

February 8, 2019

Hon. Victor Fedeli
Minister of Finance and Chair of Cabinet
Ontario Ministry of Finance
Frost Building South, 7th Floor
7 Queen's Park Crescent
Toronto, ON M7A 1Y7

Re: Ontario Municipal Social Services Association 2019 Provincial Budget Submission

Dear Minister Fedeli,

The Ontario Municipal Social Services Association (OMSSA) is a non-profit association whose members are Ontario's Consolidated Municipal Service Managers (CMSMs) and District Social Services Administration Boards (DSSABs) represented by senior human services staff. This includes:

- 37 Consolidated Municipal Service Managers (CMSMs), or upper and single-tier municipalities across Ontario
- 10 District Social Services Administration Boards (DSSABs) in areas where no upper-tier municipality exists in Ontario's north

OMSSA values our strong partnership with the Province. In Ontario, core social services like income support, community housing, and child care and early years services are planned, managed and co-funded by municipal service system managers. Our members understand their local communities, have extensive technical expertise and offer decades of experience providing positive outcomes for people in the communities where they live.

Partnership

OMSSA has been working with the Ministry of Children, Community and Social Services on social assistance reform, social services modernization and human services integration. We have a strong relationship with the Ministry of Education and are currently working to provide input on their new child care plan. We also appreciate our relationship with the Ministry of Municipal Affairs and Housing on the housing supply action plan, community housing renewal and reducing the reporting and administrative burdens for municipalities.

In the areas of social assistance, community housing and children's services, the local level of government deserves a seat at the table. OMSSA values our partnership with the Province and looks forward to working together to achieve common objectives and positive outcomes for people in communities across Ontario.

Funding

OMSSA strongly supports the Association of Municipalities of Ontario's (AMO's) 2019 provincial budget submission, [For the People, Every Dollar Counts](#). Municipal governments collect only 9 cents of each household tax dollar, compared to 47 cents for the federal government and 44 cents for the provincial government. Ontarians pay the highest property taxes in Canada. Municipal governments are responsible for a growing list of services that people depend on. Increased federal and provincial support for municipalities is crucial, as these services cannot be sustainably funded on property tax revenue, user fees and development charges alone.

According to AMO, 280 pieces of provincial legislation directly govern municipalities and help to shape local municipal budgets. Municipal governments rely on provincial grants to provide local services and infrastructure. Provincial dollars are a critical part of the municipal financial mix. Together with federal grants, they account for 20% of municipal revenues across the sector. For many smaller municipalities, grants represent an even higher percentage of local revenue.

The municipal-provincial relationship is complex – Ontario's municipalities are required to work with multiple ministries across the provincial government. By comparison, universities deal with one ministry, hospitals deal with one ministry, and school boards deal with one ministry. Ontario's municipalities work closely with the Ministry of Municipal Affairs and Housing, but they also have reporting or financial relationships with ten others.

Ernst & Young LLP's line-by-line review of Ontario government spending found the operation of ministries through the Ontario Public Service comprised 9% of spending. Interest on debt was a further 9%. The majority of provincial spending, 82%, is dedicated to transfer payments. Provincial transfer payments are made to individuals, businesses, hospitals, universities, school boards, service agencies, boards, commissions and municipalities. In 2018, these transfer payments amounted to \$133.7 billion of provincial spending.

These transfers were a key focus of the line-by-line review. According to provincial figures, support for municipalities accounts for just \$4.2 billion of that amount. This represents 5.6% of total provincial transfer payments. Every dollar counts, and it's important to note that 8 out of 10 residents would be concerned if municipal funding reductions resulted in higher property taxes.

OMSSA encourages the Province to maintain and increase support for the municipal level of government to address the infrastructure gap and to ensure quality services in all Ontario municipalities. OMSSA members would also welcome any effort to streamline and simplify transfer payments to local government. This would reduce the administrative and reporting burdens local governments face in their relationship with the Province and allow for savings and efficiencies to be reinvested back into providing vital human services for the people of Ontario.

Equalization Payments

Ontario spends among the lowest per-capita on government services. The equalization formula should be reviewed to ensure that Ontario's taxpayers are paying for important human services within Ontario's communities where they are needed. Equalization payments cost Ontario \$12.9 billion per year and place additional pressure on the Province's deficit and ability to invest in human services. It is important for the Province to advocate for a fair share of federal funding, to ensure Ontario residents have access to vital services they depend on, regardless of where they live in Ontario. Local governments need stable and reliable long-term funding to plan and deliver human services within and for their communities.

