







**Customer Service Standards Review
Consultation**

February 2025

Association of Municipal
Managers, Clerks and
Treasurers of Ontario

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Introduction

The [Association of Municipal Managers, Clerks and Treasurers of Ontario \(AMCTO\)](#) thanks the Committee for the opportunity to comment on the proposed recommendations for updating the Customer Service Standards and looks forward to further discussion and consultation from the Government of Ontario through the regulatory registry once the Ministry of Seniors and Accessibility has had an opportunity to review the Committee's final comments..

AMCTO represents excellence in local government, management, and leadership. For over 85 years we have provided advocacy, education, accreditation, leadership, and management expertise for Ontario municipal professionals. With 2,200+ members working in municipalities across the province, we are Ontario's largest association of local government professionals.

AMCTO supports efforts to make improvements to the AODA and the IASR to better serve Ontario's communities and persons with disabilities. As we have emphasized in the past, these improvements must also take into consideration limitations to municipal financial resources and capacity as well as the leadership role the Province must take in providing support in the form of funding, training, and capacity building. This leadership role should also come with legislative and regulatory clarity and guidance that outline how municipal statutory responsibilities fit together particularly in areas where there appears to be diverging approaches. We are happy to see the Committee has recognized the need for the Province to take on this leadership role.

AMCTO appreciates that the Committee has called for the development of toolkits and guidance material to support organizations in meeting their obligations. We further agree that additional clarity is always beneficial when it comes to assisting with compliance and updating the language in the Standard to equity is a better way to address the different needs of customers and is in line with the Ontario Human Rights Code.

As a member of AMO's Accessibility Task Force which helped inform [a submission](#) to the 4th Independent Review of the AODA, AMCTO provided feedback and comments from the municipal professional perspective on the challenges and opportunities with AODA including improvements to make to provide better service and outcomes to persons with disabilities.

The comments and recommendations from that submission, and Mr. Donovan's own Final Report remain relevant to the review of the Customer Service Standards.

We recognize that ensuring accessible customer service is a societal responsibility, one that must be resolved to by all orders of government, by private businesses, and by residents of our communities working together. Municipalities and their staff do the best they

can with the limited staffing and financial resources at their disposal, but they cannot do this important work alone and they cannot fund these potential initiatives alone either. It will require Provincial commitment to the development of tools, training and provision of funding to support implementation.

We are supportive of the intent of the recommendations. However, there are areas where we would recommend the Committee reconsider to account for operational feasibility. We note the fiscal constraints on municipal budgets and the differing levels of capacity and resources from municipality to municipality can impact service delivery. For instance, many municipalities may not have a dedicated Accessibility Coordinator resource. Municipalities have on average 6 full-time administrative staff with dozens of statutory and operational responsibilities and tasks to oversee and administer. This context is important when considering new and augmented Customer Service Standards.

Below are our comments by recommendation.

Recommendation 1: establishment of accessibility policies

We agree that regular review of policies is a best practice. This ensures that these are “fit for purpose” and respond to service needs and obligations. We also agree that best practice could include reviewing existing bylaws and policies where appropriate to ensure they reflect IASR requirements for complementary and integrated updates.

However, it is unclear what an annual review for large organizations and every two for smaller ones is meant to achieve, particularly if standards have not changed. Operationally, this would mean that policies and bylaws would be in a constant state of review and implementation. A two-year cycle does not provide adequate time to review said policies, consult with accessibility advisory committees and departments on policies and bylaws and seek internal administration and/or council approvals and then ensure that these are implemented.

A more practical approach may be to suggest that these be reviewed every 4-5 years which would also generally align with new council terms. Otherwise, this would take away from our ability to create more meaningful changes for people with disabilities and improve accessibility in communities. However, some municipalities have their own procedures and schedules for policy review.

We agree that the Province should provide more guidance on key areas that can be evaluated for policy-based barriers, as these may be systemic in nature and therefore harder to identify. Such guidance would support making meaningful changes to policies/procedures/bylaws to address real barriers for people with disabilities.

