

**INDIGENOUS
& NORTHERN
HOUSING**

On-Reserve Residential Rehabilitation Assistance Program (RRAP)

**Booklet for Repairs
and Adaptations**



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The purpose of this guide is to help applicants determine eligibility to the program, including how to identify the required repairs or modifications. For any future RRAP projects, this document replaces any previous information on the past 5 streams of RRAP, Home Adaptations for Seniors' Independence (HASI) and Emergency Repair Program (ERP).

DISCLAIMER: The information in this guide is solely intended to assist First Nations in understanding CMHC's requirements for the delivery of the On-Reserve Renovation Programs. The information is subject to change without notice. This document is not intended to be exhaustive and should be used in conjunction with the National Housing Act, RRAP Contribution Agreement and any other policies and procedures that CMHC issues from time to time.

Introduction

The Residential Rehabilitation Assistance Program (RRAP) has been revised to include all previously offered renovation programs by CMHC for First Nations on-reserve. All suites of the RRAP (regular, persons with disabilities, conversion, rental and secondary and garden suites), the Emergency Repair Program (ERP), and the Home Adaptations for Seniors' Independence (HASI) have been combined into one program to simplify the application process and access to funding.

RRAP funding is a contribution of up to \$60,000 per unit and helps low-income households with major repairs, accessibility modifications for persons with disabilities and seniors, and the creation of affordable housing. Those who are eligible to apply are:

- First Nations for First Nation-owned properties;
- owner-occupants whose right to use is confirmed by a certificate of possession, Band Council resolution / Council resolution or other acceptable form; and
- private entrepreneurs and unsubsidized, private, non-profit corporations owning affordable rental accommodations intended to serve as the permanent accommodation for low-income tenants. A legitimate, arm's length, landlord-tenant relationship must exist. Landlords must submit proof of ownership of the property.

Each First Nation identifies priorities within their community and determines funding allocations to First Nation-owned, occupant-owned or privately owned housing.



1.0 General Requirements

1.1 Property and Occupant Eligibility Criteria

All properties must be occupied by households with a total income at or below the threshold established by CMHC based on the geographic location of the property. Proof of income need not be submitted to CMHC for all applications; however, CMHC reserves the right to request proof of the occupants' income at any time. First Nations are required to keep records of occupant income should it be requested by CMHC for any reason.

If the application is specifically for adaptations for a senior resident, the following eligibility criteria will apply:

- Be 55 years of age or older.
- Have an age-related condition or diminished ability that can be helped by one or more of the eligible adaptations.
- Lives in the home independently.
- Is a permanent resident.

For bona fide rental properties, rents must be affordable based on the location. *Consult with CMHC to establish acceptable affordable rents.*

Where a secondary or garden suite is being created, the initial incoming tenants must be a person with a disability or a senior aged 55 or older. *For more details on criteria and requirements to create additional space within existing housing, contact your CMHC representative.*

Conversion of properties may only be for existing non-residential structures being converted into affordable rental housing. *Contact your CMHC representative for more information on criteria and requirements regarding the conversion of non-residential structures.*

2.0 Eligible Repairs and Modifications

2.1 Authority Having Jurisdiction

Throughout this document, reference is made to the requirements of the “authority having jurisdiction.” Canada Mortgage and Housing Corporation shall not be considered the authority having jurisdiction.

In the absence of local authorities having jurisdiction, the requirements of the most current National Building Code of Canada (NBCC) shall apply. In all cases, where local requirements exist, the more restrictive requirement takes precedence.

Note: It is the property owner's responsibility to ensure that local requirements are met. Applicants must be made aware of this responsibility and, where applicable, must submit certificates of acceptability as required by CMHC.

2.2 “Best Buy” Principle

The principle of “best buy” shall govern all aspects of rehabilitation, including the decision to repair or replace components, and the selection of materials. Components shall not be replaced if repairs can be made at a lesser cost.

2.3 Major Repairs

To be eligible for the program, the project must be deficient and require qualifying repair, or lack basic facilities, in one of the following categories:

- Structural
- Electrical
- Plumbing
- Heating
- Heating, ventilation and air conditioning (HVAC)
- Fire safety
- Or be overcrowded, as defined by the National Occupancy Standard.

A major repair is one required to correct a serious deficiency in one of the categories above. A serious deficiency is the defective integrity of a structural component or building service or system that is obvious to the authority having jurisdiction. The deficiency is causing or will certainly cause further damage to the deficient component and adjacent or related components or jeopardize the health and safety of the occupants if it is not repaired.