Housing and Homelessness

In Ontario, community housing and homelessness prevention programs are co-funded, planned and administered by Ontario's 47 service system managers. The municipal level of government pays 58% of the cost of community housing, compared to 26% for the federal government and 16% for the provincial government.

OMSSA supports the Ministry of Municipal Affairs and Housing's consultations on their Housing Supply Action Plan. There has been a significant deficit in new purposed-built rental construction in recent decades. Low vacancy rates in communities across Ontario are resulting in skyrocketing rental costs for individuals and families seeking shelter.

Supply of Rental and Community Housing

OMSSA would encourage the Province to pursue any policies or initiatives designed to build new rental units and community housing units in communities across Ontario where low vacancies exist. Solutions are required to address supply across the full continuum of housing needs, including shelters, transitional and supportive housing, rent-geared-to-income (RGI) and affordable rental.

Development Charges

Factors such as land costs, interest rates, construction, materials costs, developer profits and real estate costs have led to a housing affordability crisis in parts of the province. Affordability issues go well beyond development charges. Growing communities rely on revenue from development charges to support growth with added services and infrastructure. Reducing development charges and offering property tax incentives impacts municipal revenue and places the burden of growth on existing property taxpayers. Local governments cannot reasonably or sustainably subsidize private home ownership. Allocating resources to support those in need of affordable rental and rent-geared-to-income (RGI) housing must be prioritized.

OMSSA looks forward to working with the Province on community housing renewal. Service managers understand the unique social, economic, regional and demographic forces that shape

their communities, and their strong relationships with local service providers help them deliver the right mix of housing supports with the right community partners to address specific local needs.

Key priorities for OMSSA and its members include simplifying RGI, reviewing service level standards, reducing administration and reporting, addressing outdated rent and utility scales and ensuring Ontario communities receive a fair share of federal housing funds allocated in the National Housing Strategy.

Community Housing Renewal

By 2033, all funding commitments and agreements for capital and operating expenses between the federal government and community housing providers will have expired. Roughly 40% of the housing units supported by these agreements will be non-viable once they expire, and 80% would be at-risk of not being able to operate under their current structure. Declining federal funding and lost provincial funding for community housing resulting from the cancellation of cap and trade funds for social housing repairs is putting more financial pressure on service managers. Additional financial pressure is being placed at the municipal level with the focus on development charges as a barrier to housing affordability.

Matching fund requirements poses a barrier to Ontario communities in accessing National Housing Strategy funding. Rent and Utility Scales do not reflect true costs and are not keeping pace with cost of living increases. Discrepancies in the current scales create additional costs for municipalities of more than \$200 million per year. Most of the community housing stock in Ontario is between 18 and 50 years old, and the cost to address the backlog of needed repairs is sitting at \$1.5 billion.

Housing affordability must be recognized (and funded) as a shared priority and responsibility by all three levels of government, particularly given the limits of the municipal property tax base to shoulder this responsibility. Funding should be allocated in predictable and sustainable ways, through allocation-based (rather than application-based) approaches, with flexibility to roll funding into future years, enabling long-term strategic planning to meet local needs.

Modernizing Service Level Standards should be prioritized to ensure they reflect current realities, support innovation and flexibility by recognizing the full range of approaches to achieving housing affordability, and are tied to meaningful outcomes for people and communities

Service system managers are subject to over 200 service agreements with the Province. Programmatic, application-based funding places cumbersome (and often duplicated) administrative and reporting requirements on service system managers, particularly for those with fewer staff resources or capacity. Regulatory requirements under the *Housing Services Act, 2011* around calculating and administering rent geared-to-income (RGI) housing cause unnecessary administrative burdens and complication for service system managers, housing providers, and their tenants and clients. OMSSA members applaud the Ministry's efforts to reduce

the reporting and administration burden on municipalities and look forward to continuing this work.

Intergovernmental Cooperation

Bilateral talks are currently ongoing between the Province and the federal government. Service system managers welcome the federal government's renewed commitment to housing affordability, but we need the Province to work with the federal government and service system managers to ensure that the National Housing Strategy (NHS) can achieve its goals within Ontario's unique framework. Projects are not moving forward due to the extensive application, administration and reporting burdens. Matching funds are a challenge at the municipal level. The criteria is also a barrier for smaller rural and Northern communities, whose projects would otherwise greatly benefit from these funds. Rental costs and low vacancy rates will limit the success of the Community Housing Benefit and the Portable Housing Benefit initiative already in place in Ontario.

