



November 29, 2019

Ontario Digital Service
Ministry of Government and Consumer Services
595 Bay Street, 10th floor
Toronto, ON M7A 2C7

Sent to: digital.government@ontario.ca

Re: Ontario Data Strategy

Dear Minister Thompson,

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). Our members are made up of human services staff working at the municipal level of government.

In Ontario, core social services such as social assistance and employment services, early years and child care services, and community housing and homelessness programs are planned, managed and co-funded by municipal Service System Managers. Ontario is the only jurisdiction in Canada where municipal levels of government hold responsibility for human services.

The Province of Ontario has requested consultation on three discussion papers related to the Ontario Data Strategy. Topics of discussion include "promoting public trust and confidence," "creating economic benefits" and "enabling better, smarter, more efficient government."

OMSSA and its members are most interested in the discussion paper related to "enabling better, smarter, more efficient government," but support the initiatives outlined in each of the discussion papers. It makes sense to explore new opportunities for data use across Ontario and to protect people's data rights from growing risks. A strategic approach to data collection, usage, sharing and governance is essential in today's data-driven society and is long overdue.

OMSSA members are responsible for 10-year housing and homelessness plans, early years and child care service system plans and other planning related to human services. Municipal human services departments and DSSABs increasingly collaborate with partners in the health, education and justice sectors. OMSSA's members support and are working towards increased human services integration in local communities across Ontario.

CMSMs and DSSABs are required to report extensively to the Province. Often, the data and information collected is not shared back with local governments. OMSSA strongly encourages



increased information sharing with the municipal level of government as part of the Ontario Data Strategy initiative. Sharing of information with municipal governments and DSSABs will improve research, policy development and budget cycle planning, as well as improve outcomes for clients.

The Ontario Data Strategy should also allow flexibility for local analysis, recognizing that sometimes data does not tell the entire story. Ontario's service system managers must be empowered to make local decisions based on their in-depth knowledge and experience within their local communities. The Province has passed the *Simpler, Faster, Better Services Act* and has created a Chief Digital and Data Officer to oversee this work. OMSSA supports the principles outlined in this legislation and considers the requirements it sets out to be reasonable, **provided that the requirements are cost neutral for municipal governments.**

Local Human Services Context:

Across human services programs, clients would benefit from increased information sharing among different programs and departments. This reduces the need for the client to fill out multiple applications, or to tell their story multiple times. It also ensures that they are aware of the full range of benefits to which they are entitled.

Privacy legislation remains a barrier to information sharing at the municipal level, as well as between Ontario Ministries. Most human service departments rely on privacy consent waivers to address this issue, but unfortunately, many barriers remain. Silos also exist among Ministries responsible for these different programs.

The Ontario Data Strategy supports human services integration and provides a good opportunity for better local decision making, planning, policy alignment and information sharing between departments and ministries. It would assist with budgeting and finding efficiencies at the local level. Integrated technology is important to sharing information and reducing reporting and administration burdens for municipalities, allowing more time to be freed up for client-focused work, leading to better outcomes in areas such as life stabilization and employment.

The Ontario Data Strategy could also enable a client-centred focus across multiple programs, to better track outcomes across jurisdictional boundaries. Information sharing between Ontario Works and Employment Ontario is a persistent area that could benefit significantly from greater technology integration and information sharing. Sharing information collected by the Ministry of Education and the Ministry of Health with municipalities would also be helpful in supporting stronger local decision-making.

OMSSA would be happy to share a list of detailed and specific requests for data tables and information directly impacting social assistance, housing and child care as part of the consultation process.

How can government make its open data most useful and helpful for Ontarians?

- Ensure municipalities have access to a robust open data site with effective search functionality
- Ensure datasets have clear, simple “data dictionaries” and robust metadata
- Beyond open data, provide open analysis tools (e.g., interactive maps, dashboards)
- Ensure government has policies that encourage open data sharing, where possible
- Create mechanisms for the public and community agencies to easily request data and ensure staff have capacity to provide quick response to inquiries
- Use community priorities to guide what data is made open (e.g., housing, transit, climate change)

How can the government best inform citizens about our new investments and developments to support data sharing and data linking?