All work required to bring the dwelling up to a minimum level of health and safety must be undertaken to provide a reasonable quality of structural soundness, fire safety, along with reasonable heating, plumbing and electrical quality where these systems exist or are required by the authority having jurisdiction. “Reasonable quality” shall be determined by the authority having jurisdiction.

Replacement of components which are **performing in an acceptable manner** is not eligible unless there is sufficient evidence to indicate that failure is expected within a reasonably short period of time and where failure would result in damage to other building components. Repair or replacement using program funding may then be considered.

In many older buildings, an item or component may not conform to the requirements for new construction, however, its condition and performance are acceptable, and it does not represent a hazard to the health and safety of the occupants. In such cases, the item may be considered acceptable, and its repair or replacement will not be accepted under RRAP. However, where there is a question of risk to health and safety, the authority having jurisdiction is to be consulted, and where applicable, the repairs or replacement shall be carried out in accordance with its requirements.

More information on each of the repair categories and other areas of concern can be found in [Appendix B – RRAP List of Eligible and Ineligible Work Items](#).

Note that **repairs ineligible for program assistance** include:

- basic and general maintenance items;
- mould remediation resulting from a lack of house cleaning or occupant neglect;
- work related to non-eligible units;
- work carried out prior to application submission; and
- the prorated cost of repairs to any commercial or non-residential component of housing units.

2.4 Modifications for Persons with Disabilities and Adaptations for Seniors

RRAP can help with home modifications that are intended to eliminate physical barriers, imminent life safety risks and improve the ability to meet the demands of daily living within the home. Activities of daily living include:

- approaching and getting in and out of the home;
- using doors and windows;
- controlling light, heat, ventilation and electrical systems;
- using the kitchen and bathroom;
- getting around hallways, corridors and stairways;
- accessing the bedroom, living and dining areas;
- doing the laundry;
- using closets/storage areas; and
- answering the door.

To be eligible under the program, the individual must have a permanent disability or functional limitation caused by a physical or mental impairment, or a senior with age-related loss of abilities, that restricts ability to perform the activities of daily living. Modifications and adaptations must be related to housing and/or shall provide access to permanently installed basic facilities within the dwelling.

Modifications and adaptations shall be reasonably related to the occupants’ disability or assist with daily activities within the home. If it is not evident that the modifications are related to the disability, confirmation from a qualified expert, such as a physician or physiotherapist, must be obtained. For allergies and hypersensitivities, refer to [Appendix A – Additional Information](#).

Note that supportive care, such as nursing care and special equipment required for therapeutic purposes, whether permanently fixed or not, are ineligible. Also, the home must meet minimum health and safety standards before accessibility modifications are undertaken or work to address major deficiencies may be done simultaneously.

3.0 Process

3.1 General Process for Repairs and Adaptations

An initial inspection/property review by CMHC is no longer required as part of the application for RRAP funding, but a complete work description of all eligible repairs and/or modifications must be submitted. You may use the CMHC form “RRAP Checklist for Repairs and Adaptations” or a detailed work specification from a contractor. A housing manager, technical service provider or other professional may complete the work description. Photos of items to repair or adapt do not have to be submitted with the application. However, CMHC, at its discretion, may undertake a final inspection/property review so photos must be taken prior to the start of the work in case the home(s) are selected for review.

If you need support in defining the scope of work, CMHC may organize an initial inspection or a desk review. Please advise CMHC when completing your application in the CMHC Client Portal.

Once you have received an approval letter confirming the contribution amount, you must start the work within 3 months and complete it within 12 months of the date of the approval letter (unless otherwise specified in the letter).

3.2 Special Considerations for the Conversion of Non-Residential Buildings and Creation of Secondary and Garden Suites

In addition to the general program requirements, specific documentation is required for a conversion or secondary/garden suite project:

- Building condition assessment (BCA), including preliminary cost estimates. *The cost of a BCA is an eligible expense under the RRAP program.*
- List of potential project obstacles and demonstration of how they will be addressed (for example, zoning, weather).
- Copy of the Council resolution approving the use of the site.
- Proof of financing that will cover the project costs (for example, copy of loans, grants, contributions and other equity).
- Environmental site assessment (ESA) completed by an independent professional for projects being converted to greater than six units. *The purpose of the ESA is to ensure that the non-residential property does not contain any environmental hazards (for example, petroleum or heavy metals).*
- *Impact Assessment Act (IAA) - Environmental Review Process Project Description Form. Contrary to the ESA, an assessment under the IAA takes into consideration how planned physical activities at a site, such as building construction, will impact the environment and takes into account social, health and economic factors.*
- Confirmation that:
 - incoming households will have an income below the forgiveness income limit (FIL) provided in the allocation letter;
 - rents will be affordable; and
 - incoming tenant(s) for secondary/garden suites are seniors or persons with disabilities.

