an undiagnosed developmental disability**. ^{12, 16, 17}



2.2 Policy Gap: Condominium Based Housing for Inclusion

Under prevailing CMHC programmes, such as **Multi-Unit Mortgage Loan Insurance (MLI)** and the **Rental Construction Financing Initiative (RCFI)**, long-term, low-cost, insured financing for apartments and developments owned and operated as unified assets can be provided. ²²⁻²³

However, contemporary urban development increasingly relies on more complex, mixed-use, condominium style development projects. And no equivalent, scalable CMHC-backed financing mechanism currently exists for the collection of multiple condominium units, each with its own legal title, under a single mortgage, even when those units are owned by one organisation, located within the same building, and operated as long-term supportive housing. ^{22, 24}

CMHC underwriting and insurance frameworks are designed around the concept of a single property on a single title. Meaning, a borrower holds a mortgage over an entire building or a clearly defined contiguous portion, such as a full floor. From a traditional risk perspective, this approach is understandable: it simplifies collateral assessment, makes insurance easier and aligns with historical development patterns dating back decades. But, as a result, condominium units, separate legal parcels, fall outside the scope of standard multi-unit financing models. Whilst the physical distribution of units within a building is not itself a constraint, the presence of multiple condo titles prevents the use of a single insured mortgage. ^{22, 24}

This limitation has significant implications for inclusive housing policy, particularly for people with IDD. In many urban centres, condominiums now represent the dominant form of new and existing housing stock. They offer a practical and socially integrated pathway for housing people with IDD in mixed communities, supporting independence, dignity, and inclusion. The absence of a viable public financing pathway for aggregated condo acquisition inadvertently reinforces two undesirable outcomes:

- the continued reliance on **purpose-built, clustered models** that risk segregation; and
- the underutilisation of existing housing stock that could otherwise support **non-institutional, community-based living**. ²⁵⁻²⁶

Where portfolio or blanket financing is possible, it is typically offered only by private or alternative lenders on bespoke, higher-cost terms, without CMHC insurance or long-term affordability protections. For not-for-profit organisations and community housing providers seeking to integrate people with IDD throughout these developments, acquiring units is fraught with complexity and the current rules present a fundamental barrier. Financing dispersed units becomes difficult or impossible, even when projects are otherwise financially sound and socially desirable. As mentioned previously, DS Agencies are often added at the end of project or when developments are already well underway.



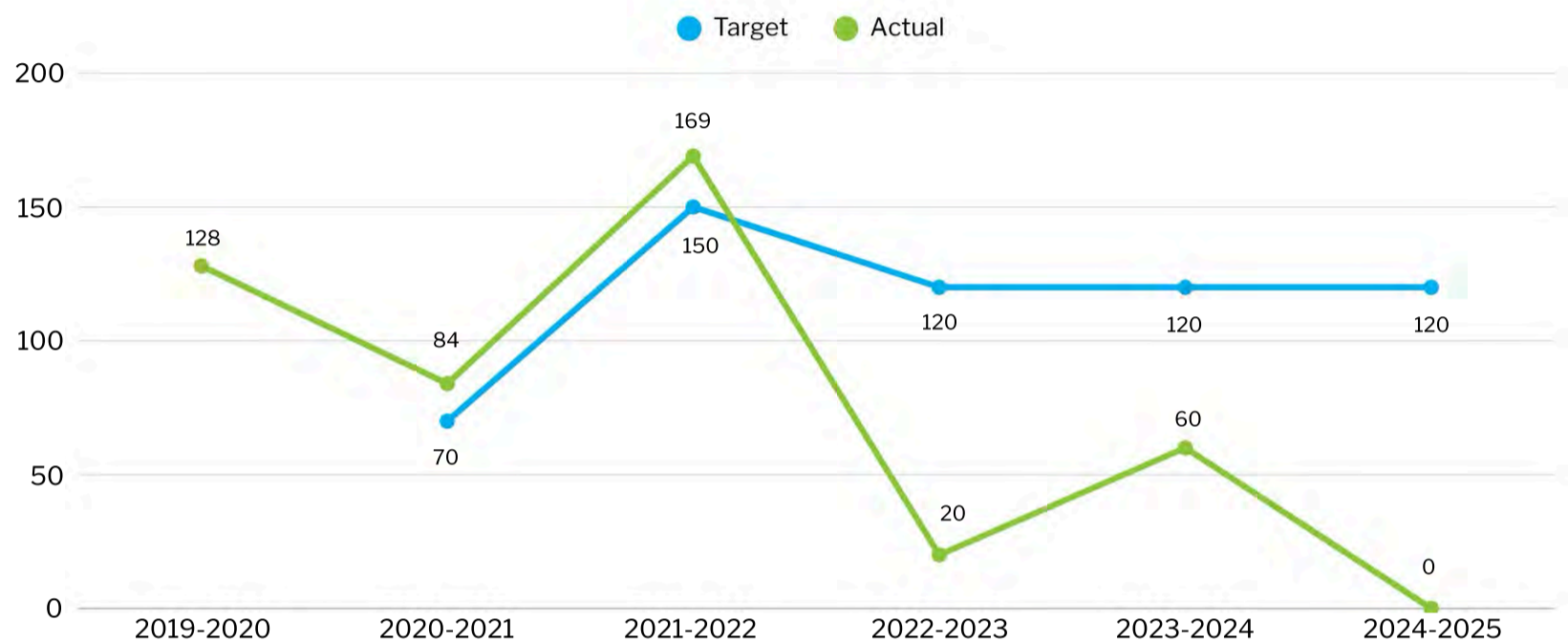
This fragmentation limits the scale at which not-for-profits can act. Suppose CLTO or another agency wants to acquire 20 condo units in a vertical community: they must negotiate 20 separate mortgages or secure complex financing. This is inefficient, risky, and often prohibitive.

In effect, when it comes to condo units, Canada's housing finance system currently supports scale without integration (through large rental assets), or integration without scale (through individually financed condominium units). The absence of policy tools that enable scaled, grouped, or aggregated condominium ownership under a single mortgage represents a clear gap, constraining innovation in inclusive housing delivery.



The impact is that inclusive housing can be more directed toward clustered segregated configurations. Raising fears of a return to institutionalisation for those with developmental disabilities. Whole floors or buildings dedicated exclusively to people with disabilities on paper may meet some short-term housing needs, they can limit everyday social interaction and risk perpetuating stigma and separation.

Multi-Year Supportive Living Program - Community Waitlist
Number of individuals supported



Source: Paul Dubé, Ombudsman of Ontario (2025, November), *Lost in Transition*, page #37

To be clear, this proposal also does not seek to alter core property law principles, condominium ownership structures, or lender security rights. Each unit would continue to exist as an individually titled condominium property subject to applicable provincial condominium legislation and municipal regulation. Rather, the proposal seeks to modernise financing treatment by recognising a portfolio of dispersed units operating collectively as a single supportive housing asset. Comparable legal and financial structures already exist in other areas of real estate and institutional financing, including pooled collateral arrangements, portfolio lending, and cross-default security frameworks.