Homelessness Services and Prevention

OMSSA supports a Housing First approach. Service managers have set priorities as guided by their local 10-Year Housing and Homelessness Plans. Reducing poverty and homelessness is a priority for all 47 service system managers. Given the large and diverse population of Ontario, local flexibility is key to ensuring solutions make sense for the unique urban, suburban, rural and Northern communities across this province.

The Community Homelessness Prevention Initiative (CHPI) funding has been crucial to supporting community-level solutions to ending and preventing homelessness. CHPI funding should be prioritized, continued and enhanced, and should support the use of longer-term housing allowances to enable high-needs individuals to effectively transition into more stable, long-term housing.

Emergency shelters are one important part of the continuum of housing supports needed to address Ontario's affordable housing crisis. In many communities across Ontario, emergency shelters are over, at, or reaching capacity

Newcomers and Asylum Seekers

Ontario's service system managers have played an important role in supporting the settlement of Syrian refugees across Ontario. The increased influx of irregular border crossing and asylum seekers, as well as the secondary migration of Syrian refugees has had a local impact on availability of housing, shelter and social services in many Ontario communities.

OMSSA members are willing to help those who require services, but in recent years there has been a significant strain on the system and local government resources. The recent funding allocated to Toronto is appreciated, but more funding and support is required to allow municipalities to serve the increasing demand caused by those looking to settle in Canada.

Newcomers deserve the resources and assistance that will allow them to succeed. A permanent and sustainable solution is required to address an issue that is putting pressure on social services and housing in many urban municipalities across Ontario. Additional federal resources are required to address this increased demand on local services. OMSSA appreciates provincial advocacy on obtaining this federal funding for impacted municipalities.

Indigenous Populations

The provincial and federal governments must adequately fund and provide access to culturally sensitive services for the Indigenous community living off reserve in Ontario communities. OMSSA supports the truth and reconciliation recommendations and the importance of providing quality services to all residents within Ontario communities. OMSSA calls on the government to consult with Indigenous organizations on issues related to poverty reduction, health, education, mental health and addictions, social assistance, child care and housing to support the Indigenous population who live on and off reserves in Ontario.

Program and Funding Integration in Collaboration with Service System Managers

Ontario's most vulnerable populations need access to supportive services in areas like health, mental health, addictions, accessibility and seniors supports to maintain their housing and their health. Recognizing the strong linkages between housing, social services and health, the Province must work towards greater funding alignment and collaboration among all relevant ministries and service managers.

Service system managers are leading the way on integrating, simplifying and streamlining service delivery at the local level, to achieve better outcomes for both clients and taxpayers. To further this work, we must integrate how social policies and programs are designed and implemented at the provincial level as well.

As experts on local housing delivery and need, service system managers must be engaged and leveraged at the outset, to ensure that provincial policy can be successfully implemented locally. OMSSA looks forward to working with the Ministry of Municipal Affairs on the housing supply action plan, rental construction and community housing renewal.

Early Years and Child Care

The Ministry of Education is moving forward with a new child care plan and is considering a refundable tax credit for child care. In Ontario, service system managers play a central role in the planning, funding, administration and operation of early years and licensed child care services.

Public investment in early years and child care has a multiplying or “ripple” effect in positive economic benefits. In Ontario, the multiplying effect of investing in child care is approximately 2.27, meaning that every dollar invested in child care results in an economic output of \$2.27. Affordable child care can help boost women's workforce participation, with significant economic

benefits. As the province with the highest child care costs, Ontario also has the lowest rate of women's workforce participation at 80.6%.

Affordability is a major challenge in Ontario when it comes to child care. Ontario has among the highest average child care fees of any Canadian province. While costs vary regionally, Ontario families are paying from \$750 to \$1,700 per month for licensed child care, totaling between \$9,000 to \$20,000+ per year for each child. These costs are rising steadily at about twice the rate of inflation.

Child Care Fee Subsidy and the Proposed Child Care Tax Credit

The child care system is primarily funded through parent fees and supported by the Ontario Child Care Subsidy program. In 2017, approximately 30 percent of children in licensed care (123,497) in Ontario received a full or partial subsidy for child care fees. The subsidy supports and enables more parents to enter and stay in the workforce and makes child care more affordable for those in need.