Appendix A – Additional Information

1. Environmental Factors

Flood Protection Measures

Dwellings located in the fringe area of a designated two-zone floodplain **shall** conform to the flood-proofing measures of the authority having jurisdiction. Measures to reduce flood vulnerability are restricted to those that do not involve substantial structural alterations or relocation of the dwelling.

More information about flood mapping and agreements specific to provinces can be found at Environment Canada.

Note: Dwellings located in a flood way are not eligible for funding.

Lead-Based Paint

Determining the presence of lead-based paint is the responsibility of the property owner.

Where lead-based paint confirmed by acceptable means of testing is necessarily being disturbed by approved work covered under the program or represents a health concern to the occupants, special precautionary measures and cleanup **shall** be undertaken. These include the cost of materials and contracted labour, and the rental but not the purchase of specialty equipment required for precautionary measures and cleanup, such as ventilation fans, specialty respirators, and high-efficiency particle accumulators.

Note: The cost of the removal of lead-based paint and lead precautionary measures not associated with approved work is not eligible for RRAP funding.

Asbestos

Precautionary measures in accordance with the authority having jurisdiction **shall** be undertaken for the removal of asbestos where it is necessarily being disturbed because of eligible repairs, or its existing condition represents a health concern to occupants.

Contamination

Where a property qualifies for program funding and where the presence of an environmental hazard has been confirmed by an acceptable means of testing, and the hazard poses an immediate threat to the health and safety of the occupants, remedial measures **shall** be carried out in accordance with the authority having jurisdiction.

2. Moisture and Mould Problems

Identifying when mould growth results from a problem beyond the scope of regular maintenance, occupant neglect or house cleaning is the first step to ensuring a proper remediation. CMHC has numerous publications that provide valuable information in this regard. Identifying and addressing the cause of moisture and resulting mould problem remediation is the key to a complete and successful remediation. When moisture/mould growth is directly related to major repairs, such as water damage caused by leaks from plumbing pipes, roofs, walls or foundations, the corrective measures shall include remediation and cleanup of all related damage.

Where identifying the sources of moisture and related mould growth is too complex, the services of a professional indoor air quality (IAQ) investigator should be employed. Based on the findings of the IAQ professional, remediation measures related to major work items (deficiencies with the building design, structure, envelope, finishes or systems) and cleanup procedures beyond the scope of regular maintenance and house cleaning are eligible for RRAP funding.

Note: Mould resulting from a lack of house cleaning or occupant neglect is not eligible for RRAP funding.

Note: The consultation fee for an IAQ professional is eligible for RRAP funding.

Basements and attics

Required bedrooms (see National Occupancy Standard), kitchen, laundry or washroom found in mould affected basements and attics can be refinished after moisture control and remediation/cleanup measures are completed.

Note: Refinishing of mould-affected basements or attics except as stated above is not eligible for RRAP funding.

The owner must assume the risk of recontamination if they decide to refinish the basement or attic by their own means. Removal and replacement of furnishings and belongings (for example, furniture, clothes, appliances) is not eligible for RRAP funding.

NOTE: If the assessment of the house indicates that a mould problem may necessitate extensive work, the proposed renovation should be reviewed to determine whether it is cost-effective and if it will remediate the mould problem for the long term.

Available Publications

- *Mould in Housing - Information for First Nation Residents* (OPIMS 67237) should be referred to by technical service providers and provided to residents.
- *Mould in Housing - Information for First Nation Housing Managers* (OPIMS 67299) and should be referred to and provided to councils and housing department staff as a reference.
- *Mould in Housing - Information for First Nation Builders and Renovators* (OPIMS 67301) should be referenced and provided to builders, renovators and contractors undertaking any renovation work.

3. Acceptance of Existing Conditions

Older buildings can inherit certain conditions related to design that would be deemed not acceptable if built today. Examples include electrical systems, stairways and handrails. When built, they were considered acceptable. They can also have some heritage qualities today and still be found in good condition. Electrical systems in older homes often do not have enough outlets in bedrooms, however, the wiring and circuits may be in good condition and acceptable to the electrical authority. The program is not intended to upgrade older homes to meet current code requirements unless a significant health and safety concern is being addressed.