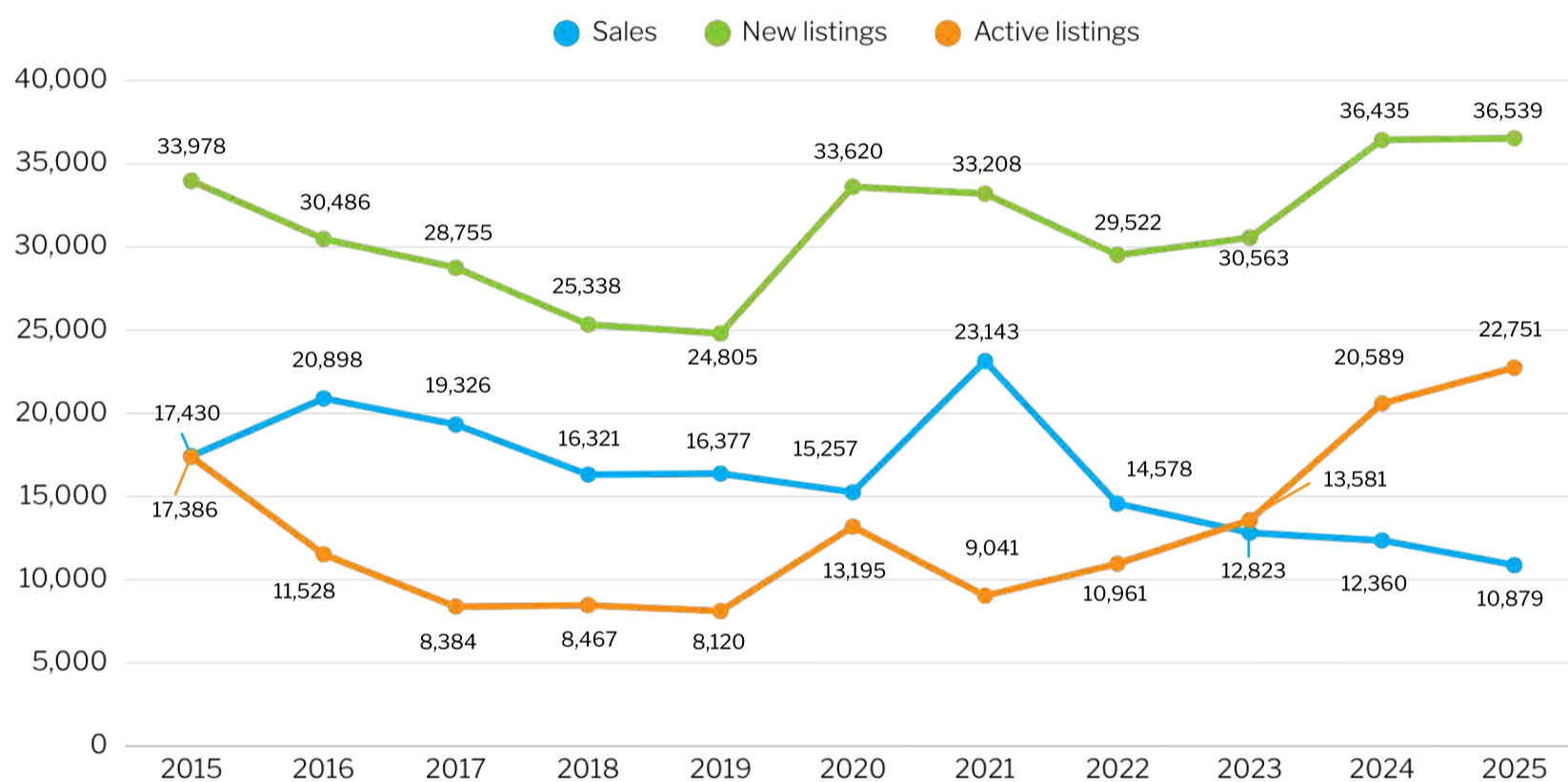
Addressing these gaps would not require abandoning existing CMHC frameworks or property law, but rather adapting them, or complementing them with new programmes, to reflect the realities of contemporary urban housing markets and the need for real inclusion.



2.3 The Case for Urgent Reform

The need for change is urgent. Canada is in the middle of an accelerating housing crisis marked by rising costs, limited supply, and deeply inequitable access, with the greatest impacts falling on marginalised populations including people with developmental disabilities. Federal policy commitments have already acknowledged people with developmental disabilities as a priority population under the 2017 National Housing Strategy, yet the number of dedicated and appropriate units remains far below demonstrated need or allocated amounts. At the same time, the federal government has demonstrated a willingness to modernise housing tools and supports, with the launch of Build Canada Homes it has opened an important window for innovation, signalling a clear intention to partner with organisations to deliver affordable and community-based housing at scale. ²⁷⁻²⁸

Toronto Housing Market
Home Sales vs Available Inventory (2010-2025)



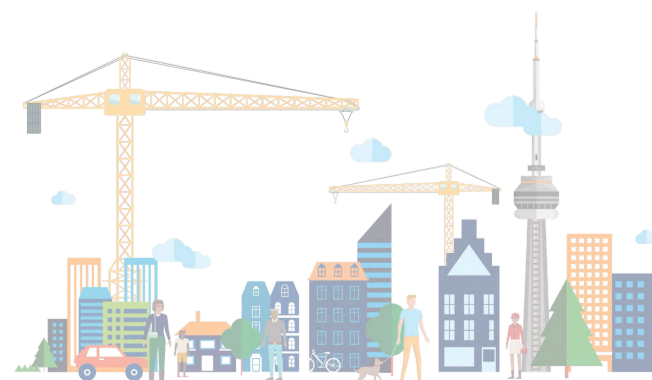
Source: Toronto Regional Real Estate Board, Multi-Year Quarterly Rental Market Report, www.trreb.ca

However, expanding construction alone will not deliver inclusive, affordable long-term housing solutions. Without parallel innovation in housing finance, the social housing, disability sectors and others risk being sidelined, even as billions of federal dollars are being invested in scaling up housing delivery. ²⁷⁻²⁸

This disconnect is especially pronounced as development increasingly shifts toward dense, vertical, and mixed-use projects, whilst demand for inclusive housing continues to grow due to aging caregivers, intensifying support needs, and longstanding service gaps. ²⁹⁻³⁰

In many major Canadian cities, particularly the Greater Toronto Area (GTA), Montreal and Vancouver, condos represent the dominant form of housing supply, especially in transit-accessible, urban neighbourhoods. These locations are well suited to supporting truly independent living, access to services, and community participation for people with IDD and a change in the approach to housing is long overdue. ^{29,31}

At the same time, the Toronto condominium market has experienced a significant downturn in recent years. With declining sales, rising inventory, and reduced investor activity dampening overall market confidence and slowing new construction. ³²⁻³³



- **Historic Decline in Sales:** New condominium sales have dropped to record lows, signalling a sharp pullback in buyer activity. ³²
- **Rising Unsold Inventory:** A growing backlog of unsold units is placing downward pressure on prices and delaying project timelines. ³²⁻³³
- **Retreat of Investor Demand:** Higher interest rates and market uncertainty have led investors, traditionally key market drivers, to step back. ³³
- **Softening Prices and Construction Slowdown:** Weakened resale activity and pricing have contributed to reduced development pipelines and broader market hesitation. ³³



In this context, not-for-profit acquisition of condominium units presents a stabilising opportunity. By absorbing excess inventory and introducing steady, long-term demand, non-profit housing providers can help support price stability and restore confidence, without the volatility associated with speculative investment. Unlike speculative investors, not-for-profit housing providers operate with long holding periods and predictable occupancy, offering a form of demand that can support market recovery without inflating prices. ^{32,34}

This all adds to the fact that now is a timely opportunity for targeted reform. By advancing a consolidated mortgage structure financing model for condos tailored to not-for-profit organisations, Community Living Toronto seeks to address a critical gap: enabling the acquisition of multiple condominium units within vertical, mixed-use developments under a single mortgage.