While the proposed child care tax credit may help some families, those with lower incomes will be unable to shoulder the upfront costs of child care. OMSSA and its members encourage the Province to consider how the tax credit and fee subsidy could work in tandem, with the fee subsidy available for lower-income earners, and a tax credit to support higher-income earners.

Access and choice are important child care priorities. OMSSA and its members believe that reviewing and modernizing the current fee subsidy framework would go a long way to supporting access and choice for parents facing the most need.

Currently, a family's income must be under \$20,000 to qualify to receive the full subsidy. This threshold has not been updated since 2005. This threshold should be increased to match the Low-Income Measure After Tax (LIM-AT) thresholds, adjusted for family size and indexed to inflation. This would help additional families experiencing the greatest need to access quality, safe and affordable child care.

Offering expanded tax rebates will help to improve affordability for some families across Ontario, but tax rebates alone will not address the pressing need to increase capacity in Ontario's child care system and will leave parents without adequate options. To address growing demand, many new licensed subsidized child care spaces are needed across Ontario, along with expanded measures to increase affordability.

Licensed and Quality Child Care

OMSSA members believe in quality child care. Licensed child care is essential to ensuring quality and protecting children's safety. The current number of licensed child care spaces across the province can accommodate less than 1 in 4 (23%) of children in Ontario from age 0-4. If spaces were available and affordable, it's estimated that 45-50% of children in this age group would be

using licensed child care. The Province should maintain its commitment to this important system and work to expand access to licensed child care services in communities across Ontario. Efforts should be made to incentivize unlicensed child care providers to become licensed.

Funding Stability and Flexibility for Early Years and Child Care

To achieve our shared goals of quality, affordability, access and choice, the Province should consider predictable and indexed, multi-year operational funding, in one early years and child care funding envelope, to expand system capacity to meet local needs. Funding should be based on a consistent and equitable formula that reflects the true costs of local services. Capital expansion funding to increase capacity and address the growing demand for licensed child care in communities across Ontario. Where the need is greatest, special attention should be paid to sustainable child care programs in smaller and rural communities, as well as infant care.

Funding allocations should be grounded in an understanding of unique regional and local needs, giving service system managers flexibility on how funds can be allocated and when. Service system managers are best-positioned to make decisions on local priorities and needs, and stable, flexible funding will allow them to plan for and meet those needs over the long-term.

Reporting and Administrative Burdens

The Province should work with service system managers to remove unnecessary administrative and reporting burdens, and to support investments in technology to improve and streamline these processes, freeing up needed resources to better serve children and families. Service system managers must be able to operate in a flexible framework, that allows them to use the right mix of approaches to address unique local needs and circumstances. This is especially true in rural and northern communities, where geographic spread and distance presents challenges.

Cross-System Collaboration and Coordination

OMSSA and its members encourage the Province to work to improve collaboration with school boards to leverage existing buildings and land for the expansion of early years and child care services across Ontario, as well as integrated service delivery sites, and before and after school programs. Rental and cost recovery fees for the use of these assets for child care services should be eliminated. These assets are already funded by public dollars and requiring municipalities to pay these fees amounts to a double bill for taxpayers. OMSSA members strongly support all-day kindergarten and encourage the government to maintain the program for the benefit of parents and children across Ontario.

ECE Recruitment and Retention

Recruiting and retaining Early Childhood Educators (ECEs) presents a major challenge to the viability of Ontario's Child and Family Centres. Unlike in other provinces, Early Childhood Education is a regulated profession in Ontario. ECEs are essential to ensuring a high-quality early years and child care system and are not compensated fairly or competitively for the important work they do. The Province should provide consistent, indexed funding to support competitive and

appropriate wages to enable ECE recruitment and retention across the entire early years and child care system in Ontario.

Service System Management of Child Care and Early Years Services

Service system managers develop local early years and child care service plans to meet their communities' long-term needs, in coordination with school boards and local service providers. Service system managers play a key role in oversight, by ensuring that local early years and child care services and service providers meet a high standard of quality and safety.

OMSSA members are responsible for the delivery of Ontario's Child Care Fee Subsidy program, Special Needs Resourcing (SNR) and Ontario's Child and Family Centres. They can also leverage other municipal services and expertise, in areas like public health, libraries, recreation, economic development, transportation, poverty reduction, newcomer settlement and others, to strengthen and support their work. Their work is furthered by the strong relationships they have built with school boards, child welfare agencies and service providers in their communities. These connections – along with their ongoing work to integrate and streamline the delivery of all human services at the local level – help to reduce duplication, ensure quality, and respect Ontario's taxpayers.

