

2021 Annual Report of the Auditor General
Value for Money Audit: Homelessness

Report to Standing Committee on Public Accounts (SCOPA)
Ministry of Municipal Affairs and Housing

AG Recommendation	Ministry Response included in the AG Report	Ministry Update for SCOPA
Overall Conclusion Our audit concluded that the Ministry does not have an overarching strategy that effectively co-ordinates actions for the reduction of homelessness with other provincial ministries, municipalities, and other third-party service providers. The Ministry also does not collect sufficient province-wide information or perform required analysis to determine whether program goals have been met, and whether it has made any progress in preventing and reducing homelessness, particularly against its 2016 goal to eliminate chronic homelessness by 2025. When it did attempt to collect province-wide information on homelessness through an enumeration in 2018, the methodology used resulted in inconsistent data that limited its usefulness. Further, the Ministry has not taken a lead in coordinating policy, guidance and implementation of programs to help people leaving provincial institutions, including correctional institutions, health-care facilities, and the child welfare system, to avoid entering homelessness, despite acknowledging that many people will be homeless when they leave these institutions. The Ministry's method for allocating funding through its largest homelessness program, the Community Homelessness Prevention Initiative, is not based on population need, but rather follows historical funding levels and is also based on outdated Statistics Canada data. This has created unfairness in amounts provided to the 47 municipalities across the province. Further, where funding was intended to be provided based on business cases submitted by the municipalities in 2017 for the Home for Good program, there was no justification for why five municipalities (Kingston, Windsor, Wellington, County of Grey, and London) were not selected to receive funding	Overall Ministry Response The Ministry of Municipal Affairs and Housing thanks the Auditor General for this report and looks forward to working with other ministries and municipal partners to implement the audit recommendations and make further progress in preventing and reducing homelessness. As the primary funder of homelessness programs in Ontario, the provincial government plays a central role in preventing and reducing homelessness across Ontario. The Ministry takes this role seriously, and is working closely with municipal partners and with the Canadian Alliance to End Homelessness to better understand the issues that contribute to homelessness and to better connect people with local housing and supports that respond to their needs. This includes: • improving data collection through the 2021 point-in-time counts and By-Name Lists to better understand the needs of people experiencing homelessness and connect them to services and supports that address their needs; and • working closely with partner ministries on a comprehensive multi-ministry review to identify improvements to Ontario's supportive housing systems. We look forward to building on this work in partnership with service managers to strengthen local Housing and Homelessness Plans and continue to make further progress in addressing, preventing and reducing homelessness.	As noted in the ministry response in fall 2021, the provincial government plays a central role in preventing and reducing homelessness across Ontario. Since the release of the Auditor General's report, the ministry has taken a number of significant steps to make further progress in preventing and reducing homelessness. Firstly, building on the government's comprehensive review of supportive housing programs, several key homelessness prevention and supportive housing programs will be consolidated into one flexible new Homelessness Prevention Program (HPP), beginning April 1, 2022. The new HPP will simplify and streamline program administration and provide \$24.7 million in additional funding that brings Ontario's total yearly investment in homelessness programs for municipal service managers close to \$464 million - almost half a billion dollars. The HPP will address a number of recommendations in the Auditor General's value-for-money audit of homelessness in the first year of implementation and provide a foundation for further improvements on which the ministry intends to consult over the coming year. Key recommendations addressed by the new program in the immediate term include: • Improving data collection and outcomes monitoring: As a condition of the HPP, Service Managers must maintain their By-Name List in accordance with Ontario requirements and report on key performance measures. A set of outcome measures, informed in part by recently established By-Name Lists have been developed to monitor and track provincial progress in preventing, addressing and reducing homelessness, including chronic homelessness. • Allocating funding according to updated indicators of need: As a first step towards a larger review of the funding model, data from the most recent census

