

AMO Submission on Proposed New Regulation under the *Connecting Care Act, 2019*

PROPOSAL NUMBER 24-HLTC007

April 8, 2024

Executive Summary

The Association of Municipalities of Ontario (AMO) is a non-partisan, non-profit association representing 444 municipal governments from across the province. Municipal governments work through AMO to achieve shared goals and meet common challenges. As the frontline order of government closest to people, municipal governments are deeply invested in Ontario's health system and understand the health needs of local communities.

AMO is committed to supporting the work of Ontario Health Teams (OHTs) to improve the health of Ontario residents. This submission outlines the context of our ongoing work to demonstrate the value of municipal participation in OHTs and outlines the case for strengthening the current proposed regulations by emphasizing the importance of a municipal role in OHTs. We also outline our perspective on remaining issues to be resolved ahead of OHTs reaching full maturity. AMO appreciates your consideration of these recommendations and looks forward to continuing our work with the Ministry of Health and Ontario Health to strengthen OHTs.

Context

AMO has consistently advocated for municipal governments to have a meaningful and appropriate decision-making role in health systems planning including in our 2019 discussion paper [Partners for a Healthy Ontario](#). Integration of municipalities into Ontario Health Teams has been inconsistent across the province. In 2021, AMO worked with Ontario Health to assess the status of municipal involvement with OHTs and identified the value proposition for including municipalities and District Social Service Administration Boards (DSSABs) in OHTs. AMO's 2021 submission [Municipal Engagement with Ontario Health Teams](#) outlined recommendations to the Ministry of Health that would improve and standardize the relationship between OHTs, municipal governments, and DSSABs.

In 2022, AMO was made aware that several OHTs had requested funding from municipal governments, public health units, and municipal services (e.g., paramedic services, long-term care homes) for their 2022/23 operating budgets. AMO provided a [letter](#) to the Minister stating that these requests were unacceptable. We appreciate that guidance was provided by the Ministry that these requests are not appropriate, and we encourage the Ministry to continue to emphasize this message.

AMO also appreciates the Ministry of Health's 2022 guidance in [Ontario Health Teams: The Path Forward](#) that encouraged municipal engagement in OHTs. While we believe that there is more work to be done to include municipal involvement in all OHTs across the province, AMO is encouraged by the progress of the Ministry of Health's work on OHTs and is pleased to respond to this regulatory proposal with additional recommendations and feedback.

The Importance of a Municipal Role in Ontario Health Teams

Municipal involvement in health systems includes direct, legislated funding and service delivery, including public health, long-term care, paramedic services, and supportive housing. In addition, municipalities also contribute indirect and sometimes voluntary efforts to address local gaps in health services. Municipal service delivery also contributes to the social determinants of health and population health overall as there are numerous municipal services that contribute to the

health outcomes of residents, including housing, parks and recreation, transit, community safety and well-being, among others.

Increasingly, municipal governments are facing challenges in ensuring sufficient access to health services. It has become harder to attract and retain an adequate healthcare workforce in municipal health services as well as the broader health sector. Ensuring communities have sufficient access to health services, including primary care is a growing concern for local elected officials who are hearing from their residents about this issue and who are eager to be engaged in solutions to ensure the health of their communities.

AMO is supportive of the not-for-profit structure proposed in these new regulations. This structure aligns with AMO's recommendations for clear governance and accountability standards for OHTs. This structure is a practical opportunity for OHTs to involve municipalities. AMO recommends that municipal and DSSAB representatives should have a seat on these new not-for-profit corporations because they can bring real value in coordinating across municipally delivered programs. These include municipal health services but also the human services such as housing, social assistance, and others that support the overall health of individuals and the population.

We have heard from our members that while some OHTs understand the benefit that municipal engagement can bring and are actively and successfully engaging with municipalities, others do not fully understand the important role that municipalities play. AMO recommends that the Ministry of Health and Ontario Health should undertake additional education campaigns that would inform OHTs that do not currently partner with municipalities or DSSABs about the best practices and benefits of municipal engagement. This education can build on AMO's 2021 work with Ontario Health and can emphasize the benefits of engagement including innovation and integration with social services through sharing best practices from successful municipal partnerships with OHTs across the province.

Considerations for Full Maturity

As the Ministry considers how OHTs will evolve towards full maturity, AMO reiterates the importance of direct relationship between municipalities and the province. As an order of government, it remains important for provincial funding to continue to flow to municipalities rather than through a not-for-profit corporation. It is essential that direct government-to-government funding relationships should still be maintained. Clarity is needed on these issues sooner rather than later and AMO is willing to work with the Ministry of Health on the development of an appropriate funding model for OHTs and municipal health services as progress towards full maturity evolves.

Municipalities are created by the Province of Ontario to be responsible and accountable governments with respect to matters within their jurisdiction. Subject to more than 100 provincial statutes, municipalities already have robust accountability mechanisms in place. For example, the *Municipal Affairs Act* provides oversight mechanisms such as powers of investigation and the power to make an inquiry into the affairs of a municipality, amongst others.

As OHTs are designated and become subject to ministerial powers under the *Connecting Care Act, 2019* (e.g., to appoint a supervisor or investigator), the Ministry of Health should consider regulatory options for excluding municipal governments, just as long-term care homes and hospitals were excluded in the legislation.

Conclusion

Overall, AMO is supportive of the proposed regulations, and we encourage the Ministry of Health to incorporate our above recommendations to strengthen OHTs through municipal involvement. AMO continues to recommend that municipal engagement should be required for OHTs moving forward. AMO also recommends that the Ministry of Health engage in consultation on the role of Indigenous organizations within OHTs. AMO looks forward to continuing to work with the Ministry of Health and Ontario Health on the appropriate role and relationship for municipalities and OHTs and we welcome the Ministry to consult with AMO through our Health Transformation Task Force and the MOU table.