

## **Neha Review Panel**

### **CIRNAC Responses**

Since 2016, the Government of Canada has supported the delivery of direct distinctions-based funding to First Nations, Inuit, and Métis organizations related to housing and infrastructure. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) is responsible for the disbursement of approximately \$3.5 billion in housing funding flowing to Inuit Treaty Organizations, Métis governments, and Northern and Modern Treaty and Self-Government First Nation Agreement Holders.

These housing investments stem from a number of different initiatives: Distinctions-based Housing Strategies (Budget 2016 and Budget 2018); Indigenous Community Infrastructure Funding (Budget 2021); Accelerated Housing Initiative (Budget 2022 and Budget 2024); and the Urban, Rural and Northern (URN) Indigenous Housing Strategy (Budget 2023 and Budget 2024). Indigenous governments, communities and organizations have important roles and responsibilities for addressing the housing and infrastructure needs of their membership. Provinces and territories also support housing and infrastructure in Indigenous and northern communities. The relationships and responsibilities can vary from region to region. While there is some complexity in navigating and coordinating the various participants in this evolving landscape, progress is being made.

#### **Conduct meaningful engagement & respect Indigenous rights**

1. Neha is examining the right to safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people. In what ways have individuals and communities directly affected by this issue been engaged in the formulation, implementation, and monitoring of CIRNAC action plans, policies and programs?
2. Please explain what components of relevant action plans, policies and programs affect First Nations, Inuit and Métis individuals and communities.
3. Please describe measures undertaken by CIRNAC to engage with Indigenous governing entities and organizations in the formulation, implementation, and monitoring of relevant action plans, policies and programs, and where appropriate, to transfer control of these action plans, policies and programs to Indigenous governing entities.

#### **Response to questions 1-3:**

CIRNAC delivers distinctions-based infrastructure and housing funding directly to Inuit, Métis, Modern Treaty and Self-Governing First Nations, and northern Indigenous partners, as well as territorial governments. The Department is responsible for the provision of the distinctions-based budget investments for housing and infrastructure but does not manage or administer dedicated housing and infrastructure programs. In most cases, the delivery of these investments is guided by co-developed strategies, or partner-led assessments of need that is rooted in community-based knowledge.

#### ***Distinctions-based Funding:***

Infrastructure and housing investments delivered by CIRNAC support a direct role for Indigenous Peoples in the delivery of programs and services in their communities and respect their governance and right to self-determination. CIRNAC does not take part in delivery of housing or infrastructure programs within program parameters. It is Indigenous partners who determine how funding will be allocated to best support housing and infrastructure needs in their communities. Allocations are based on engagement between partners and their beneficiaries or citizens, reflecting the position that partners know how to best support community housing and infrastructure needs for their respective communities. Supporting the needs of the most vulnerable is a key priority of all Indigenous partners.

In 2017, the federal government established Permanent Bilateral Mechanisms (PBMs) with the Assembly of First Nations, Inuit Tapiriit Kanatami, and Métis National Council. These mechanisms have supported a co-development approach to priority-setting, and policy and program development with Indigenous partners. The PBMs have provided an effective vehicle for advancing shared priorities with Indigenous partners, including housing and infrastructure, and the challenges of programming being fragmented across federal departments and agencies.

#### Modern Treaty and Self-Governing First Nations

Since 2017, the Government of Canada has worked with Modern Treaty and Self-Governing First Nations through the Collaborative Fiscal Policy Development Process to review and develop fiscal methodologies to ensure that Indigenous Governments are adequately resourced to undertake the responsibilities they have assumed under self-government. This work is based on the premise that Indigenous governments are best suited for the delivery of programs and services in their communities. Much of the work that has been undertaken through this forum has focused on infrastructure and housing.

#### Inuit Treaty Organizations

Since 2016, the Government of Canada has committed over \$1.8 billion in distinctions-based investments to the Inuit Treaty Organizations to improve the housing and infrastructure conditions in the four Inuit regions of Inuit Nunangat (Inuvialuit, Nunavut, Nunavik, and Nunatsiavut).

#### Métis, excluding Northwest Territories

Since 2018, \$1.15 billion in distinction-based investments have been committed to Métis for their housing and infrastructure needs. These investments are delivered to six regional Métis organizations (Métis Nation British Columbia, Métis Nation of Alberta, Métis Nation-Saskatchewan, Manitoba Métis Federation, Métis Nation of Ontario and the Métis Settlements Council in Alberta) in response to the needs of their various communities.

