AHMA Submission
Affordable Housing Fund Evaluation

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Submitted: October 10, 2025

About AHMA

The Aboriginal Housing Management Association (AHMA) is an umbrella organization of 48 Indigenous housing and service providers. AHMA members manage 95% of all Indigenous housing units located off reserve in BC. This includes over 6,000 units that provide homes to an estimated 10,000 Indigenous individuals and families living in urban, rural, and northern regions of British Columbia (BC). An additional 2,244 homes are currently under development.

AHMA members provide a spectrum of trauma-responsive and culturally grounded housing, including affordable units, homeless shelters, transition homes, supportive housing, complex care, and assisted living facilities. Many of AHMA's members also offer wellness support services, including homelessness prevention, parenting support, and mental health and addictions programs.

Introduction

Since 2018, AHMA has engaged with Canadian Mortgage and Housing Corporation (CMHC) and the Affordable Housing Fund (AHF). This work has included piloting an innovative program-level funding agreement under the AHF. In addition to this, our members have engaged with the AHF to support new developments.

AHMA welcomes the opportunity to provide feedback on the AHF's relevance, coherence, effectiveness, efficiency, and sustainability from the perspective of Indigenous housing providers in British Columbia.

Background

In 2017, the federal government, after nearly three decades, re-entered the affordable housing space through the introduction of the National Housing Strategy (NHS). The NHS committed to invest $115 billon over ten years, this included $76.9 billion to support new construction and repair and renewal. This funding was delivered through the National Housing Co-Investment Fund, renamed the AHF. While the NHS included some significant investments in affordable housing, **it did not include a targeted stream for Urban, Rural and Northern Indigenous housing.**

The majority of Indigenous people live off reserve; this includes status First Nations. Statistics Canada's 2021 Census identified that 62.5% of Indigenous people in Canada live off reserves[1]. These numbers are higher in BC where 75% percent of Indigenous people live off reserve[2]. This is

[1]Indigenous Services Canada. *An Update on the Socio-Economic Gaps Between Indigenous Peoples and the Non-Indigenous Population in Canada: Highlights from the 2021 Census.* Government of Canada. Accessed October 10, 2025. https://www.sac-isc.gc.ca/eng/1690909773300/1690909797208

[2] Aboriginal Housing Management Association (AHMA). *BC Urban, Rural, and Northern Indigenous Housing Strategy: Summary (April 2024)*. August 2024. PDF file. https://ahma-bc.org/wp-content/uploads/2024/08/AHMA-URNIHS-Summary-April-2024-Print-3.pdf.

problematic considering higher rates of core housing need and homelessness. According to the 2025, Point in Time count, 40% percent of BC's homeless population identify as Indigenous[3].

Barriers to Housing

While the re-entry of the federal government as funder has been a welcome development, barriers to housing remain as funding levels do not reflect levels of need, especially for Indigenous housing providers. Available funding streams dedicated to affordable housing, including the AHF, have prioritized mixed market models that operate with few subsidies. Indigenous housing providers are challenged to address deep core housing needs in their communities without operating subsidies. In addition to this, most available affordable funding streams are often a mix of loan and grant funding and require access to land and capital funding. This is especially challenging for new or smaller Indigenous housing provider that may lack access to resources.

While federal and provincial investments in capital renewal and energy are important significant barriers remain as capital funding needs outstrip demand. AHMA members have 1,738 units under Urban Native Housing Operating Agreements, providing housing for an estimated 4,633 people. Built in the 1970ies and 80ies the Urban Native Housing represented the last significant investment by the federal government in affordable housing for off reserve Indigenous communities. For many AHMA member housing stock faces urgent health and safety issues (e.g., heating, electricity, water). Capital renewal funds have been critical but insufficient; there remains a large waitlist of unfunded projects.

Role of the Federal Government

The federal government is an important funder of affordable housing, and much of AHMA members' existing housing stock emerged from their leadership in the 1970s and 80s by funding the Rural and Native Housing Program and Urban Native Housing Program. This program provided subsidies for construction or acquisition of housing units for low-income people in rural areas (population less than 2,500). The program included 400 units a year, or 10% of mainstream social housing allocation dedicated for urban Native non-profit housing groups. Mortgage interest assistance was in the form of non-repayable subsidies to reduce effective interest on mortgage to 2% as well as an allowance for operations and maintenance.

Since the Urban Native Program ended in 1993, there has been limited investment by all levels of government in off-reserve housing for Indigenous people. In the meantime, demand for affordable housing has grown in response increased migration off reserve. The impact of residential schools and the intergenerational trauma that had followed have also contributed to greater socioeconomic need for deeply subsidized affordable housing that includes wraparound supports.