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since 2017 despite scoring higher on the established criteria than others that did receive funding. The Ministry lacks information about whether funding is used by municipalities for its intended purposes, what programming is delivered, and how effective the programming has been in contributing to positive housing outcomes for people receiving services and supports. Municipalities did not have processes in place to determine whether people most in need of housing placements are the first to receive them. In general, municipalities also did not have effective processes to monitor third-party service providers and did not have sufficient consolidated information confirming whether people who are homeless are provided needed supports and services. We also found that some municipalities did not have established standards for shelter operations and were not sufficiently performing inspections of shelters to ensure health and safety standards were being met. Our audit also found that municipalities' and Indigenous Program Administrators' management of contracts with third parties did not always adhere to provincial practices as outlined in the Transfer Payment Accountability Directive, such as establishing and monitoring service targets for programs delivered by third parties.		available (2016) was used to allocate the additional funding of \$24.7M in 2022-23. Building on this work, the ministry intends to consult with stakeholders as part of a funding model review to take place over the coming year on broader changes to update the allocation of funding under the new HPP, while balancing the need for planning stability. • Clarifying service categories: New service categories have been introduced, including specific activities under each category to better clarify and differentiate for reporting purposes. • Documenting funding decisions: HPP funding decisions have been provided in a fair manner and all decisions have been documented. In addition to the launch of the HPP, the ministry is also enhancing its Indigenous Supportive Housing Program beginning April 1, 2022 with an additional \$6.7 million, bringing the total annual investment in supportive housing and other supports for Indigenous people to \$30 million in 2022-23. This includes annual funding of \$10 million to support mental health and addictions services for Indigenous communities.

Update on MMAH's action plans and timetable for addressing the Auditor's concerns

Rec omm enda tion	AG's Recommendation	Ministry Response included in the AG Report	Action Plans (Steps to be Taken to Support Implementation)	Estimated Implementation Date (Month & Year)
1.	To take a more co-ordinated and cohesive action-oriented approach to preventing and reducing homelessness in Ontario, we recommend that the Ministry of Municipal Affairs and Housing take a lead role, in collaboration with other ministries that fund or directly provide services and supports to people who are homeless or are at risk of homelessness, in developing a provincial strategy with specific actions, targets, and timelines to collectively aim to address the issues that contribute to homelessness.	The Ministry accepts this recommendation and will continue to work with partner ministries across government and sector stakeholders to develop a strategy aimed at preventing and reducing homelessness. This work will build on local Housing and Homelessness Plans, leveraging the implementation of By Name Lists and the multi-ministry review of supportive housing.	As noted above, a key step since the release of the Auditor General's report in fall 2021 is the creation of the new Homelessness Prevention Program (HPP). The additional funding and program flexibility, coupled with enhanced outcomes measures and requirement to maintain By-Name Lists, will support the government in further developing its strategy to prevent and reduce homelessness, working with other ministries and with municipal service manager partners. Benefiting from the data and funding provided through the HPP, a key next step will be to support municipal service managers in developing ten-year Housing and Homelessness Plans. The next cycle of Housing and Homelessness Plans are due to be effective January 2024 (submitted for Ministry review 90 days prior).	Ongoing. Data and funding resulting from the implementation of the new HPP will be used to inform further actions to address and prevent homelessness, particularly the development of ten-year Housing and Homelessness Plans, effective January 2024.
2.	To better measure homelessness, track progress to inform whether initiatives are reducing homelessness, and to continually identify best practices for implementation, we recommend that the Ministry of Municipal Affairs and Housing: • update the work done in 2015 by the Expert Advisory Panel on Homelessness and implement all unfulfilled recommendations; and • develop specific actions for service delivery to address identified root causes of homelessness.	The Ministry accepts this recommendation and is taking immediate steps to better measure homelessness and address its root causes informed by the recommendations of the Expert Advisory Panel on homelessness. By-Name Lists, which are being implemented by all service managers by the end of 2021, will provide more current data to track progress in addressing homelessness within communities across the province. This information will further be supported by enumeration, which is required to be completed by December 15, 2021. Both the By-Name Lists and the enumeration will provide information about transitions into homelessness, helping to develop specific actions to address the root causes of homelessness.	As a condition of the HPP, Service Managers must maintain their By-Name List in accordance with Ontario requirements and report on key performance measures. A set of outcome measures, informed in part by recently established By-Name Lists have been developed to monitor and track provincial progress in preventing, addressing and reducing homelessness, including chronic homelessness. This data will support Service Managers in developing Housing and Homelessness Plans due to the ministry in 2024 and support the ministry in implementing the outstanding recommendations of the Expert Advisory Panel on Homelessness.	The implementation of enhanced outcomes measurement has been completed as a result of the new HPP in April 2022.