#### Northwest Territories First Nations and Métis

In alignment with federal commitments to recognize Indigenous rights and promote reconciliation, since 2021, direct investments in the amount of \$52 million have been provided to support First Nation communities without modern treaty and Métis communities in the Northwest Territories in addressing their respective housing needs. This includes \$18 million through the Indigenous Community Infrastructure Fund (ICIF). These investments are historic in that these communities had not been previously eligible for, nor able to access,

distinctions-based programs based on criteria requiring First Nation communities to be on reserve and Métis to be affiliated with the Métis National Council. Furthermore, an additional \$121 million (including three first Nation Communities in the Yukon) has been allocated for these communities under the distinctions-based funding stream of the URN Indigenous Housing Strategy.

#### Territorial Government Grants:

Housing needs in the territorial North and the challenges associated with improving accommodations are well documented. Due to limited economic development, community growth, and housing markets in small and remote communities across the North, the Governments of the Northwest Territories, Yukon, and Nunavut play a vital role in the housing sector by delivering social and public housing programs to vulnerable populations, including Indigenous peoples, through their respective territorial housing corporations.

In response to requests from territorial government partners for additional funding to support these programs and address the ongoing northern housing crisis, CIRNAC provided \$200 million in flexible, grant-based funding to the territories over three years (2021–22 to 2023–24). This funding supplements existing programs delivered by Housing, Infrastructures, and Communities Canada (HICC) and the Canada Mortgage and Housing Corporation (CMHC). It enables expedited efforts to preserve and expand housing stock and ensure the availability of safe, adequate, and affordable housing for those most in need in the North. Territorial housing corporations develop internal workplans in collaboration with district offices, local housing authorities, governments, and Indigenous partners to identify objectives and priorities.

#### **Incorporate evidence-based targets, timelines, and milestones**

4. Please provide a brief overview of any research, data analysis, or other evidence of relevance to this issue consulted by CIRNAC in the formulation of action plans, policies and programs. What relevant findings can you share?
5. In what way has this evidence informed the design, implementation, and monitoring of action plans, policies and programs?
6. Please provide an overview of targets and timelines of relevance to the issue that are included in relevant action plans, policies and programs, including those for any bilateral agreements under these plans, policies, programs. Do the plans include gender-specific targets?
7. Please provide an update on progress to date against these targets and timelines. Where there are no targets or timelines, provide an update on results to date of action plans, policies and programs, particularly those of relevance to the issue. How are results monitored?
8. Where it is possible to do so, please comment on factors that have contributed to or impeded progress, and any changes that have been implemented as a result.

#### **Response to questions 4-8:**

A lack of historical and direct investments in Indigenous and northern infrastructure has led to extreme gaps and disparity with the rest of the country. Realities such as higher costs, lower tax revenues, limited capacity, shorter construction seasons, and acute climate impacts disproportionately affect Indigenous and northern communities and further hinder the development of infrastructure.

Indigenous partners have developed community plans to inform how best to direct and deliver the distinctions-based housing funding they receive. They report on progress associated with CIRNAC delivered investments, generally on an annual basis using mutually agreed upon templates. Progress is also measured or demonstrated through various reporting tools at the departmental level through program information profiles and [horizontal initiatives](#).

Indigenous partners have developed community driven data, complemented by federal data as necessary, to demonstrate their housing and infrastructure needs. Updates to existing evidence and data are generally commissioned, supported, and co-developed through the permanent bilateral mechanisms and/or other joint tables. Furthermore, Core Housing Need data collected by Statistics Canada is also used and is considered the best measure to monitor progress in this area.

Direct CIRNAC investments for First Nation communities without modern treaty in the NWT and Metis communities in the NWT started in 2021. Up until this time, these communities were ineligible to receive, or have been unable to access, direct infrastructure or housing funding. Reporting requirements for funding recipients include the submission of unaudited financial statements at the conclusion of their respective initiatives, as well as reporting of milestones and projects planned or undertaken. This approach aims to balance the responsible use of funds while respecting community self-determination and capacity needed to report. Recently, the Department has been working collaboratively with partners to develop reporting tools that will help Canada demonstrate results including GBA+ considerations where appropriate, while remaining sensitive to small community needs and safeguarding members' confidential information.

The purpose of the grant-based funding allocated to the Governments of the Northwest Territories, Nunavut, and Yukon between 2021-22 and 2023-24 was to offer a flexible, short-term financial infusion to complement program-based funding from HICC and CMHC. The funding was intended to support existing, yet unfunded, plans and priorities of the territorial governments and their respective housing partners. Since a grant mechanism was employed, there are no specific reporting obligations associated with these funds.

For most federal funding initiatives, CIRNAC works directly with Modern Treaty and Self-Governing First Nations through allocation working groups to develop specific funding allocations for each partner. These working groups draw from research and information shared by Modern Treaty and Self-Governing First Nations that identify the varying needs that each of their communities experience. Data is typically shared by Modern Treaty and Self-Governing First Nations on an as-needed basis in relation to specific federal funding initiatives and CIRNAC works in close collaboration with Indigenous partners to ensure that their data sovereignty is protected and respected.