Regardless the jurisdictional issues that may complicate funding off-reserve Indigenous people and communities, we believe that the federal government has a moral and legal obligation to fund housing off reserve. For much of the last ten years, AHMA and our allies have advocated for the federal government to re-invest in Urban, Rural and Northern Indigenous housing. In Budget 2024,

[3] AHMA. *BC Point in Time Count Summary*. Accessed October 10, 2025. https://app.powerbi.com/view?r=eyJrIjoiZjRlZWZjNmMtODJmMS00ZmFjLWIwNjQtYzMzOWNhNTM3NGFkIiwidCI6IjM5OGVmMDlmLTdkZDctNGY0Ni05ZTQ2LWVmMTJkMTFhOThjNSJ9.

the federal government re-committed to funding URN housing by setting aside the $2.8 Billion to fund the Urban, Rural and Northern Indigenous Housing. To date these funds have not been released to our communities and funds remain unspent.

Responding to Housing Challenges: AHF

New Development

For new development from the AHF, AHMA was not engaged in administration of funds or development funding stream. Key barriers to access included loan funding and requirement that land must be secured before applying. This requirement disadvantages providers in high-cost markets. AHMA members also reported that AHF was administrative prohibitive, due in part to the vetting process and the financial terms of its agreements.

Further to this, the AHF, requires organizations to demonstrate at least five years of experience in constructing *and* operating similar housing in terms of size and type. This creates a significant barrier for newer organizations or older organizations who wish to expand their current scope of work. Many Indigenous housing providers are small and do not have any recent experience developing new housing or the necessary expertise.

In addition, to this the AHF is mixed market model, made up of grant and loan funding with limited operating funding. Rents made available through the AHF do not offer Indigenous tenants deep enough levels of affordability to address core housing need. Rental housing units approved under the AHF, which are deemed affordable by CMHC, are often considered unaffordable for low-income households. For the AHF, and other funding made available from NHS, uses different definitions of affordability, all relative to the market price of housing in a specific geographical region. The varying definitions of affordability mean there is no assurance that rents will be affordable for those in core housing need[5].

Capital Renewal

Through the AHF, AHMA was engaged in pilot agreement; this provided AHMA with the flexibility and discretion to allocate $12M. With flexibility, providers incorporated Indigenous art, language, traditional building materials, and gathering spaces - strengthening community pride and cultural safety. The program demonstrated strong outcomes: streamlined approvals, reduced administrative burden, and timely delivery.

While AHMA was entrusted to manage funds directly, misalignment between federal and provincial funding resulted in project delays. Due to urgent needs Indigenous providers are forced to braid multiple funding sources (BC Housing, utilities, CMHC, etc.), a process that is administratively burdensome, especially for smaller societies. Larger providers have more capacity to leverage funding; smaller societies often cannot compete due to administrative requirements.

Additional challenges included strict sustainability targets, which can force technical solutions that are costly to install and operate, especially in remote or northern communities. As a result, some societies faced higher operating costs after mandated fuel-source changes. Program design of the AHF, in some instance required energy upgrades before basic repairs, or funding only renewals (not redevelopments),

which led to inefficient use of limited funds. It should also be noted that complex mechanical and electrical systems are difficult to maintain in remote communities with limited technical capacity. Long-term sustainability requires simpler, durable, and locally maintainable solutions.

Recommendations

1. **Expand Program-Level Agreements:** Scale AHMA's successful pilot so that Indigenous housing authorities can allocate funds directly, with streamlined reporting to CMHC.
2. **Add Operational Support:** Integrate operating subsidies and wraparound service funding alongside capital investments.
3. **Fund Redevelopment:** Allow providers to redevelop buildings when full renovations are not cost-effective.
4. **Adapt Energy Targets:** Make sustainability requirements flexible, prioritizing health and safety first, and tailoring energy measures to local capacity and context.
5. **Strengthen Federal-Provincial Alignment:** Ensure Indigenous providers have a direct say in design and development, not just operation.
6. **Prioritize Indigenous-Led Housing:** Dedicate deeper, long-term funding streams for culturally supportive Indigenous housing off-reserve, including a standalone funding stream dedicated for urban, rural and northern Indigenous housing.

Conclusion

The AHF has made important contributions to Indigenous housing renewal, but its design and delivery limit its impact. AHMA's experience shows that when Indigenous authorities are empowered to manage funds directly, the results are faster, more culturally appropriate, and more efficient. Future federal housing programs must build on this model, integrate operational funding, and prioritize Indigenous-led solutions that address the depth of housing need among Indigenous peoples in BC and across Canada.