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		Under the Multi-Ministry Supportive Housing Initiative, the Ministry is working to consolidate its homelessness programs to improve effectiveness, efficiency and outcomes for people. The Ministry will consult on additional targets and indicators to monitor service managers' progress in addressing homelessness. As well, additional provincial indicators will be implemented to track progress on preventing and ending homelessness as part of regular reporting under the consolidated approach. The Ministry will engage with the ministries of Health; Children, Community and Social Services; Solicitor General; and Attorney General in this ongoing work, as well as opportunities to reflect related actions like equity assessments, as well as indicators, targets and other priority items in service managers' 2024 Housing and Homelessness plans.		
3.	To reduce and prevent homelessness following transitions from provincial institutions and service systems such as corrections, health, and child welfare, we recommend that the Ministry of Municipal Affairs and Housing, in collaboration with the Ministry of the Solicitor General, the Ministry of Health, and the Ministry of Children, Community and Social Services: • identify necessary data about people in provincial institutions who will not have stable housing available upon their transition, to use in assessing the extent of the homelessness issue and inform future policy decisions;	The Ministry accepts this recommendation and will continue to implement all the actions recommended. Supportive housing is widely considered a key element in addressing homelessness. The ministries of Municipal Affairs and Housing; Children, Community and Social Services; and Health have been working closely together on a comprehensive multi-ministry review to identify improvements to Ontario's supportive housing systems. As part of this work, we have been engaging across a wide variety of sectors and ministries to support better transitions for people as they leave other systems and settings – like hospitals, corrections, and child welfare. Through this multi-ministry approach we will continue to work on connecting people to the most appropriate housing options during these	The ministries of Municipal Affairs and Housing, Health, and Children, Community and Social Services are proceeding with the following initiatives regarding supportive housing: 1. Develop a common pre-screening approach that can be utilized across sectors to navigate people towards the right housing and supports. 2. Establish local integrated supportive housing planning requirements to coordinate local service planning and delivery of supportive housing across the housing, health and community services sectors. This would improve collaboration, and better respond to clients' complex needs.	This recommendation could take place as early as April 2024, pending the outcome of Service Manager engagement and implementation.

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	• where the data is not being collected, work with the relevant ministry to collect the data; • establish processes to have accommodation in an appropriate setting immediately available for people transitioning from provincial institutions and service systems; and • where effective practices are observed (for example, the initiative undertaken by the University Health Network and the Targeted Engagement and Diversion program) share and apply lessons learned with other municipalities.	critical transition periods – including collecting the data needed to support better transition planning across systems.	3. Conduct a cost avoidance review of supportive housing to better understand how supportive housing can avoid unnecessary use of high-cost provincial systems (e.g., hospitals and correctional facilities). a. MMAH has procured KPMG LLP to conduct the cost avoidance review. The final report from KPMG is due spring 2022, which will include a cost-benefit analysis of supportive housing.	
4.	To provide placement for people most in need of housing supports, we recommend the Ministry of Municipal Affairs and Housing: • require that municipalities have a consistent, fair, effective and documented process in place to prioritize people in need of housing and accompanying supports, based on assessed need; and • confirm that municipalities are following their documented process and people are being housed according to level of assessed need.	The Ministry accepts this recommendation. By-Name Lists can be used to support better connections between people and the services they need. The service manager guidelines on By-Name List implementation encourages service managers to develop criteria and procedures for making decisions about who should be prioritized for housing and services first. The Ministry will continue working with service managers to put in place appropriate procedures to prioritize people in need of housing supports based on assessed needs, and ensure they are being followed. In addition, the Ministry is actively examining how to improve the way households access various forms of housing assistance and how they can be better connected with the supports they need.	By-Name Lists were implemented in 2021-22 and are an ongoing requirement of the new HPP. The ministry will continue to work with Service Managers on how they are and could be using their By-Name List to support prioritization of programs and services locally and to support continuous improvement.	This recommendation could take place as early as April 2024, pending the outcome of Service Manager engagement and implementation.
5.	In order to better inform policy and decision-making with respect to funding and the level and type of services needed, and to provide timely and cost-effective services, we recommend the Ministry of	The Ministry accepts this recommendation and recognizes the importance of connecting vulnerable individuals with the supports they need. The Ministry will engage with service manager partners and with the provincial Information and	The ministry will continue to work with Service Managers on how they are or could be using their By-Name List to support prioritization of programs and services locally and to support continuous	This recommendation could take place as early as April 2024,