This reform would support integrated, sustainable, community-based housing for people with IDD, improve life outcomes, contribute to the stabilisation and recovery of the condominium market and directly contribute to Canada's broader housing supply, affordability, and inclusion objectives.

2.4 Unlocking Existing Housing Supply: Mobilising Under-Utilised Housing Stock

While expanding new housing construction remains pivotal to addressing Canada's housing shortage, equal attention must be given to better utilising existing housing stock. Reusing existing units can deliver housing more quickly and often more cost-effectively than new development, while maximising the value of buildings that have already been constructed. ³⁵⁻³⁶

Despite the recent downturn in the condominium market, condominium units remain a significant component of the housing system in major Canadian cities. According to the Canada Mortgage and Housing Corporation, rental condominiums account for approximately 19.3% of rental units across major Canadian urban centres, and in cities such as Toronto they represent more than one-third of the rental market. This reflects the increasing role of condominiums as a secondary rental market, supplying housing through units owned by individual investors rather than large institutional landlords. ³⁶

The sharp slowdown in the condominium market has led to a notable increase in unsold inventory and newly completed but unoccupied units, particularly in the Greater Toronto Area. Higher interest rates weakened investor demand, and rising construction costs have contributed to one of the weakest condominium market cycles in decades, with projects stalling and thousands of units remaining unsold or vacant. ³⁷⁻³⁸



Recent market developments further underscore this shift. A Toronto-based investment firm, supported by the Government of Ontario's Building Ontario Fund, has announced plans to acquire up to \$1.3 billion in unsold condominium inventory with the intention of converting these units into rental housing, highlighting growing private and public sector interest in repurposing under-utilised condominium supply. This signals an emerging recognition that existing condominium stock can play a more intentional role in addressing housing affordability challenges. ³⁸⁻⁴⁰

Taken together, these trends illustrate a central paradox in Canada's housing system: acute housing shortages exist alongside under-utilised housing stock. Unlocking these existing units for affordable housing represents a practical and timely opportunity to accelerate delivery while responding to evolving market conditions.

These recent initiatives to acquire unsold condominium inventory for rental conversion demonstrates that market actors are already moving in this direction. Public policy can build on this momentum by enabling non-profit housing providers to participate at scale. ³⁸⁻⁴⁰

By enabling portfolio-based financing for scattered condominium acquisitions, governments can unlock under-utilised housing supply, accelerate delivery timelines, and expand inclusive housing options across Canadian cities.

3. International Scan & Comparison: Financing for Multi-Unit Inclusive Housing

Research into international models has shown that there are no clear cases of government insured single mortgages for multiple condominium units, of the type being proposed in this paper. However, several international models provide closely related approaches, offering lessons and highlighting the current limitations of existing CMHC programmes.

United Kingdom

In the United Kingdom, housing associations routinely hold multiple units scattered throughout privately developed or mixed-use buildings and finance them as a single portfolio. Organisations such as **Dimensions UK**, **Innovate Trust**, and **Newlon Housing Trust** partner with private developers to acquire units within larger buildings, ensuring people with learning disabilities and autism live in ordinary homes as part of the wider community and manage them collectively through single portfolio financing mechanisms provided by intermediaries such as **The Housing Finance Corporation (THFC)**. ⁴²⁻⁴³ The THFC aggregates borrowing for multiple housing associations, lowering costs and spreading risk, which enables providers to scale inclusive housing without clustering residents physically.

Homes England has described this approach as enabling "mixed and balanced communities" while allowing providers to manage risk efficiently. ⁴⁴

Whilst these examples do not specifically document separate condominium titles financed under a single insured mortgage, the **principle of portfolio-level finance enabling dispersed, integrated units** is directly relevant to the policy goal of supporting inclusive, scattered housing in condominium settings. ⁴²⁻⁴⁴



European Union

Across Europe, cooperative, inclusive and social housing systems are increasingly delivered through cooperative, social, and partial-ownership models financed through single borrowing arrangements allowing residents with disabilities to live alongside non-disabled neighbours. The **European Association of Service Providers for Persons with Disabilities (EASPD)** has documented cases from **Finland, Spain, Slovakia, Greece, and Moldova** where providers acquire multiple units within larger residential buildings and finance them through aggregated arrangements and people with disabilities live in ordinary housing with personalised supports. Whilst these are often cooperatives or shared-ownership units rather than condominium titles, the **key principle is the same:** financial aggregation supports inclusion, reduces segregation, and enhances scalability. EASPD also notes that successful implementation of Article 19 of the UN Convention on the Rights of Persons with Disabilities requires “*alignment between housing policy, support services, and investment frameworks,*” underscoring that finance structures must enable, not constrain, inclusion.



Evaluations consistently show that these arrangements reduce isolation, improve autonomy, and are cost-effective compared to institutional or congregate care models.

EASPD highlights that when these elements are fragmented, such as when financing mechanisms are designed for conventional real estate rather than social inclusion outcomes, people with disabilities face increased structural barriers to living independently in the community. Conversely, aligned systems enable providers and developers to plan, finance, and deliver housing that is embedded within mainstream communities, with supports that are portable, person-centred, and responsive over time.

This alignment also requires investment frameworks that recognise the long-term social and economic value of inclusion, including reduced reliance on institutional care, improved health and wellbeing outcomes, and greater participation in community life. As such, financing structures must be intentionally designed to facilitate integrated delivery, supporting portfolio approaches, flexible ownership or leasing models, and partnerships between non-profit organisations and private developers, rather than constraining them through fragmented or unit-by-unit funding approaches.⁴¹

Australia

In Australia, under the **National Disability Insurance Scheme (NDIS)**, individuals receive portable funding for housing and supports, while providers acquire multiple accessible units within mainstream apartment buildings. These units are typically dispersed throughout a development and financed together through structured investment arrangements, supported by the **National Housing Finance and Investment Corporation (NHVIC)**, which offers credit enhancements and low-cost capital.

In Melbourne, providers, such as **InPlace Living** for example, hold multiple Specialist Disability Accommodation (SDA) units located across different floors of a larger multi-family complex. The Australian Productivity Commission has noted that this model “supports choice and control while enabling sustainable investment.”

Research from the **Australian Housing and Urban Research Institute (AHURI)** confirms that Individual Supported Living models, which depend on scattered units, produce better life outcomes and are more cost-effective over time.

Again, while these arrangements are not formally condominiums in every case, the portfolio financing approach illustrates how multiple non-continuous units can be managed and financed together, which is the principle this policy reform is seeking to adopt.⁴⁵⁻⁴⁷



United States

In the United States, not-for-profit housing providers sometimes acquire multiple condominium or apartment units in dense urban developments through Federal agencies such as the Federal Housing Administration (FHA) and Freddie Mac providing instruments for project financing. But limits exist. Single entities may only own a limited percentage of units before the project becomes “non-warrantable” for insured loans. Freddie Mac has stated that its programmes are intended to support “integrated housing that expands access while maintaining sound underwriting.”⁴⁸



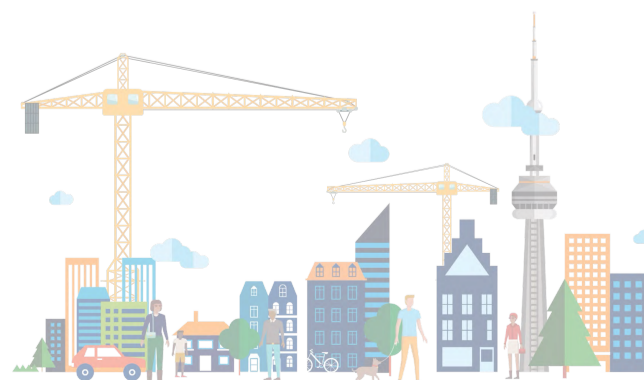
Possible Lessons:

While these programmes are not identical to what is being proposed by this paper, they do demonstrate that the right financing can support integrated, inclusive housing when structured appropriately and tailored to individual circumstances.