The development of templates and tools help level the playing field between municipalities which have different levels of internal capacity and would provide a consistent baseline to across the province for more common approaches to service delivery. We would suggest however, that these templates offer enough flexibility for municipalities to go beyond the templates where there may be capacity to do so.

While moving towards a more accessible society and offering a statement of commitment in support of offering accessible goods, services and facilities is something we can all agree is a worthy goal, we would caution that there are a number of factors that may prevent organizations from being able to completely affirm that they can guarantee “barrier free” services and may therefore not be a practicable ask.

For instance, making improvements to historical buildings where accessible features may not be possible or practical, or where a business lacks the control over the space that they lease means that an organization cannot commit to being barrier-free. A statement of commitment that addresses what an organization is able to do when facilities or services are not completely barrier-free would keep momentum moving towards better service delivery as they would still be required to take measures to improve accessibility.

Recommendation 2: Accessible training

Increasing training and information on compliance is an important way to ensure that businesses and other organizations are aware of their obligations. We would suggest that this dissemination occur at a provincial level as not all municipalities require business licenses. It may be beneficial to investigate whether existing modules and resources exist and where they may, ensure that these are disseminated through various channels.

With respect to the mandatory training sub-recommendation, AMCTO’s understanding is that whenever policies are updated, organizations must provide updated training. Therefore, additional clarity may be need in this recommendation on the intention of the Committee. Is it that the Committee believes that refresher training on accessible customer service should be made mandatory or is there a different intention?

Recommendation 3: Accessibility Plans

Multi-Year Accessibility Plans (MYAPs) are important tools for ensuring that organizations prevent and remove barriers and meet requirements of the regulations. AMCTO agrees that the Province should develop guidance templates and tools to assist organizations in developing MYAPs. The Province should also be curating and sharing best practices from across organizations and sectors on how organizations can improve to their Plans and internal strategies including sharing information on how to measure and track commitments, how organizations respond to feedback and how to implement these strategies etcetera.

We do not agree with the recommendation to update the MYAP every four years instead of every 5 years. There are opportunities to align updates to policies and procedures with updates to the MYAP and as we noted above, and we believe that these should be done with regularity. In that spirit, the current timing aligns with council terms which is an important consideration for municipalities. As we have noted previously, staffing capacity and resourcing is an issue for many municipalities, requiring more frequent updates means additional operational strain and administrative burden.

Recommendation 4: Feedback Process Required

AMCTO supports these recommendations. While many organizations may already prioritize responses based on severity, providing more explicit direction may be beneficial as a shared best practice and developing more tools and guidance to assist organizations in setting up an accessible feedback intake and response process would be appreciated.

Recommendation 5: Format of documents

The recommendations in this section have merit. However, further clarity is needed particularly as there could be significant costs incurred depending on implementation. Clarity on scope and application are needed with respect to delivering ASL/LSQ for emergency-related information especially when interpreters may not be available to each municipality. We would want to avoid situations where the recommendations unintentionally prevent organizations from sharing certain emergency information in a timely manner because they cannot locate an interpreter. Additional clarity on whether LSQ be required for all public organizations or only in areas with a French language minority population as defined by the municipality would also be helpful.

Recommendation 6: procuring or acquiring goods, services or facilities.

AMCTO agrees that more authoritative guidance is needed in the procurement requirement. It would be helpful to ensure that organizations implement accessible procurement requirements and ensure organizations incorporate Inclusion, Diversity, Equity and Accessibility (IDEA) principles. We also agree that universal accessibility/design in procurement programs should be encouraged as accessibility should never be considered “optional”. However, we must also caution that there must be some flexibility to adapt these where it is feasible to do so as there are complexities to public sector procurement and significant cost implications as well.

Municipalities are often thought to have “significant resources” when in reality municipalities are faced with significant budgetary constraints with limited revenue sources that do not grow with the economy and ever-increasing requirements to provide programs and services that were not meant to be supported by the property tax base. Certainly, creating new products or services is not within the ability of many municipal organizations.