4. Structural Soundness

Structural issues exist when damage to building components, load-bearing or non-load-bearing, affects the integrity of the material resulting in a possible threat to health and safety. Examples include wood framing members exposed to moisture resulting in rot. Wood paneling, plywood, drywall, gypsum, plaster walls and ceilings exposed to excessive moisture may result in accelerated deterioration and mould growth.

5. Finishes

Siding, vinyl flooring, ceramic tiles, paint, polyurethanes and sealers are considered finishes designed to protect the structural integrity of materials that are susceptible to damage from moisture.

6. Replacement of Functioning but Deteriorated Components

Examples of functioning but deteriorated components that should be considered for replacement are masonry chimneys with deteriorated and missing mortar, and roof membranes not leaking but with evidence of substantial patching and repair, signs of aging, and brittle and curled shingles that indicate the roof has reached or exceeded its useful life. Replacement should also be considered for major components of a heating system, such as the firebox and heat exchanger, that may still be functioning, but which have had or require substantial repair. When concerns exist about the age or state of repair of an existing furnace, an inspection/assessment from a professional should be obtained. Repairs to the motor and controls, however, are considered normal maintenance.

7. Modifications for Persons with Disabilities

This is a general overview of major disability groups. There are, however, many other disabilities that are not mentioned here.

There are five major categories of disabilities that have implications for housing:

- Mobility
- Visual
- Hearing
- Cognitive
- Allergy or environmental hypersensitivity

It is important to remember that an occupant's disabling condition, or restrictions brought on by age, should be considered on a case-by-case basis and evaluated based on the impact the condition may have on the person's ability to conduct the activities of daily living in the home.

Mobility

Persons with mobility issues may have challenges with motion, walking or may not walk at all. They may have trouble standing for long periods, be able to walk only short distances and may have difficulty moving quickly. In the home, people with limited mobility may have trouble negotiating hallways and stairs and may have difficulty getting in and out of bed, on and off the toilet, and in and out of a bathtub. Some mobility issues result in reduced stamina or strength, while others may cause partial or complete paralysis.

Visual

Persons with a visual disability may have difficulty making out details in their environment, things may look foggy or they may only be able to distinguish large items. They may have difficulties such as distance vision, visual acuteness, blurring or tunnel vision. Persons who are legally blind may have some vision, sensitivity to light or have no vision at all. Some individuals may require the assistance of a guide dog and/or use braille.

Hearing

A hearing disability can range from hard of hearing to deafness. Persons who are hearing impaired may not be able to hear many sounds, especially soft ones. They may also be unable to hear low tones, high tones, or both. In the home, a person may have difficulty hearing alerts, such as a doorbell or smoke alarm. To accommodate a person who is hearing impaired, auditory signals may need to be made louder or be replaced with visual signals.

Cognitive

Persons who have diminished cognitive ability may not react quickly to surroundings, such as a hot element or sharp scissors. They may also have difficulty processing and distinguishing competing signals. A person whose cognition is diminished may have trouble recognizing dangerous situations. In the home, it is important to create a safe environment, including familiar and easy-to-recognize visual elements to assist with orientation.

Allergies or Environmental Hypersensitivity

Applicants who apply for assistance citing a disability due to environmental allergies or multiple chemical sensitivities require the following:

1. Statement verifying occupant's medical condition: Documentation from a physician identifying the occupant's medical condition. If the information is insufficient, additional documentation from an allergist, medical specialist or environmental medicine physician may be required.
2. Reasonable proof of housing condition: In exceptional cases, it may be acceptable to provide reasonable proof demonstrating that changing the housing conditions would alleviate the person's condition. For example, if an occupant has asthma or respiratory problems, or is unable to go to work or school because of illness, and a qualified building professional finds obvious signs of moisture or mould in the house

caused, for example, by a dirt floor in the basement or crawl space, assistance should be considered even without medical documentation.

Where remediation is complex or uncertain, the services of an indoor air quality professional should be obtained.

The most common allergies are triggered by dust, moulds and animal dander, but reactions can also be caused by other substances such as certain foods, metals and various chemicals. The reactions may include asthma, hay fever, eczema or flu-like symptoms. Individuals who suffer from environmental hypersensitivity experience adverse reactions to many substances not limited to the above and often include perfumes, vehicle exhaust and chemical emissions from various consumer products and building materials. They react at concentrations much lower than those detected by other people. Persons with reactions severe enough to cause breathing difficulties and physical weakness often require an environment modified to reduce the offending substances.

If the allergy or hypersensitivity is related to pets or smoking, there should be a preliminary evaluation on the presence or absence of smoking and pets that would affect rehabilitation of the dwelling.