Modernising CMHC’s mortgage insurance framework to permit **single insured mortgages covering multiple non-adjointing condo units within the same building** would advance CMHC’s stated objectives around mixed communities, housing stability, and prudent risk management, while supporting the federal government’s housing goal of supporting “mission-driven organisations whose core purpose is to advance social, community, or equity-focused goals.”

The current barrier is a financing rule that is no longer aligned with how housing is now built and how inclusion is truly achieved.

Addressing this gap would unlock the ability of organisations like Community Living Toronto to participate fully in vertical, mixed-use developments and deliver truly integrated housing for people with intellectual and developmental disabilities.



4. Objectives for Policy Reform

The objective of reform is not to create a special carve-out, but to modernise mortgage insurance policy so it reflects contemporary development realities, public values and better leverages not-for-profit capacity. Specifically, reform should enable inclusive, mixed-ability housing within mainstream condo developments; align mortgage insurance practices with Canada's human rights commitments; support innovation by non-profit providers; and maintain prudent risk management consistent with CMHC's mandate.

Against this backdrop, the proposed policy reform seeks to:



1. Enable Scalable, Community-Integrated Housing

By making it financially viable for not-for-profits to assemble collections of condo units, we can support inclusive, mixed-tenure housing where people with developmental disabilities, seniors, and others live alongside their neighbours in vibrant vertical communities.



3. Leverage the Momentum of Build Canada Homes

Aligning this financing mechanism with Build Canada Homes' mandate amplifies the federal commitment to mission-driven housing whilst creating a new opportunity for public-private-not-for-profit partnerships.



4. Learn from Global Best Practices

By learning and adapting from programmes used in other jurisdictions (i.e., UK, Europe, Australia etc.), Canada can innovate in a way that draws on proven models whilst adapting them to local context and need.



2. Improve Cost Efficiency and Financial Sustainability

A single mortgage covering multiple condo units reduces administrative burdens, legal costs, and duplicative financing, thereby freeing up not-for-profit resources for operations, supports, and long-term maintenance.



5. Advance Equity, Inclusion, and Rights

Ensure that all feasible options for housing are available for marginalised populations, ensuring that housing is accessible, affordable, dignified and integrated.

4.1 Financial Impact Analysis

If CMHC were to insure a single mortgage covering multiple condominium units, this change would generate clear financial benefits:

- **Lower costs:** One mortgage reduces legal, appraisal, and administrative fees, and streamlines reporting compared to insuring separate mortgages for each unit. For example, if each individual mortgage costs \$3,000 in closing and professional fees, a 50-unit grouping of condo units could incur up to \$150,000 in duplicate costs, costs that could be redirected into housing delivery or maintenance.
- **Improved risk management:** Pooling multiple units stabilises debt repayment and reduces default risk. In a portfolio, temporary vacancy or income fluctuation in a few units has less impact on overall repayment capacity than separate mortgages where each must stand on its own.
- **Greater efficiency:** Organisations could scale up affordable housing faster by deploying the same capital more effectively. For example, using combined income and asset value to support a larger mortgage can improve borrowing capacity by approximately 10–20% compared to unit-by-unit lending.

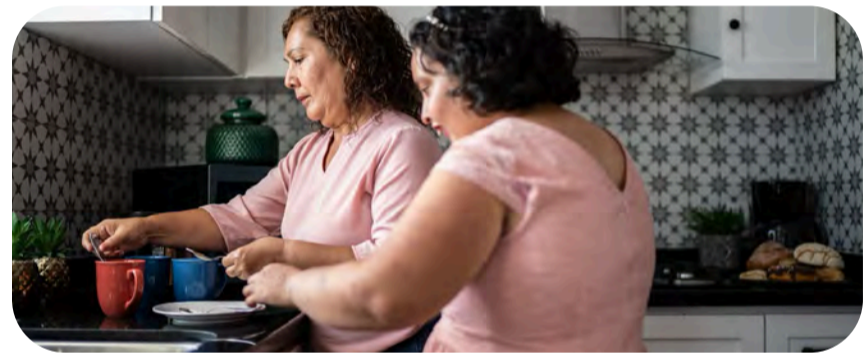


As previously noted, despite them taking a downturn recently, condominiums still make up a substantial portion of the housing supply in major urban centres across Canada such as Toronto, Vancouver, Montreal, and Calgary. In Ontario, condominiums represent more than 50% of new housing completions in major urban areas, highlighting their still significant role in addressing housing affordability. ⁴⁹⁻⁵¹

If CMHC allowed insurers to underwrite multiple condominium units under a single mortgage, it would improve efficiency, reduce duplication, and support faster development of affordable housing across Canada. For example:

- In a portfolio of 100 units, reducing duplicate closing costs alone could save upwards of **\$250,000–\$300,000** in professional fees.*
- Administrative savings in ongoing servicing could free staff capacity to support more insurance applications, effectively increasing output without additional CMHC resources.
- By treating multiple condo units as one mortgage portfolio it spreads the risk, making defaults less likely, similar to the lower loss rates seen in CMHC’s multi-unit rental insurance programme.

In short, changing CMHC policy is not just beneficial for organisations, it also provides incentives for CMHC itself, including the ability to support more Canadians efficiently, without increasing the agency’s exposure to new risks.



5. Policy Options for Government Consideration

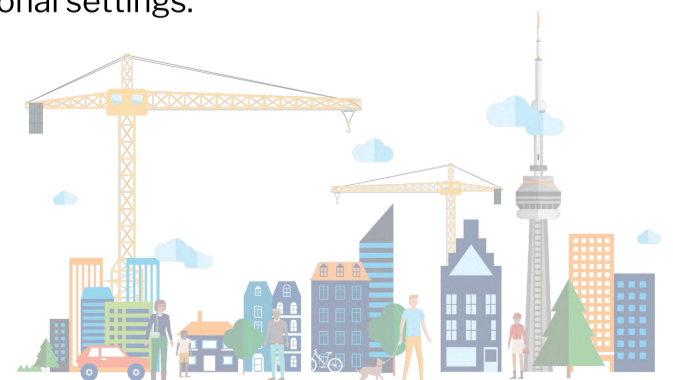
Considering these objectives, we propose three policy options. Each option presents opportunities to support inclusive, integrated housing for people with IDD, while also considering feasibility, risk, and alignment with federal housing priorities.

Option A: A Dedicated CMHC Consolidated Mortgage for Condo Units Programme

Under this model, CMHC would develop a specialised mortgage product tailored for not-for-profit and social service organisations. This would allow a single **CMHC-insured or CMHC-backed mortgage** to cover **multiple condo units within the same building**, held by one entity.

Key Features:

- **Single Mortgage Across Multiple Units:** A CMHC-insured or CMHC-backed mortgage covering multiple condo units within a single building, even if they are physically scattered across multiple floors, provided they are legally consolidated under a single entity.
- **Supports Inclusion and Community Integration:** Scattered-unit acquisition ensures residents are part of a mixed-occupancy building, avoiding clustering that resembles a return to institutional settings.
- **Alignment with Federal Housing Programmes:** The programme could complement **Build Canada Homes**, by supporting the acquisition of existing condo inventory or new mixed-use developments whilst advancing inclusive housing policy goals.