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	Municipal Affairs and Housing require municipalities, in combination with shelters operated with the use of provincial funding to: • track the types of supports required for people staying in shelters in a way that will allow for systemic analysis; • record whether people referred for services attended the referral; and • track the length of time it takes for an individual referred for support to receive those supports.	Privacy Commissioner on next steps to better track information about the services that people on the By-Name List need and use. These next steps will build on progress to date in the implementation of By-Name Lists. The province requires service managers to update information on their By-Name List every three months for priority groups to help match people with the right services and supports, as they become available. Regularly updated information can help service managers understand changes in needs, how people move in and out of homelessness over time, and other key indicators.	improvement. The ministry intends to consult municipal service managers over the coming year to review and consider the information collected on the By-Name List and changes that may be needed to better track referrals to services and supports.	pending the outcome of Service Manager engagement and implementation.
6.	To protect the health and safety of residents and staff in homeless shelters, we recommend that the Ministry of Municipal Affairs and Housing: • develop and issue provincial shelter standards required to be complied with by all municipalities and their third-party service providers; • require municipalities to conduct periodic surprise inspections of shelters, including offsite and temporary shelter locations; and • require municipalities to consolidate and provide the number and results of inspections conducted to the Ministry, summarized in a manner that can inform future homelessness funding and shelter policy development.	The Ministry accepts this recommendation and will engage with service managers and other delivery partners on the concept of shelter standards and inspections as part of next steps to better monitor and address the effectiveness, efficiency, and outcomes of homelessness programs.	The ministry intends to consult municipal service managers on the topic of shelter standards and inspections over the coming year and will develop next steps informed by the consultation.	This recommendation could take place as early as April 2024, pending the outcome of Service Manager engagement and implementation.
7.	To fairly allocate funding to municipalities based on need, we recommend the Ministry of Municipal Affairs and Housing:	The Ministry agrees with this recommendation. The Ministry is committed to undertaking a review of the CHPI funding model methodology to more equitably allocate funds based on current local need. This review will include revisiting the options	The ministry is re-evaluating its funding model as part of the work to consolidate CHPI, HFG and SCRSP into the new Homelessness Prevention Program (HPP). As a key initial step in allocating funding according to	This recommendation could take place as early as April 2024,