The applicant who smokes is not eligible for funding due to an allergy or environmental hypersensitivity. Even if a non-smoker, an applicant may not qualify for assistance if it is determined that another resident is a smoker, and evidence indicates they smoke in the house. Some people who are environmentally hypersensitive may have a severe allergy to pets. It is not unusual for some people to keep pets despite a severe allergy to them. If the physician indicates an allergy to pets and recommends removal, RRAP funding cannot be provided unless the applicant resolves this issue first, before rehabilitating the house. If the cleanliness of the home is impacted by the presence of pets, then the pets must be removed from the home before any air quality remediation takes place. Each case should be assessed on its own merits.

Ventilation and Air Purification

Although portable air conditioners can exclude pollutants from outside, they also recirculate stale air and, therefore, **are not eligible** under the program.

The installation of the HRV in areas with high levels of pollution in the outside air should be evaluated carefully. The quality of the air inside the house will be limited to the quality of the outside air. All methods of controlling odours (removal of carpets, control of moisture, etc.) should be done before a ventilation system is installed.

Appendix B – RRAP List of Eligible and Ineligible Work Items

The list below presents the main eligible and ineligible repairs and adaptations for RRAP funding. This list is non-exhaustive; other work items may be eligible or ineligible for RRAP funding.

Type of Work	Eligible Work Item	Ineligible Work Item
Structural	<ul style="list-style-type: none"> • Roof leaking and needs replacement • Roof repairs required • Subfloor soft, deteriorated and unsafe • Cracked foundation • Replace windows • Replace doors • Rot damaged stairs and landings • Framing repairs • Drywall repairs (water damage) • Building envelope repairs 	<ul style="list-style-type: none"> • Old windows that are not efficient but are functional • Patching and painting walls (general repair/maintenance) • Removal, discarding, decontamination or replacement of personal belongings contaminated by mould
Electrical	<ul style="list-style-type: none"> • Electrical elements not working throughout unit • Sparks in electrical panel • Porch light or others not working • Adding outlets where there are none • Hardwire smoke/carbon monoxide detectors • Adding GFI receptacles • Replace range hood fan • Replace bathroom fan • Replace panel 	<ul style="list-style-type: none"> • House electricity needing to be upgraded to 200 amp (but still functioning) • Replacing lightbulbs
Plumbing	<ul style="list-style-type: none"> • Only toilet in house is not functioning • Septic tank flooding and needs replacement • Leaking plumbing fixtures • Defective or broken plumbing fixtures • Domestic hot water tank not working • Install sump pump 	<ul style="list-style-type: none"> • Repairing chipped sinks or tubs • Replacing outdated fixtures
Heating, Ventilation and Air Conditioning (HVAC)	<ul style="list-style-type: none"> • Broken furnace can't heat house • Condemned chimney that is unsafe for use • Replacing deteriorated flue pipes • Replacing broken electric baseboard heaters • Install HRV • Repair/maintain HRV 	<ul style="list-style-type: none"> • Installation of air conditioners
Fire Safety	<ul style="list-style-type: none"> • Adding proper/adequate fire separation • Installing smoke alarms • Installing carbon monoxide detectors • Clearances to combustible materials. (stoves and furnaces) • Means of egress (window or door) 	
Overcrowding	<ul style="list-style-type: none"> • Additional bedroom(s) to meet National Occupancy Standard 	<ul style="list-style-type: none"> • Additional bedrooms if there is no overcrowding

Type of Work	Eligible Work Item	Ineligible Work Item
Accessibility	<ul style="list-style-type: none"> • Install wheelchair ramp or lift system • Repair wheelchair ramp or lift system • Modify doorways • Modify kitchen • Modify bathroom • Install chair lift (interior) 	<ul style="list-style-type: none"> • An electronic air cleaner or electrostatic precipitator (usually installed in furnaces) • Portable air cleaners, ionizers, ozonators or other devices • Removal, discarding, decontamination or replacement of personal belongings contaminated by mould
Other	<ul style="list-style-type: none"> • Fees (including project management) and permits • Replace deteriorated flooring • Replace interior doors • Replace interior closet doors • Drywall repairs and painting • Replace kitchen cabinets • Repair kitchen cabinets • Replace countertop • Replace bathroom vanity • Repair rain gutters • Repair mould damages • Repair interior stairs • Repair basement stairs • Install handrail • Install insulation in crawl space • Install insulation in attic • Grade exterior for drainage 	<ul style="list-style-type: none"> • Replacement of furniture

Additional Resources



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70296 20231124-004