



February 27th, 2023

Rich Donovan
Independent Review of the
Accessibility for Ontarians with Disabilities Act (AODA)

Sent via attachment: <https://www.aodareview4.com/feedback>

Dear Rich Donovan:

Re: AMCTO's endorsement of the AMO Submission to the Fourth Independent Review of the AODA

I am writing on behalf of the Association of Municipal Managers, Clerks and Treasurers of Ontario (AMCTO).

AMCTO represents excellence in local government management and leadership. With 2,100+ members (e.g. CAOs, Clerks, Treasurers, management) working in municipalities across the province, AMCTO is Ontario's largest association of local government professionals, the leading professional development organization for municipal professionals and recognized as an influential voice on key management and legislative issues affecting the sector.

For over 80 years, AMCTO has maintained a productive relationship with government by helping ensure the professional expertise and local understanding of our members is utilized to improve existing and/or new legislation, policy and programs.

On November 29 2022, AMO made a submission to the Review.

As a member of AMO's Accessibility Task Force which helped inform the submission, AMCTO had the opportunity to provide feedback and comments from the municipal professional perspective on the challenges and opportunities with AODA and improvements that could be made to provide better service and outcomes to persons with disabilities.

At the February 24th, 2023 Board of Directors meeting, we had the opportunity to review and discuss the submission formally. I am pleased to share that the Board approved the endorsement of AMO's submission.

We are in agreement with the recommendations made and echo AMO's introductory comments that the goal is to improve municipal ability and capacity to meet the objectives of the Act while improving the Act's effectiveness.

We would also like to draw your attention to an issue our members raised with regard to the implementation of the Province's land use planning and development legislation, that speaks directly to the recommendation on guidelines and resources for compliance:

Section 29 of the AODA provides that Accessibility Advisory Committees shall review site plans and drawings. This important step requires time to ensure documents are accessible, time to seek advice and review, consider and make recommended changes, and bring items forward for council approval. Yet, because of legislated changes to local planning processes municipalities may be penalized for approvals which do not meet certain timelines.

This is but one recent example of where Provincial legislation, regulations and processes make it more challenging to implement the AODA locally and where municipal professionals must figure out a way to balance compliance without guidance.

We appreciate the opportunity to provide input to the review and look forward to reading the results of your review.

If you have any questions or concerns, please reach out to David Arbuckle, Executive Director (darbuckle@amcto.com).

Yours Truly,



Elana Arthurs, CMO, AOMC
President, AMCTO

Cc: Hon. Raymond Cho, Minister for Seniors and Accessibility
Nancy Matthews, Deputy Minister for Seniors and Accessibility
Colin Best, President, Association of Municipalities of Ontario