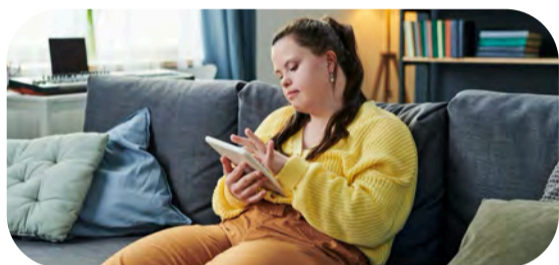


*Estimate based on typical Canadian commercial real estate legal, title insurance, mortgage registration, and underwriting costs of approximately \$2,500–\$4,500 per unit, multiplied across a portfolio of 100 condominium units.

Key Considerations:

- Such a programme would require CMHC to adapt its risk models, underwriting criteria, and insurance frameworks to accommodate these grouped portfolios in condominiums. But once established, it could provide highly stable, long-term financing. Not-for-profits would benefit from reduced legal and appraisal costs, and financial institutions would have greater confidence due to CMHC's risk mitigation.
- Would necessitate broad consultation with key stakeholders including not-for-profit housing providers, private lenders, and municipal stakeholders.

This option aligns strongly with *Build Canada Homes* as the new federal housing agency seeks to accelerate development at scale, CMHC's consolidated mortgage structure programme for condos could serve as a complementary mechanism, supporting the acquisition of existing condo inventory or in new mixed-use development projects.



Option B: Expansion of Existing CMHC Financing Streams

Rather than creating an entirely new programme, existing CMHC programmes could be adapted and expanded to support acquiring multiple condominium units under a single insured mortgage. The **Multi-Unit Mortgage Loan Insurance (MLI) programme, including MLI Select**, is the closest existing framework. Currently, MLI supports multi-unit residential properties under a single legal title, primarily purpose-built rental buildings, with incentives for affordability, accessibility, and energy efficiency. MLI Select particularly rewards social outcomes, making it well aligned with inclusive housing objectives.

Key Features:

- **Uses Existing Tools:** This approach does not reinvent the wheel. It leverages an existing and known CMHC process, reducing administrative and regulatory complexity compared to launching a completely new programme.
- **Cost and Administrative Efficiency:** Leveraging an existing framework avoids unneeded costs and the burden on administration staff of creating a fully new programme.

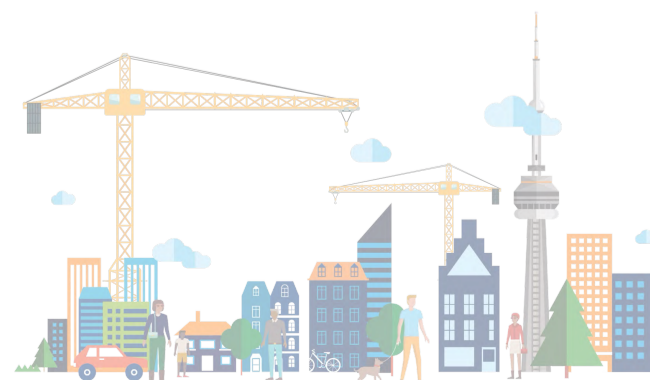
Key Considerations:

- Broad Stakeholder engagement with key stakeholders would still be needed to ensure operational feasibility and smooth implementation.
- Risk assessment and portfolio-level monitoring would need minor adjustments to accommodate condo units rather than just purpose-built rental apartments.

Option C: Financing Partnerships with Private Lenders

A third, possible model involves a public-private partnership (PPP) in which the federal government (or CMHC) provides partial guarantees or credit enhancement for grouped lending products from banks, credit unions, or other financial institutions.

Under this model, not-for-profits would form purchasing entities that acquire multiple condo units. Private lenders provide the primary mortgage financing, whilst the federal government reduces risk with the arrangement through guarantees, direct investment, or CMHC-insured backing.



Key Features:

- **Single Aggregated Financing via PPP:** Multiple units purchased by a not-for-profit would be financed under one agreement with a private lender, supported by government risk mitigation.
- **Mobilisation of Public and Private Capital:** Leverages private lending capacity while maintaining government oversight to ensure affordability.
- **Risk Management:** Government guarantees reduce lender exposure, while not-for-profits maintain operational and social oversight.

Key Considerations:

- Requires structuring legal agreements between not-for-profits, private lenders, and government for credit enhancement.
- Oversight frameworks would need to monitor social outcomes, operational compliance, and maintenance of inclusive housing goals.
- Provides flexibility for nonprofits to scale up and acquire units across multiple developments.