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	• revisit the options identified in past funding reviews and re-evaluate its funding model for the Community Homelessness Prevention Initiative; • implement changes to the funding model; and • use the latest census data from Statistics Canada to recalculate the current funding allocation under the Community Homelessness Prevention Initiative.	identified in past funding reviews, including replacing the outdated historical program spending component and using more updated data. The Ministry will consult with service managers before implementing funding model changes impacting CHPI funding allocations.	updated indicators of need, data from the most recent census available (2016) was used to allocate the additional funding of \$24.7M in 2022-23 under the new HPP. Approximately half was allocated based on Deep Core Housing Need, while the other half was allocated based on the Provincial Priorities Indicator component of the former CHPI program. Building on this work, the ministry intends to consult with stakeholders as part of a funding model review to take place over the coming year on broader changes to update the allocation of funding under the new HPP, while balancing the need for planning stability.	pending the outcome of Service Manager engagement and implementation.
8.	To provide funding to grant recipients in an objective and transparent manner based on submitted applications, we recommend that the Ministry of Municipal Affairs and Housing: • include fully documented rationales for all final funding decisions; and • follow the Transfer Payment Accountability Directive in selecting grant recipients.	The Ministry agrees with this recommendation and will ensure that a rationale for funding decisions is fully documented and in compliance with the Transfer Payment Accountability Directive.	The Ministry documents its rationale for final funding decisions and is committed to following the TPAD in selecting recipients.	Completed
9.	To have consistent and meaningful reporting on the use of provincial funding information, we recommend that the Ministry of Municipal Affairs and Housing: • develop distinct service categories; and • provide specific guidance to municipalities and Indigenous Program Administrators on how to classify program costs according to their defined service categories.	The Ministry agrees with this recommendation. The Ministry will better clarify and differentiate the categories of services, and guide service managers and Indigenous Program Administrators on how to classify their program expenditures through future program materials.	The Ministry has introduced revised service categories in 2022-23 as part of the implementation of the consolidated Homelessness Prevention Program and the updated Indigenous Supportive Housing Program guidelines. Specific spending activities have been identified for each service category. Details and guidance are provided in the HPP/ISHP Program Guidelines	To be completed April 2022.

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10.	To gain assurance that provincial homelessness funding is being used appropriately and effectively, we recommend that the Ministry of Municipal Affairs and Housing require municipalities and Indigenous Program Administrators to develop and implement processes to verify that funding provided to third parties for service delivery is being used in accordance with the province's Transfer Payment Accountability Directive.	The Ministry agrees with this recommendation and will work with service managers and Indigenous Program Administrators to develop and implement processes to verify that funding provided to local agencies is consistent with the Transfer Payment Accountability Directive.	The Ministry intends to consult with Service Managers and Indigenous Program Administrators in the coming year to progressively develop and implement enhanced accountability measures for homelessness programs.	This recommendation could take place as early as April 2024, pending the outcome of Service Manager engagement and implementation.
11.	To better understand changes in the growth, distribution and demographics of homelessness both provincially and at the municipal level, and to better direct policy toward the specific groups experiencing homelessness and the underlying reasons causing their homelessness, we recommend that the Ministry of Municipal Affairs and Housing: • use data obtained through the enumeration process to begin in 2021, to set a baseline for the periodic assessment of progress toward reducing chronic homelessness; • establish and require municipalities to track common performance indicators aimed at measuring the root causes of homelessness and priority groups experiencing homelessness, as recommended by the Expert Panel on Homelessness; and • develop and set targets for common performance indicators to be reported on by all municipalities in their Housing and Homelessness Plans.	The Ministry agrees with this recommendation. Service managers are required to enumerate using a Point in Time count and develop a By Name List by the end of 2021. Both activities will support a baseline to support continuous improvement. Under the Multi-Ministry Supportive Housing Initiative, the Ministry is working to consolidate its homelessness programs to improve effectiveness, efficiency, and outcomes for people. The Ministry will review performance indicators and consult on additional targets and indicators to monitor service managers' progress in addressing homelessness and its root causes. The Ministry will work with service managers to identify how to incorporate the findings of the Auditor General into updated Housing and Homelessness Plans required under the <i>Housing Services Act</i> in 2024.	As a condition of Ontario's new Homelessness Prevention Program (HPP) funding requirements, Service Managers must maintain their By-Name List in accordance with Ontario requirements and report on key performance measures. A set of outcome measures, informed in part by recently established By-Name Lists have been developed to monitor and track provincial progress in preventing, addressing and reducing homelessness, including chronic homelessness and youth experiencing homelessness. 2021 data collected through enumeration and from By-Name Lists will be used as a baseline to track progress in reducing chronic homelessness over time. This data will be used to inform the development of 10-year Housing and Homelessness Plans, which are due to be effective January 2024 (submitted for Ministry review 90 days prior). The Ministry would need to provide direction to Service Managers at least one year prior to the submission deadline.	Data from By-Name Lists and new HPP will be used to inform the development of ten-year Housing and Homelessness Plans, effective January 2024.
12.	To sufficiently monitor and assess the quality of homelessness services and support provided by municipalities, we recommend that the Ministry of	The Ministry agrees with this recommendation. As part of its work to consolidate its homelessness programs, the Ministry is reviewing program performance indicators to improve	Under the new HPP, service managers will be required to track and report annually on standard outcome indicators measuring success for those accessing	The new HPP outcome and performance

