

Sent via e-mail: [Minister.MAH@ontario.ca](mailto:Minister.MAH@ontario.ca)

May 25, 2016

The Honourable Ted McMeekin  
Minister of Municipal Affairs and Housing  
College Park  
17th Floor  
777 Bay Street  
Toronto, ON M5G2E5

Dear Minister McMeekin:

I am writing as a follow-up to AMO's submission on the proposed regulatory changes under the *Housing Services Act, 2011*. Specifically, I am writing to emphasize our very serious concerns with the proposal to prescribe in regulation certain Service Manager decisions for reviews as requested by housing providers under Section 157 of the Act.

As stated strongly in our submission, AMO does not support further regulation in this area as it is not appropriate or necessary. In fact, we believe that Section 157 should be revoked from the Act. It is neither appropriate or necessary.

It is not appropriate as municipal Service System Managers need the ability to manage their housing portfolios in a fiscally responsible manner to be accountable to municipal councils and District Social Service Administration Boards, and to safeguard the existing housing units available in the system. Most importantly, as a matter of principle, it will serve to undermine the authority of municipal Councils and DSSAB Boards to make decisions, usurping their authority under the *Municipal Act* and the *District Social Services Administration Boards Act*.

It is not necessary as the Act already contains safeguards for housing providers with recourse to the courts, and with the Ontario Ombudsman. It could potentially involve a fiscal impact to municipal governments in cases where appeals are successful as Service System Managers hold the contingent liability with respect to the housing provider's obligations. An outside body should not determine that a Service Manager must consent to actions that might place it at risk.

Further, deliberation of this change at this point in time is premature. If not willing to revoke the section from the Act, the Ministry should at least defer a decision on further regulation as it is pre-empting its own legislatively mandated review of enforcement provisions (sections 82-99) under Section 100 of the Act scheduled for January 1, 2017.

Such a review should consider how successfully the enforcement provisions in the Act balance the powers of the Service System Manager to effectively administer the housing programs in its service areas, with the authority of the housing provider to manage its properties and, whether additional review provisions are warranted.

I am available to speak with you further on this matter.

Yours truly,



Gary McNamara  
AMO President

cc: Laurie LeBlanc, Deputy Minister, Ministry of Municipal Affairs and Housing  
Janet Hope, Assistant Deputy Minister, Ministry of Municipal Affairs and  
Housing, Housing Division  
Iain Angus, Chair, Northern Ontario Service Deliverers Association  
Keith Palmer, President, Ontario Municipal Social Service Association  
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