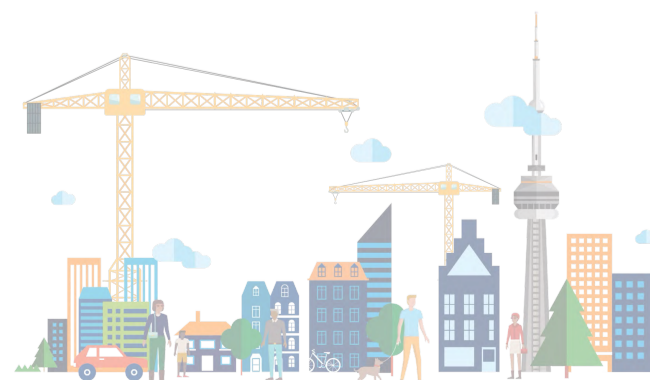
Recommended Option

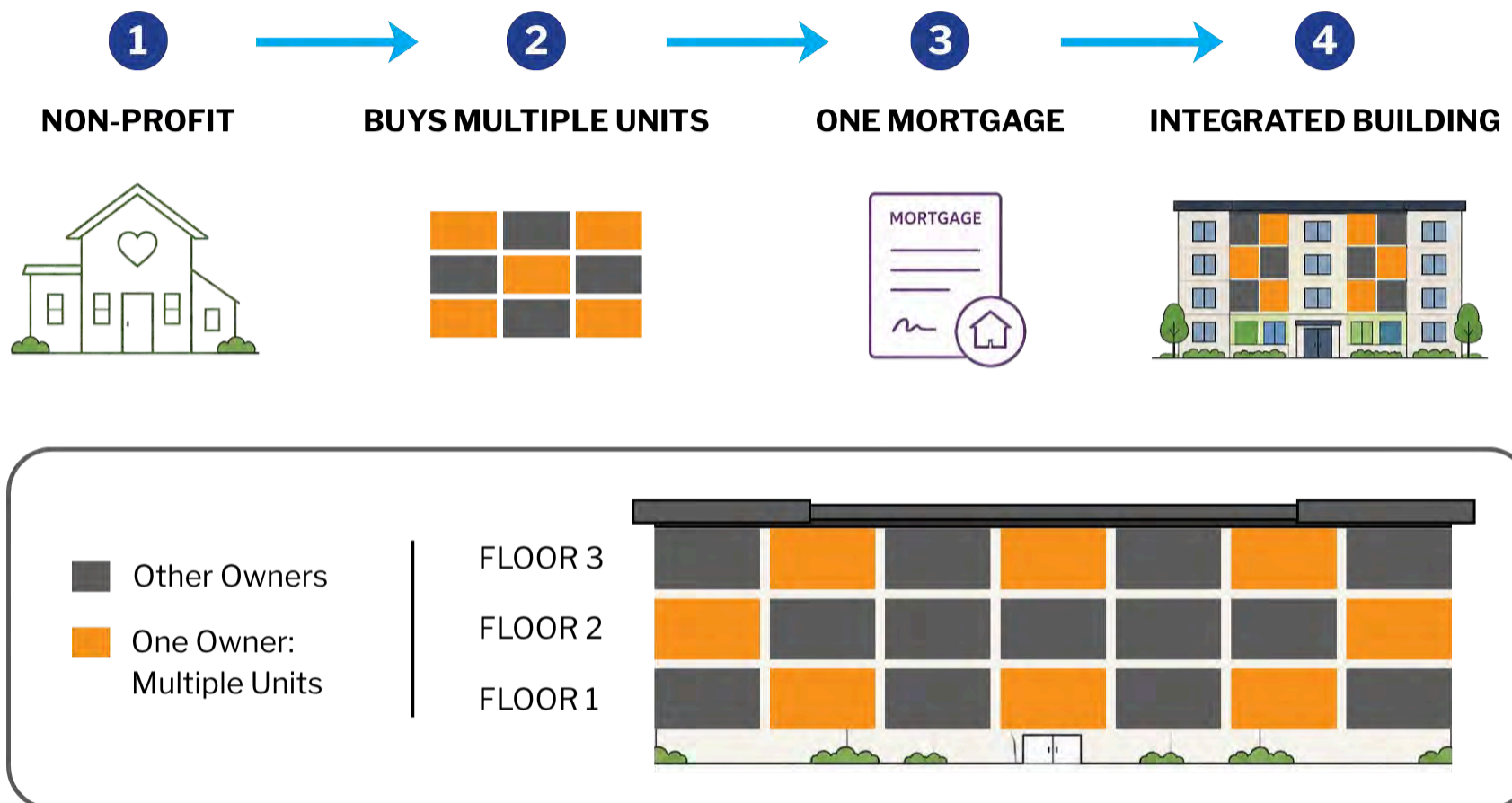
Option A: A Dedicated CMHC Consolidated Mortgage for Condo Units Programme	Option B: Expansion of Existing CMHC Financing Streams	Option C: Financing Partnerships with Private Lenders
<p>Key Features:</p> <ul style="list-style-type: none"> • Single Mortgage Across Multiple Units • Supports Inclusion and Community Integration • Alignment with Federal Housing Programmes 	<p>Key Features:</p> <ul style="list-style-type: none"> • Uses Existing Tools • Cost and Administrative Efficiency 	<p>Key Features:</p> <ul style="list-style-type: none"> • Single Aggregated Financing via PPP • Mobilisation of Public and Private Capital • Risk Management

While all three policy options offer pathways to enable inclusive, scattered-unit housing in a condominium setting, **Option A**, would be the preferred approach.

Whilst it may take longer to implement than other options listed, it would provide a purpose-built, long-term financing solution tailored specifically for the needs of not-for-profit organisations. By allowing a single CMHC insured mortgage to cover multiple, non-contiguous units within a condo building, it would directly address the current financing gap that limits inclusive housing for those with IDD and other marginalised communities. It would also have the benefit of being developed with all of this specifically in mind, rather than being tacked onto an existing programme.

Option A aligns closely with federal objectives under Build Canada Homes, supports CMHC’s mandate for sustainable and affordable housing, and fosters long-term social outcomes for people with intellectual and developmental disabilities.





6. Legal and Governance Considerations

For the proposed inclusive, community-based housing in condominiums to succeed over the long term, financing policy innovation must also be combined with strong legal and governance foundations. This is especially important in condominium settings, where multiple owners share governance responsibility and where a hierarchy of legal documents shapes the use of individual units.

Without clear legal protections in place from the outset, inclusive housing models risk erosion over time through governance changes, resale, or misunderstandings about purpose and use from other condo tenants.

However, inclusive housing delivered through scattered condominium units can be legally secured, transparently disclosed, and governed in a way that protects both residents and the broader condominium community.

6.1 Condominiums as a Viable Housing Model

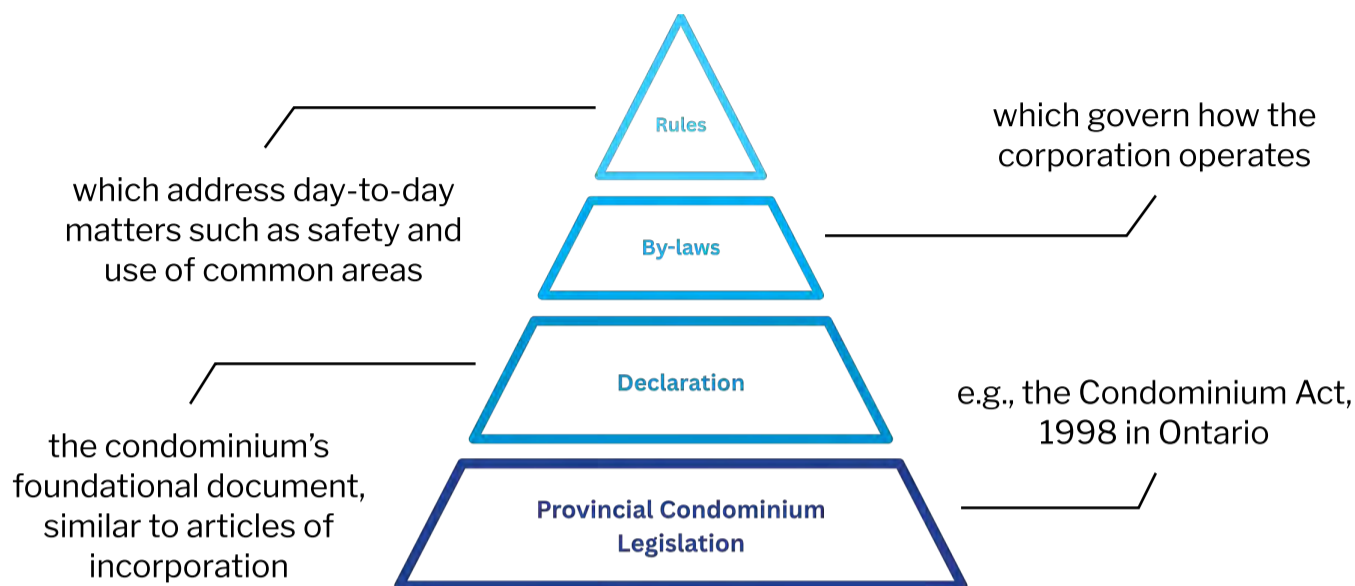
From a legal standpoint, there is nothing in condominium law that prevents nonprofit organisations from owning multiple units, whether acquired individually or as a group. A not-for-profit housing provider such as Community Living Toronto (CLTO) can lawfully acquire and hold several units within the same building, provided that the intended use is clearly established and disclosed.

What matters most is not whether housing is delivered through a condominium, but how its purpose is embedded into the condominium's founding documents.



6.2 The Importance of Founding Documents and Disclosure for Long Term Use

Condominium governance is structured through a clear hierarchy of legal documents:



A key consideration is how to ensure that inclusive housing continues to serve its intended purpose over time, especially when units are embedded in private developments.

For inclusive housing to be protected over time, key commitments must be embedded at the highest possible levels of this hierarchy, particularly in the **Declaration** and **By-laws**. For example:

7 Including in the Declaration sections that require the condominium corporation to recognise and support the ongoing presence of not-for-profit-owned units.