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	Municipal Affairs and Housing, in collaboration with municipalities: • develop standard, required indicators that measure standard, defined outcomes for those accessing the services funded through provincial homelessness programs, and report on them annually; • require municipalities to report at a consolidated level, standard, defined outcomes of individuals receiving services and supports on a unique basis; • establish a process to effectively validate the accuracy of data used in the standard, defined indicators; and • use the information reported to identify provincial and regional trends in services and regions that require further focus and support.	effectiveness, efficiency and outcomes for people. This work will also consider process improvements to effectively validate the accuracy of data based on the clarified data definitions and will support annual provincial and regional trend analyses on the data to identify areas that require additional support or focus for continuous improvement.	supports and services funded by the program. Reporting requirements for the new consolidated provincial homelessness program will include a requirement to report relevant indicators based on unique Households assisted. The Ministry intends to validate the data submitted by service managers as part of their annual indicator reporting under the new consolidated homelessness prevention program, including querying and requiring explanation of inconsistent or missing data. The reported information will be analyzed by the Ministry to identify trends, including changing use of different services and differences in regional need and success in addressing homelessness.	indicator reporting requirements are to be implemented by Service Managers starting April 2022.

2021 Annual Report of the Auditor General
Value for Money Audit: Land Use Planning

Report to Standing Committee on Public Accounts (SCOPA)
Ministry of Municipal Affairs and Housing