For Ontario to achieve the vision of a high-quality, accessible, affordable and inclusive early years and child care system that is flexible and able to meet the unique local needs of each community, service system managers must continue to play a central role. OMSSA members look forward to working with the Ministry on the development of their upcoming child care plan.

Social Assistance and Employment Support

Social services management was downloaded to municipalities by the Province in 1998. OMSSA applauds provincial cost uploading that has happened since to support the delivery of services. Social assistance program costs that were previously paid for through the local property tax base and municipal budgets have recently been uploaded. The upload agreement reached full maturity in 2018. According to AMO, for every dollar of provincial upload value, municipalities have invested \$1.67 back into infrastructure.

Social Assistance Rates

A single Ontario Works recipient currently receives \$9,604 per year, which is well below any standard measure of poverty or low income. Increasingly, low-income Ontarians are turning to services like food banks to meet basic needs, with food bank usage up by 6% since 2008. The economic costs of poverty have been well-documented. In Ontario, it is estimated that poverty costs \$32 to \$38 billion per year – or \$2,300 per year per household. OMSSA appreciates MCCSS moving forward with a 1.5% rate increase for Ontario Works and Ontario Disability Support Program (ODSP) clients. To address poverty reduction, social assistance rates must keep pace with inflation and the true cost of living in Ontario.

Social Assistance Reform and Employment Supports

OMSSA appreciates the opportunity to consult on the Province's social assistance reform plan, as well as to support and contribute to the valuable work that was undertaken by the multi-stakeholder Income Security Reform Working Group. Service system managers support reducing administration to allow caseworkers to spend more of their time supporting and working with people who need it most.

Efforts to simplify rules and increase local flexibility are welcome. For years, service system managers have supported and are working on human services integration within their local communities. OMSSA also supports integrated service delivery sites to enable individuals to have access to multiple services in a single location. Many OMSSA members look forward to taking on more responsibility in helping individuals improve employment outcomes through service system management of Employment Ontario services. Any changes to administration funding should provide enough notice for service managers to properly plan and adjust accordingly.

For Ontario to achieve the vision of an effective, accessible and efficient system of income and employment supports that meets local needs and allows our communities to prosper, service system managers must continue to play a central role. OMSSA and its members look forward to working together with the provincial government towards integrated human service delivery and improved outcomes in employment, income security and poverty reduction.

Human Services Integration and Technology

OMSSA supports the work of Ontario's Human Services Integration Office and believes efficiencies can be found while improving the experience for individuals entitled to local services. Service system managers have been working on human services integration locally and are well-positioned to share best practices.

Unfortunately, barriers such as privacy legislation and multiple, incompatible software programs have slowed progress. Integration of technology would improve data collection, reduce reporting burdens and increase the amount of time human services staff can dedicate to working directly with individuals in need. While municipalities are working on integration, OMSSA encourages better integration among provincial Ministries to help reduce the administrative and reporting burden on service system managers. This is especially true for the Ministry of Health and Long-Term care, as there is a direct link between social services and the social determinants of health.

OMSSA values provincial initiatives related to human services integration, modernization and reducing the reporting burden on municipalities, and looks forward to working together to achieve positive outcomes and efficiencies through improved technology and efforts to modernize Ontario's human services systems.

Mental Health

OMSSA and its members welcome the Province's commitment to investing \$1.9 billion in mental health services supports over the next ten years. The federal government should match these funds to address gaps in the system for those seeking mental health supports. These services are integral to achieving better income, employment, homelessness prevention and poverty reduction outcomes in communities across Ontario. Municipal costs in this area are staggering, particularly when associated justice, hospital and social costs are considered.

To address wait times and a lack of services, investments must be made to ensure mental health and addictions services are available in all Ontario communities. Service system managers are ready to play an increased role to ensure individuals have access to these services in the communities where they live.

Opioid Crisis

The opioid crisis has had a significant impact on large and small communities across Ontario and has become an urgent problem provincially and across Canada. Methamphetamines, fentanyl and other drugs are having a major impact on communities across Ontario as well. Resources are needed to support those with addictions and provide the treatment to those who need it in the community where they live. A coordinated strategy involving all levels of government is needed to save lives and address this urgent crisis hurting Ontario communities.