8 Right of first refusal clauses, allowing units to be only transferred to another not-for-profit or public body supplying the same or similar supports and services if ownership ever changes.

Equally important is the **Disclosure Statement**, which must be provided to all purchasers at the time of sale. Full and transparent disclosure ensures that buyers understand the nature of the development, including the presence and role of not-for-profit-owned units and any related governance arrangements. Cases have shown that disputes arise not from inclusion itself, but from inadequate or unclear disclosure.

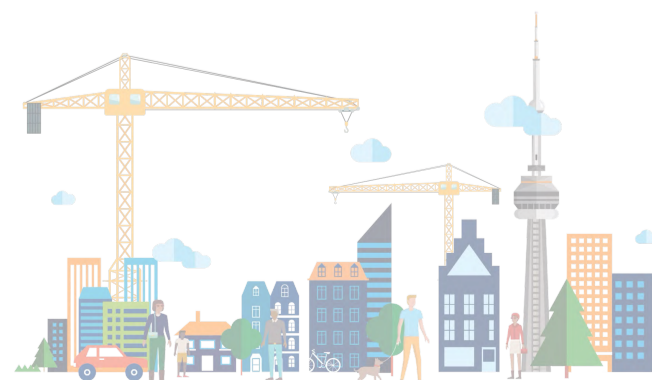
When inclusive housing uses and governance arrangements are clearly disclosed at the outset, they are far more likely to withstand future challenges.

Together, these mechanisms help ensure that inclusive housing remains protected for the full life of the mortgage and beyond, reducing long-term risk.

6.3 Governance Representation and Board Participation

Another possibility to ensure that inclusive housing continues to serve its intended purpose over time in a condominium is reserving a board seat for a not-for-profit housing provider.

Inclusive housing in a condominium works best when not-for-profit housing providers are not passive owners, but active participants in condominium governance.



Legal advice confirms that, whilst there is a lack of legal precedent in this area, **provincial condominium legislation does not prohibit reserving a board seat for a not-for-profit housing provider**, provided certain conditions are met.

In Ontario, for example, a condominium may lawfully reserve one board position for a representative or nominee of CLTO (or, alternatively, a tenant residing in a CLTO-owned unit), so long as:

- The requirement is expressly stated in the Declaration, as a duty of the condominium corporation, and applies only while CLTO owns no less than a defined number of units;
- The arrangement is confirmed in a By-law, i.e., governing director qualifications, nomination, election, and removal;
- All unit owners retain their statutory right to vote, with voting conducted on a one-vote-per-unit basis, as required by law.

Embedding not-for-profit representation in governance helps:

- Prevent misunderstandings or conflict with other tenants.
- Ensure operational realities are understood by the board; and
- Protects inclusive housing from being “squeezed out” over time.



Importantly, condominium legislation already recognises exceptions for reserved board positions in other contexts, reinforcing that such arrangements are possible.

6.4 Scalability and National Applicability

While condominium legislation varies by province, the underlying principles described here, clear disclosure, embedded purpose, and governance participation, are broadly applicable across Canada.

From a policy perspective, these legal considerations

- Are repeatable and scalable.
- Align with how condominiums already accommodate other public and community-serving uses.

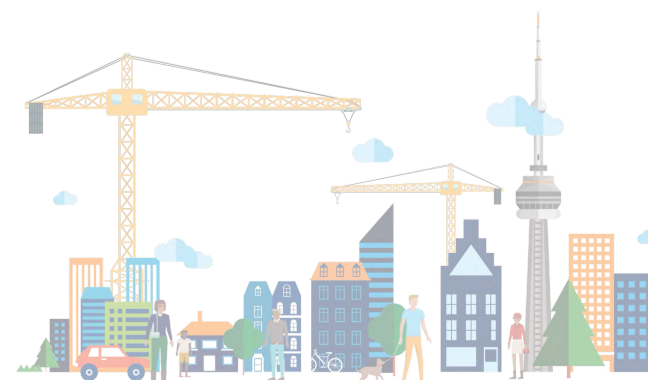
Most importantly, this approach does not require rewriting condominium law. Instead, it uses existing legal tools more intentionally to support inclusive housing outcomes.

6.5 Relevance to CMHC and Federal Housing Policy

As has been noted, historically, condominiums in Canada have been treated primarily as market-driven projects, which has limited their use for assisted, not-for-profit, or community housing. Financing tools and insurance products, including those administered through CMHC, have reflected this approach.

However, as housing supply becomes increasingly vertical and mixed-use, this distinction is becoming outdated. With condominiums serving not just as private residences, but as hubs for integrated community infrastructure. Across Canada, schools, childcare centres, community facilities, and affordable housing units are being incorporated into condominium developments, particularly in high-density urban settings.

From CMHC’s perspective, clearly embedding long-term use, disclosure, and governance protections into condominium documents significantly reduces the risk of a single mortgage covering multiple units in a condominium building.



These safeguards provide transparency and certainty regarding how the units will be used and maintained over time, protecting the integrity of the project and reducing exposure to disputes or operational challenges. In practical terms, CMHC could have confidence that the financial viability of the insured mortgage is supported by predictable management, ongoing oversight, and clear obligations enshrined in the condominium declaration, by-laws, and disclosure statements.

Modernising CMHC mortgage rules to accommodate single-mortgage, multi-unit ownership in condominiums creates a win-win scenario: it advances federal housing policy goals, supports affordable and inclusive housing supply, and manages risk. It positions condominiums as a legitimate, stable platform for community-based housing, rather than a barrier to innovation, whilst giving CMHC the clarity and certainty needed to support these developments confidently.

6.6 Conclusion

When purpose, governance, and disclosure are addressed at the outset, condominiums can theoretically support inclusive, community-based housing indefinitely. This approach offers a legally sound, financially stable, and socially inclusive pathway forward.

If Canada is serious about modernising housing policy to reflect how cities are now built, and how people want to live, then aligning financing tools with durable legal structures is both necessary and achievable.

7. Other Impact and Risk Considerations

While the proposals outlined in this Green Paper offer clear benefits for inclusive housing, several additional impacts and risks warrant careful consideration. Addressing these proactively will help ensure that policy reforms are both sustainable and scalable.

7.1 Financial and Market Risks

Consolidating multiple condominium units under a single mortgage could create financial exposure if a not-for-profit or other social service organisation if it ever experiences extended and ongoing operational or revenue challenges. Total portfolio risk management strategies, including CMHC underwriting adjustments, partial government guarantees, and ongoing monitoring, are essential. Additionally, the valuation of multiple units spread throughout a building may require new specialised or targeted ways to ensure the total value of the portfolio is accurately reflected.

7.2 Social and Community Considerations

Integrated, checkerboard-style condo units for people with IDD enhance inclusion, but they also demand coordination with building management and support services. Inadequate accessibility planning, service provision, or true engagement with neighbours could negatively affect both residents' experiences and overall community cohesion. Providing training and constant building awareness for condo boards, property managers, and residents will support successful integration. This should also extend for ways in which the building community can gather and interact, i.e., game nights, movie nights, pub nights etc. Where everyone in the building and management can be invited to interact with each other at the same time.



7.3 Coordination Considerations

Coordination across jurisdictions will also be critical. Provincial and municipal regulations, including condominium bylaws, zoning, property-tax rules, and service funding, may need to align with this financing model. Any addition of a new programme or adapting an existing CMHC mortgage programme or creating new financing models may necessitate adjustments to regulatory frameworks, reporting requirements, and coordination with provincial and municipal governments in addition to other consultations. Ensuring that reforms comply with existing housing, health, and social services policies across the country is critical, particularly where supportive housing intersects with other statutory obligations.