Public sector procurement is complex with numerous reporting and administrative requirements. Adding more requirements could make this process longer and add administrative burdens. Organizations should be encouraged to report back on how accessibility is built into processes and thoughtfully included into projects, requiring procurement reporting as part of the Multi-Year Accessibility Plans and statistics is impractical. Accessibility should be meaningfully incorporated into procurement processes but recommendations need to consider the limitations of municipal fiscal realities and the complexity of existing processes.

Recommendation 7: notice of temporary disruptions

AMCTO is in general agreement with what is proposed in this section as long as the Province provides more authoritative guidance on how to comply with the proposed recommendations. This should include how to treat planned versus unplanned disruptions, including direction on updating notices as new information becomes available. As we noted previously, the Province should be developing and sharing best practices more generally and not just specifically to notices of disruption to assist organizations with compliance.

Recommendation 8: self-service kiosks

AMCTO agrees with the recommendations. We would note however, the Design of Public Spaces (DOPS) currently lacks detailed specifications in many requirements and there are a number of areas where more guidance and information are needed to help support implementation. One example that we have heard from our members is around service counters which we understand must be an accessible height yet dimensions have not been provided. Moreover, the interaction between DOPS and other legislation can be complicated. In our response to the DOPS consultation in 2024, we highlighted the need for more guidance and resources on the interconnectivity of IASR and other legislative obligations.

Recommendation 9: the use of service animals

AMCTO agrees that obligated organizations need additional training tools or toolkits to train staff especially with scenarios to help organizations understand where exceptions or conflicts may arise and include more information on uncommon “service animals”. The recommendation of educational resources with respect to the interplay of AODA, the OHRC and other laws is one that AMCTO has raised previously and is greatly needed. Additionally, clarity on protocols or guidance for managing service animals which are untrained and may behave inappropriately given other legal obligations of municipalities is necessary.

Recommendation 10: the use of support persons

AMCTO agrees with the intent of the recommendations, however it should be noted that even with reasonable requests, an organization may not be able to provide in-person ASL/LSQ interpreters because of lack of availability, scheduling conflicts or other scenarios. There may be more opportunities with technology to provide interpreters through a virtual platform. We would recommend amending this recommendation to ensure that virtual service provision options are acceptable.

We have also heard concerns about the use of the term “reasonable request” and would recommend clearly language on what this means. Moreover, additional guidance on how to accommodate persons with disabilities, with an intersectional lens would be appreciated by municipalities and other obligated organizations. We do not agree with sub-recommendation 6 as it will cause municipalities and other organizations operational and financial difficulty. This recommendation does not account for the many complex, nuanced situations that occur when people with disabilities access goods and services and the unintended consequences that such a blanket recommendation could cause.

Recommendation 11: purpose, application and definitions; scope and interpretation

AMCTO agrees with proposals to align definitions and ensure harmonization with other legislation. While AMCTO understands that emotional-support service animals would still be covered in existing definitions of service animals, AMCTO supports bringing added clarity to the standards.

A Note on Artificial Intelligence

A sub-recommendation of Recommendation 6 on procurement states that: “The Ontario government to study the utilization of artificial intelligence and its implications for accessibility standards.”

We would suggest that the use and implications of AI for accessibility and the various standards be a stand-alone recommendation, as there could be implications beyond procurement. AMCTO has been actively engaging the Ministry of Public and Business Service Delivery with respect to Bill 194, *Strengthening Cyber Security and Building Trust in the Public Sector Act, 2024*, which among other things, enacts the Enhancing Digital Security and Trust Act. The Act begins to define artificial intelligence systems. There needs to be a whole of government analysis and review of implications of the deployment and use of AI on a range of services and programs, including implications for privacy. We would encourage the Committee to recommend to the Ministry for Seniors and Accessibility that it should work with other ministries to understand the wide range of applications, uses, opportunities and risks associated with AI.



Conclusion

AMCTO appreciates the Committee's work to bring clarity and additional guidance and tools to assist organizations such as municipalities with more authoritative support to provide improved customer service to persons with disabilities. We look forward to additional opportunities to engage the Committee and Province on updates to these standards as we all continue the important work of making Ontario more accessible and improving service delivery for all Ontarians.