

Sent via e-mail: sylvia.jones@ontario.ca

December 11, 2023

The Honourable Sylvia Jones
Minister of Health
College Park, 5th Floor
777 Bay Street
Toronto, Ontario M7A 2J3

Dear Minister Jones:

On behalf of the Association of Municipalities of Ontario, I am writing to provide our early feedback on the voluntary merger process. AMO is supportive of voluntary mergers with incentives, as requested through the modernization consultation process in 2020. AMO appreciates the engagement with your Ministry officials and the ongoing opportunity to provide advice and work together towards success.

AMO's Board has considered the matter and has re-affirmed our recognition of the need for action and investment to enhance public health service delivery and population health outcomes. There are, however, many questions about the government's intentions and concerns about the merger process from our municipal members.

In discussion with yourself and your officials, we believe that the process outlined by the government is consistent with the principles listed below. A confirmation of your commitment to these principles could address uncertainties, dispel concerns and help to support the success of the process:

1. Mergers will be truly voluntary, rather than directed, and make sense for the communities served.
2. Mergers will be supported by adequate resources and incentives that fully cover the actual transition costs of mergers, including the merger of different unionized labour forces, technology systems, and support for Indigenous engagement and participation.
3. Additional municipal costs will not be incurred during the merger process or result in more municipal investments to cover increased operational and capital costs for local public health agencies after mergers.
4. Mergers are not a provincial cost savings exercise, but rather will allow local public health agencies to reinvest any savings from administrative efficiencies into front-line services.

5. Existing service levels will be maintained, so that areas do not lose services and become underserved.
6. The minimum population threshold of 500,000 residents will be treated as an aspirational target to move closer to, with a focus on outcome improvements, rather than an absolute requirement.
7. As 'one size does not fit all', factors beyond population size will be considered, especially in rural and northern areas, if significant population health outcome improvements reasonably are likely to result. Factors will include, but not be limited to, considerations of geography and populations served.
8. Implementation plans and timelines are not expected be 'one size fits all' and will reflect the individual needs and circumstances of communities and current local public health boards.
9. Implementation will be a complex and lengthy process. Municipalities are not expected to have all of the answers by March 31, 2024. This step will be the beginning of a conversation with the province regarding what makes sense for each local public health agency.
10. Mechanisms will be put in place that ensure appropriate representation across all municipalities within a public health agency service area, consistent with the 'say for pay' principle.
11. Mechanisms will be put in place to ensure appropriate Indigenous representation, determined locally in consultation with First Nations communities, Inuit, Metis, and Indigenous People living within municipal boundaries.
12. The administrative burden, including reporting requirements, for local public health agencies will not increase.

There is an opportunity for proactive communications to clarify these matters and address concerns with municipal associations and councils, beyond the elected officials on Boards of Health. Municipalities welcomed open and frank discussion with ministry officials at the AMO Health Transformation Task Force. We are pleased to be collaborating with Ministry staff and the Association of Local Public Health Agencies to deliver a webinar to support this engagement. The concurrent session at the ROMA conference in January will be another good opportunity. AMO will be pleased to share your response to this letter with our membership to continue to address ongoing questions and concerns. We look forward to ongoing collaboration with your officials to identify additional opportunities for municipal engagement.

AMO, alpha, and the Province working together will help achieve a stronger public health system. We trust that our feedback is helpful and will be duly considered. AMO staff are available to answer any questions of clarification and provide advice regarding communications to the municipal sector.

Sincerely,



Colin Best
President
Association of Municipalities of Ontario

cc: Paul Calandra, Minister of Municipal Affairs and Housing
Martha Greenberg, Deputy Minister, Ministry of Municipal Affairs and Housing
Dr. Catherine Zahn, Deputy Minister, Ministry of Health
Dr. Kieran Moore, Chief Medical Officer of Health, Ministry of Health
Elizabeth Walker, Executive Lead, Office of the Medical Officer of Health, Ministry of Health
Dr. Charles Gardner, President, Association of Local Public Health Agencies
Loretta Ryan, Executive Director, Association of Local Public Health Agencies