- Provide regular updates to interested users through a data newsletter (auto or curated) when new data is added (eg. Stats Canada’s regular email newsletters)
- Hold public meetings to build local knowledge and capacity on what data is available, how to use open data, and to gain local feedback

What barriers exist in the government that you’re aware of that limit the sharing of data?

- Reduce and simplify data sharing agreements, including clarifying legal obligations (to reduce fear of lawsuits for inappropriate sharing), clarifying the data “owner” for each system, and clarifying what municipalities may share
- Create Application Programming Interfaces (APIs) for municipalities to sync provincial systems with local reporting tools
- Provide resources for open analysis tools as well as open data (e.g., interactive maps, dashboards)

Supporting Municipalities to Support the Ontario Data Strategy:

The Province wants to unlock the value of government data by building the data skills and capabilities of Ontario government employees and promoting the use of data-driven technologies. The same should be considered for municipal employees to better understand, manage, collect, store and utilize data to inform policy, planning and service provision at the local level on par with the Province.

OMSSA requests that the Province consider allocating resources to assist municipal governments with training and technology upgrades to support this work. Many of Ontario's municipal governments are leaders in open data, but some may require additional expertise and support. Furthermore, open data portals can be expensive to maintain. Support from the Province will be necessary to ensure that municipal governments can participate in the data strategy without creating additional strain on staff resources, municipal budgets and the property taxpayer.

Data Security and Broadband Support:

Additional resources may also be required to support security requirements to protect against threats that could put data at risk. Cybersecurity is a priority for local governments, but also results in significant costs to stay up to date with current threats and emerging risks. The Province should also consider adopting international best practices, such as those adopted by the European Union, who are advanced when it comes to the protection of data and information sharing within government.

The lack of access to fast and reliable broadband internet is also a barrier, particularly in rural and Northern municipalities. The Ontario Data Strategy should consider this and continue to work with the federal government to expand broadband access across the province.

Positive Provincial Government Modernization, Digitization and Integration Efforts:

OMSSA is encouraged by recent developments in modernizing and digitizing governments. Some of these positive initiatives include: the transfer payments modernization process; piloting MyBenefits for social assistance clients; the data interactive tool for ODSP and Ontario Works clients; Electronic Document Management and other projects presented at the recent Directors Administrators Reference Group (DARG) Annual General Meeting. OMSSA continues to work with and support the Human Services Integration Office. Service Managers are encouraged by the desire to better share information and further integration among the Province's 23 Ministries, much like OMSSA members are working to achieve locally. It is our hope that the Ontario Data Strategy will further build on this work to reduce reporting burdens, improve information sharing and provide for a better client experience.



OMSSA supports the overall direction of the proposed Ontario Data Strategy as outlined within the three discussion papers released by the Province. OMSSA and its members encourage the Province to move forward with the strategy, with consideration for additional resources to assist municipal governments with training and implementation locally.

OMSSA supports reducing privacy barriers while maintaining a balance to protect data security. OMSSA encourages continued consultation with municipal governments and their municipal associations (OMSSA, AMO, NOSDA, MFOA, AMCTO, ROMA, etc.) as the strategy progresses towards its next phase. The Association of Municipalities of Ontario's (AMO) Digital Government Task Force is a logical place to focus these efforts with a broad view of municipal government beyond human services.

OMSSA appreciates the opportunity to provide feedback on the Ontario Data Strategy and looks forward to continuing to work with the Province on data sharing, human services integration, social services modernization, integrating technology, digitization of government, streamlining transfer payments, improving income verification processes, enabling digital signatures and reducing reporting administration burdens on local government. Together, these initiatives will improve human services outcomes for people and help enable better, smarter, more efficient government at the local level.

Sincerely,

Doug Ball
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