Paramedic and Emergency Services

There is a cost-sharing arrangement between provincial and municipal governments on land ambulances. Increased calls and costs for emergency services is putting a strain on local governments to fund these vital services. OMSSA calls on the Province to review the funding formula to reflect true costs and to upload additional costs to support municipalities with police, fire and emergency services costs. OMSSA has concerns with rising costs resulting from arbitration decisions and asks that a municipality's ability to pay be factored into these arbitration decisions. OMSSA would also like to see expansion of the paramedicine program currently funded by the Ministry of Health to additional communities.

Transportation, Broadband and Infrastructure

Transportation is vital to all communities in Ontario. Urban, suburban, rural and Northern communities have unique needs that require solutions to ensure that people have access to services, the ability to get to work and improved quality of life through quicker commute times.

As we move forward with social services modernization and take advantage of new technologies, broadband will be vital to all communities in Ontario. Integrated service delivery sites are an efficient way to deliver a range of services to the people in a single place. Multiple services pooled

within a single location leads to increased efficiency in service delivery and improves client experience. Social services must be accessible, and it makes sense for the Province to invest in innovative social infrastructure to support this.

Long Term Care and Seniors Services

Ontario's aging population has led to local challenges in providing accessible supportive services for seniors. The number of seniors in Ontario will double between 2016 and 2041 from 2.3 million to 4.6 million, representing a quarter of the province's population. Wait times for long-term care can range from months to years, and the system is not keeping up with demand. Investments are required in both seniors housing and long-term care. The 30,000 new long-term care beds this government has promised are urgently needed to help end hallway health care. OMSSA supports the related recommendations made in AdvantAge Ontario's 2019 provincial budget submission, [*The Challenge of a Generation: Meeting the Needs of Ontario's Seniors*](#).

Regional Government Review and DSSAB Review

OMSSA encourages the Province to consult with Ontario's service system managers impacted by the regional government review and DSSAB review. Service system managers are a critical part of the fabric of local and regional government and offer an important perspective as the Province reviews regional, county and DSSAB governance in Ontario. Local flexibility and service system management is essential to the delivery of housing and social services to Ontario's most vulnerable residents. Service system managers take their legislative responsibilities seriously and our proud of the important human services work they are doing to support the most vulnerable residents in their communities. On the DSSAB review, OMSSA supports the work and recommendations of the Northern Ontario Service Deliverers Association (NOSDA).

Truth and Reconciliation

OMSSA members support inclusive and culturally-sensitive human services to support Ontario's Indigenous populations. It is important to have equality in access and quality of human services. OMSSA supports funding for the development of comprehensive Indigenous engagement plans. We call on the Province to allow for relationship building, without time constraints, between municipalities and local Indigenous groups.

OMSSA supports Truth and Reconciliation and strong partnerships and consultation with organizations such as the Ontario Federation of Indigenous Friendship Centres (OFIFC) and Ontario Native Welfare Administrators Association (ONWAA). It is important that all levels of government move forward on the Truth and Reconciliation recommendations.

Investing in People Makes Sense

A recent study in the Canadian Medical Association Journal found that from 1981-2011, average per capita health spending was almost three times higher than per capita social services spending. The study suggested that if governments had spent one more cent on social services for every dollar spent on health, life expectancy could have increased by another 5% and avoidable mortality could have dropped an additional 3%. There is a direct link between social services and health outcomes.

OMSSA understands the fiscal situation the Province is facing with the current deficit and debt. Service system managers are ready to partner with the Province to ensure we can maintain and enhance social services that Ontarians rely on while improving efficiencies through integration, modernization and reducing administrative burdens.

Ontario's service system managers bring more than 20 years' experience in outcomes-focused, integrated social services delivery to the table, and they know their communities best. Service system managers must be engaged and leveraged as partners in the design of social policy and programs, from the outset. This is especially true when the municipality is funding the program.

Program design must have the flexibility to account for the unique circumstances and challenges of urban, rural, suburban, large, small, remote and northern communities, rather than employing a one-size-fits-all approach. To expand and maintain quality human services in Ontario, local communities require adequate consistent long-term funding.

Thank you very much for the opportunity to provide feedback and input for consideration. We wish you and Ministry officials all the best with crafting the upcoming 2019 Ontario budget.

Sincerely,



Elaine Baxter-Trahair
President



Doug Ball
Executive Director