### ***Results received by CIRNAC as of June 2025:***

It is important to note that certain initiatives supporting Indigenous partners are ongoing. Although reporting requirements do not specify that results must be disaggregated data by sex or other intersectional factors, preliminary reporting by partners indicates that funding has contributed to improved housing conditions through repairs to existing units, alleviated overcrowding by constructing or acquiring new structures, and supported beneficiaries and citizens in achieving greater affordability through housing assistance programs.

#### Inuit

With federal funding received since 2016, Inuit Treaty Organizations have constructed 626 new housing units (completed or nearing completion); repaired 469 existing units, enhanced Inuit-led housing programs; and have undertaken critical land acquisition and development work with the direct, distinctions-based investments. Included in these projects are targeted investments for the construction of new shelters and transition homes for women, youth, and elders, as well as supportive housing. The flexibility of grant funding is critical to addressing infrastructure inequalities while also advancing self-determination. This funding is also enabling further capacity building opportunities, including local economic opportunities for Indigenous-owned businesses.

#### Métis, outside of the Northwest Territories

Federal funding received since 2018 has contributed to the construction or purchase of 1,865 houses for Métis. It has also allowed Métis governments to provide down-payment assistance to 2,118 families, renovation of 6,524 units, and rent subsidies to 10,933 families.

#### Modern Treaty and Self-Governing First Nations

Since Budget 2021, when Modern Treaty and Self-Governing First Nations received their first distinction-based allocation for infrastructure and housing, approximately 1,100 housing units were purchased or constructed in Modern Treaty and Self-Governing First Nation communities. In many cases, these investments were used to support home construction grants for their members or were combined with investments from other governments (including their own) and private lending to maximize the impact of investments. CIRNAC expects to receive further information on the impacts of these investments once a housing working group is established through the Collaborative Fiscal Policy Development Process.

#### Northwest Territories First Nations and Métis

Funding to Northwest Territories First Nation and Métis partners has enabled communities to develop and implement initiatives addressing the unique needs of their membership. Community-led activities supported through this initiative include programs to assist residents with major home repairs (e.g., installation of new sewer tanks, insulation upgrades, electrical work, drywall replacement, and other repairs), initiatives to support homeownership, and affordability supports such as fuel subsidies for vulnerable individuals and families.

#### Territorial Governments

Although there is no obligation to provide detailed reports on the use of grant funds allocated to the Governments of the Northwest Territories, Nunavut, and Yukon, the territorial governments have noted that these funds, in conjunction with CMHC and HICC contributions, have supported significant renovations of existing social and public housing units, as well as

the acquisition of new homes, including modular units. While needs remain great, these efforts have contributed to the improvement, preservation, and expansion of housing stock in the territories for the most vulnerable northerners including Indigenous peoples.

### **Prioritize those in greatest need & eliminate discrimination**

9. Please provide information on how GBA+ analysis, including intersectional and disaggregated data analysis, has been incorporated into the design, implementation, and monitoring of relevant action plans, policies and programs. Have you encountered any data gaps relevant to this issue, and what would you recommend to address these gaps?
10. List any priority groups identified in action plans, policies and programs, and on what basis these priority groups were identified.
11. Please explain in what ways the relevant action plans, policies and programs are designed to address the specific needs of priority groups, and to improve gendered housing outcomes, and housing outcomes for Indigenous peoples and for groups facing disadvantage on the basis of race, disability, family status, sexual orientation, gender identity, and other grounds.
12. Do the action plans, policies and programs include resources specifically allocated to meet the needs of these groups? How were these amounts determined and how are they allocated?
13. Provide a brief overview of any analysis conducted to identify disparities in access to or benefit from action plans, policies and programs. Where such disparities have been identified, explain measures undertaken to improve equitable access for Indigenous peoples and disadvantaged groups.

### **Response to questions 9-13:**

CIRNAC provides distinctions-based investments for housing and infrastructure directly to Indigenous partners which, within program parameters, they determine how to deliver based on the unique needs of their communities. The provision of these funds is guided by the co-developed housing strategies or accord in place between the Government and the respective Indigenous partner. These frameworks emphasize the importance integrating GBA+ by recognizing diverse identities, including gender, age, and cultural background, to ensure housing solutions meet the unique needs of all community members. For example, the Inuit Nunangat Housing Strategy notes that measurement and evaluation of progress in implementing the Strategy will include gender-based considerations, and that GBA+ analysis will be conducted in collaboration with Pauktutit Inuit Women of Canada.