7.4 Market Acceptance

As part of a broader consultation process special consideration must be given to private developers, financial institutions, municipal authorities, and community organisations. There may be a perception that units being purchased are not genuinely for social purpose, but for resale or market speculation. The safeguards previously mentioned, such as disclosure statement, inclusion in the declaration, resale controls and board representation must be clearly communicated as well as the real social value, financial stability, and risk mitigation measures. These will all be essential for true national uptake.

7.5 Potential Unintended Impacts

- Concentration of not-for-profit ownership in particular condo buildings could unintentionally create social friction if not communicated transparently.
- Changes to mortgage frameworks could impact condo market dynamics, such as resale valuation or investor perceptions.
- Without careful design, supportive housing integration may inadvertently reinforce stereotypes or lead to tokenism rather than meaningful inclusion.

By proactively managing and considering these possible risks, the proposed policy reforms can maximize positive outcomes, provide stable, inclusive, and scalable housing options whilst also protecting both financial and social integrity.

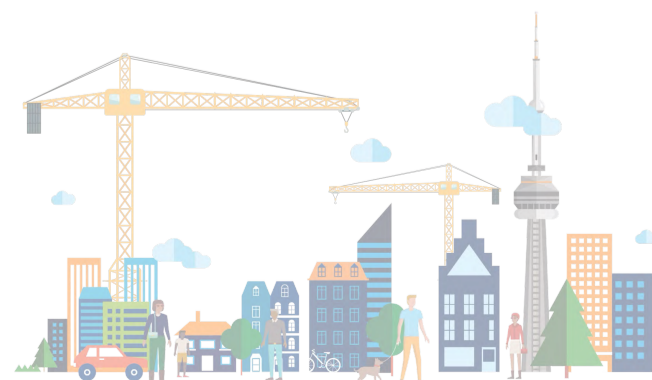


Conclusion

Canada's housing policy is at a turning point. Rising prices, constrained supply, and systemic inequities have left too many Canadians without access to safe, affordable, and integrated homes. People with intellectual and developmental disabilities are particularly affected, facing high rates of core housing need and limited pathways to independent living. Traditional group homes and purpose-built floors, while addressing immediate needs, often perpetuate patterns of segregation and institutionalisation.

Is inclusion also at a turning point?

Build Canada Homes and related federal investments have demonstrated political will and financial muscle for real change in housing. Yet, without innovation and expansion in financing, the ability of not-for-profit organisations to deliver inclusive, community-based housing will remain constrained.

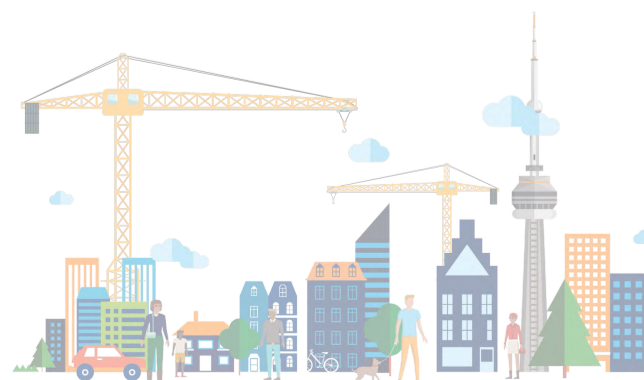


The proposals in this Green Paper respond to a clear policy gap: the inability of not-for-profits to secure a single CMHC-insured mortgage covering multiple, condominium units spread throughout a building. By addressing this barrier, Canada can leverage the existing assets and capacity of not-for-profits, existing and emerging housing stock, including the increasingly dominant vertical, mixed-use condo developments, including CLTO's Inclusive Vertical Communities model, to help deliver inclusive, community-based housing at scale.

This paper has outlined possible paths forward that balances risk management, operational feasibility, and social outcomes. The preferred policy option, **a dedicated consolidated mortgage for condo units programme**, offers a long-term, purpose-built solution that directly aligns with federal objectives under Build Canada Homes and CMHC's mandate for sustainable, affordable housing. Legal protections, clear disclosure, and governance participation further safeguard the integrity of these units over time.

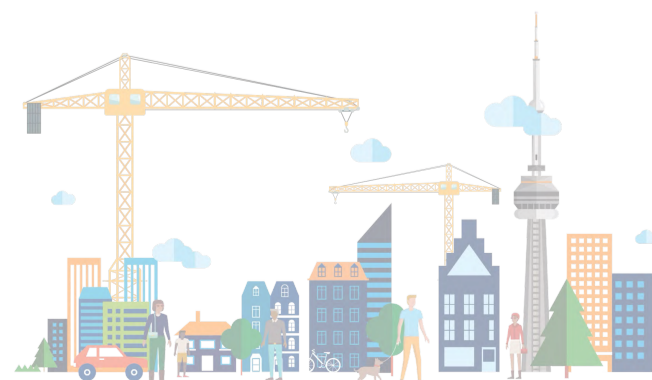
Ultimately, the policy recommendations presented here are not simply about mortgages or building, they are about place. They are about home. About how thoughtfully designed, well-supported living spaces can foster true belonging and independence "*The Power of Place*" is the guiding principle behind this Green Paper. Because truly inclusive living spaces lead to truly thriving lives. By modernising mortgage policy and embedding inclusive housing practices into condominium frameworks, Canada can create more communities where people with IDD not only live but thrive, fully integrated into the social and economic fabric of their cities.

This moment represents a rare opportunity: to align federal housing innovation, not-for-profit capacity, and urban development trends to deliver meaningful, lasting social impact. By adopting the policy measures outlined here, Canada can help ensure that everyone, regardless of ability, has access to a home that supports their independence, fosters community, and strengthens the places we all share.

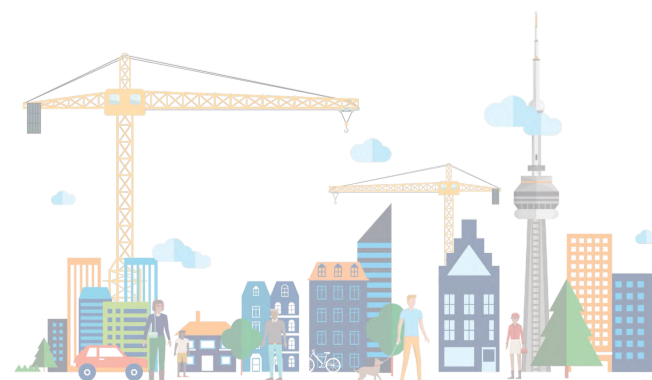


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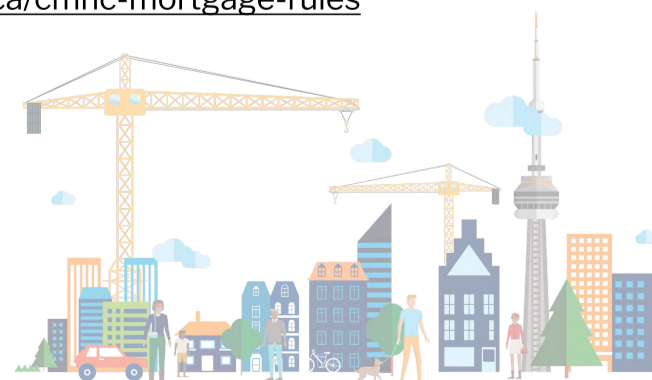


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