AG Recommendation	Ministry Response included in the AG Report	Ministry Response to the Value-for-Money Audit: Land Use Planning
Overall Conclusion Our audit concluded that the Ministry of Municipal Affairs and Housing (Ministry) does not have effective procedures and systems in place to ensure that land-use planning in the Greater Golden Horseshoe is consistent with good land-use planning practices, the purposes and objectives of the Planning Act, and the Growth Plan for the GGH. Ontario's land-use planning laws and provincial plans are, for the most part, consistent with those established elsewhere in Canada. However, numerous changes to Growth Plan policies have created instability in the planning process. They challenge municipalities' ability to implement provincial policies in their local plans. In addition, the Province's frequent use of MZOs creates inconsistencies and an actual or perceived unfairness concerning how policy is applied. Recently the Province expanded its power to override local authority, legislating increased powers to MZOs and is using them much more frequently. Also, importantly, our audit found that opportunities remain for land-use planning to be better integrated with planning processes for infrastructure and services, such as highways, transit, schools, and hospitals. Since 2015 the Ministry has not measured or reported on the effectiveness of land-use planning for achieving key goals of the Growth Plan. Ontarians need to know how well land development is meeting the current and future needs of communities and the people who live in them, while safeguarding valuable resources such as agricultural lands, wetlands, forests, and distinctive natural features and landscapes.	Overall Ministry Response The Ministry thanks the Auditor General for her recommendations. The Ministry recognizes the critical role it holds to ensure effective land-use planning policies are in place. The Ministry continues to work with other ministries and municipalities as we improve Ontario's planning system. This includes streamlining decisions to enable development of critical projects, in particular to respond to the impacts of the COVID-19 pandemic and to increase the supply and affordability of housing. As part of this work, on September 20, 2021, land-use planning functions across the Ministry were re-aligned into a new Planning and Growth Division (PGD) in order to integrate land-use and development-related policy functions into a single division with a clear mandate and a focus on enhanced stakeholder relationships. This new division brings together the Ministry's entire growth, land-use planning and buildings policy continuum. In addition, the work supporting municipal Growth Plan conformity in land-use planning has been integrated into the Central Region Municipal Services Office. These changes will enable the Ministry to better support municipalities as they work to implement provincial policies and plans, and as we address the Auditor's recommendations. The Ministry looks forward to sharing our continued progress with the Auditor General in the coming years.	The Ministry has continued its efforts to address various recommendations put forward by the Auditor General. Some actions have already been taken, with more work underway. <i>Growth Plan for the Greater Golden Horseshoe</i> • As noted by the Auditor General in the report, the Ministry has commenced work to update and publicly report on the results for each Growth Plan performance indicator. The Ministry is continuing to work on reviewing and revising the existing performance indicators. • The Ministry intends to continue to encourage municipalities to engage early and frequently as they work through the municipal comprehensive review to identify any issues or challenges with meeting the objectives of the Growth Plan. • In 2023, building on work to update and report on updated performance indicators, as noted above, the Ministry intends to engage with internal and external stakeholders to standardize methodologies and develop ongoing data collection strategies. • The Ministry has continued work on collecting the information necessary to support monitoring and reporting on how the objectives of the Growth Plan are being met. • The approach includes securing long-term data licence agreements to facilitate the timely and ongoing release of updated indicators, collecting data as authorized under the Growth Plan, and partnering with internal and external stakeholders. <i>Engagement</i> • The Ministry is continuing to work closely with GGH municipalities to provide timely support, appropriate guidance, and direction throughout the conformity

AG Recommendation	Ministry Response included in the AG Report	Ministry Response to the Value-for-Money Audit: Land Use Planning
		process, and is having ongoing discussions/meetings as needed with municipalities at appropriate intervals to provide needed technical support and input. • In 2022, the Ministry will continue to work closely with and proactively engage its partner ministries on matters related to land use planning, through existing land use planning tables (e.g., Planning, Environment, Resource and Land (PERL) meetings and Provincial Planning Directors' Committee (PPDC) meetings), new committees as needed, and other collaborative meetings such as One-Window Core Team meetings at the regional staff and manager levels. <i>Land Use Planning Ministries and the One Window Protocol</i> • In late 2022/early 2023, the Ministry intends to initiate the five-year review of the One Window Protocol. This will include confirmation of the participation of the Ministry of Infrastructure (MOI), Ministry of Long-term Care (MLTC), and Ministry of Health (MOH) and finalization of associated screening criteria, as applicable. <i>Streamlining the Land Use Planning Process</i> • The Ministry has recently taken additional steps to make the land use planning process more streamlined and efficient. Three funding programs enable municipalities to modernize, streamline, and accelerate processes for managing and approving development applications with a focus on increasing housing supply. • The Ministry intends to continue to work in partnership with municipalities to identify and implement streamlining measures.

Update on MMAH's action plans and timetable for addressing the Auditor's concerns