### **Dedicate the maximum of available resources**

14. Has CIRNAC estimated the resources required to address the unmet need for adequate, safe, and affordable housing for women, Two Spirit, Trans, and gender-diverse people, insofar as this issue intersects with the focus of relevant action plans, policies and programs? If so, what is the estimated requirement?
15. Are the resources budgeted for the action plans, policies and programs sufficient to
- a) Resolve the issue?
  - b) Meet the plan's targets and timelines?
16. If resources are insufficient, what is the gap?

**Response to questions 14-16:**

CIRNAC has not estimated the resources needed to specifically address the unmet need for adequate, safe, and affordable housing for women, Two Spirit, trans, and gender-diverse people.

The housing gaps experienced by each distinctions-based groups differ. Partners have estimated the housing gap to exceed tens of billions of dollars with additional investments required to narrow the gap. Many partners have identified the need for additional social housing, shelters and transition homes to fill the needs of women, Two Spirit, Trans, and gender-diverse people.

**Employ all appropriate means, and ensure government coordination**

17. Please provide a brief overview of any relevant laws, policies, regulations, and programs criteria associated with the action plans, policies and programs. In what ways are these laws, policies, regulations, and programs criteria contributing to the advancement of the right to housing for women, Two Spirit, Trans, and gender-diverse people? In what ways, if at all, do they pose barriers to advancement on this issue, and if that is the case, what measures is CIRNAC undertaking to address this?
18. What aspects of the issue are within the mandate of CIRNAC, and which are areas of shared mandate or jurisdiction? Are there key dimensions affecting action plans, in the mandate of other federal departments, or other orders of government?
19. Please provide information on any cross-departmental or cross-jurisdictional initiatives CIRNAC is engaged in on this issue, and their results.

**Response to questions 17-19:**

CIRNAC has a mandate to advance reconciliation with Indigenous Peoples and support enhanced self-determination. In line with the departmental mandate, CIRNAC has

implemented several policies and strategies to support government coordination around housing and infrastructure generally and distinctions-based funding specifically, including the Métis Nation Housing Sub-Accord (2018), the Inuit Nunangat Housing Strategy (2019), the Inuit Nunangat Policy (2022), the U.R.N. Indigenous Housing Strategy, and the National Housing Strategy. In some cases, these policies were co-developed with partners and implementation plans are in place to guide progress. Indigenous partners have been clear that direct funding delivered in the spirit of self-determination, that respects community level decision-making, is critical to the advancement of reconciliation.

### **Promising examples**

20. Please share any lessons learned or promising practices from engagement with individuals and communities directly affected by this issue. What approaches would you recommend to other departments seeking to advance meaningful participation?

21. Please share any programs highlights or funded projects that have been successful in advancing safe, adequate, and affordable housing for women, Two Spirit, Trans, and gender-diverse people. What models would you recommend for replication, and what factors have contributed to their success?

22. Is there anything else you would like to add with regard to the issue Neha is examining?

### **Response to questions 20-22:**

Delivering funding through grant or flexible funding arrangements provides increased autonomy for Indigenous groups to achieve results for their citizens or land claim beneficiaries. Indigenous partners have the flexibility to allocate resources in ways that align with self-determined community priorities. This approach supports Indigenous control and jurisdiction of programs and services (including housing and infrastructure), as well as predictability and certainty of resources. It also advances the Government of Canada's recognition of the inherent right of self-government. This is based on the position that Indigenous Peoples of Canada have a right to govern themselves in relation to matters that are internal to their communities, integral to their unique cultures, identities, traditions, languages, and institutions, and with respect to their special relationship to their land and resources. This overall approach to funding is preferred by Indigenous partners as it addresses some barriers that proposal-based programs are often criticized for and that tend to penalize Indigenous partners (e.g. limited staff capacity and time required to submit proposals, constraints and administrative burden of standard contribution programs).

Indigenous partners are focusing on a number of priorities, including supporting the most vulnerable in their communities. This includes building shelters and transitional housing to

support those fleeing violence as well as elders, including those who may be experiencing elder abuse. In some cases, they are also delivering supportive housing to those in need, leveraging service delivery programs to support individuals and families so they can remain in their home communities.

Distinctions-based funding for Indigenous housing and infrastructure has seen increased levels of investments since 2016. These investments are being delivered in a way that is building important capacity for Indigenous partners and putting decision making in their hands. The advancements made to date are leading to positive impacts and results that are contributing to narrowing the housing and infrastructure gap. While challenges remain, Indigenous partners highly value this approach to investment delivery that is supporting the broader goal to renew the Crown-Indigenous relationship.

The remaining housing and infrastructure gap is significant and will take substantial and sustained effort and time to fully address. It will require whole of government coordination and concerted efforts by all responsible governments and organizations. Continued, sustained investments will help to reduce the housing gap, leading to more safe, improved, and affordable housing and community infrastructure.