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1.	So that the Ministry of Municipal Affairs and Housing (Ministry) can assess and publicly report on whether the policies in the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) are effective in meeting the objectives of the plan, we recommend that the Ministry: • establish and publicly communicate a deadline for the Ministry to finalize the performance indicators for the Growth Plan; • develop and publicly communicate the performance indicators by the established deadline, including the date by which the Ministry will begin reporting on the indicators and the frequency of ongoing reporting; and • publicly report on the results for each performance indicator, including what the results mean in terms of achieving the vision of the Growth Plan, by the dates communicated in the second action item in this recommendation.	The Ministry agrees that meaningful, regular publicly-reported performance indicators are important to understanding growth in the Greater Golden Horseshoe and has been working towards this in accordance with the policies of the Growth Plan. Data accessibility has traditionally been a challenge and the Ministry is actively engaged in efforts to revise performance indicators and develop the internal processes to enable ongoing and regular reporting. There is a necessary dependence on third parties such as Statistics Canada and the Municipal Property Assessment Corporation, as well as municipalities for data to inform growth management performance indicators and deliver those indicators in a regular, predictable cycle. The Ministry will explore the feasibility of establishing a public deadline and will work with municipalities and other data providers to explore and engage in long-term data sharing arrangements to finalize a suite of performance indicators and determine an appropriate public reporting cycle.	As the Auditor General noted in the report (p.22), the Ministry has commenced work in preparation of updating and publicly reporting on the results for each Growth Plan performance indicator. The Ministry is continuing to work on reviewing and revising the existing performance indicators and putting the results into the context of achieving the vision of the Growth Plan by the planning horizon. The Ministry recognizes work is underway by upper- and single-tier municipalities in the Greater Golden Horseshoe (GGH) to update their official plans to conform with the Growth Plan (known as the municipal comprehensive review) by July 1, 2022. The date for releasing the results of the Growth Plan performance indicators will subsequently be established in consideration of the anticipated availability of data through the municipal comprehensive review, along with the availability of other data sources, like the 2021 Census of Canada, as noted below in Recommendation #3. The Ministry anticipates establishing and publicly communicating a deadline (in late 2022/early 2023) to publicly report on each Growth Plan performance indicator in consultation with other ministries, municipalities, data providers and stakeholders (e.g.,	December 2023

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			the Regional Planning Commissioners of Ontario, Ontario Home Builders' Association). In 2023, the Ministry intends to work towards completing consultation with stakeholders, finalizing the necessary data collection, conducting analysis, and publicly reporting on each Growth Plan performance indicator.	
2.	So that the Ministry of Municipal Affairs and Housing (Ministry) can assess whether the policies in the A Place to Grow: Growth Plan for the Greater Golden Horseshoe are effective in meeting the objectives of the plan, we recommend that when municipalities are not making progress towards meeting Growth Plan targets, the Ministry work with municipalities to determine, understand and address the reasons for not making progress.	The Ministry acknowledges the Auditor General's recommendation and the need for continued engagement with municipalities to help ensure that reasonable progress is being made towards meeting Growth Plan targets within the planning horizon of 2051, including all applicable targets permitted under the Plan. The municipal comprehensive review (MCR) is the mechanism under the Growth Plan to assess progress towards, identify challenges, evaluate and recalibrate official plan policies and targets with A Place to Grow: Growth Plan for the Greater Golden Horseshoe. The MCR process is currently underway for all upper- and single-tier municipalities within the Greater Golden Horseshoe and the Ministry is in the process of working with municipalities to collect evidence of progress against Growth Plan targets. With respect to intensification targets, the only targets that are to be assessed annually, the Ministry will continue to engage municipalities through the MCR process to assess progress and support implementation. The Ministry will also explore opportunities for assessing and reporting on progress through work on publicly-reported performance indicators as suggested in Recommendation 1. Recognizing that the Growth Plan provides flexibility to municipalities to plan for and achieve targets by the end of the planning horizon that suit local circumstances and infrastructure, the Ministry will improve its collaboration with municipalities to ensure reasonable progress is being made towards achieving Growth Plan targets and encourage municipalities to engage early and frequently as they work	The Ministry intends to continue to encourage municipalities to engage early and frequently as they work through the municipal comprehensive review to identify any issues or challenges with meeting the objectives of the Growth Plan. The Ministry intends to continue to provide support throughout the municipal comprehensive review and will continue to work collaboratively with municipalities to ensure that reasonable progress is made towards meeting Growth Plan targets within the planning horizon of 2051. Recognizing that municipalities plan for and achieve targets by the end of the planning horizon that suit local circumstances, market conditions and infrastructure and other constraints, the Ministry intends to work with municipalities once their official plans have been updated through the municipal comprehensive review to understand and assess progress towards the targets consistently. In 2023, building on work to update and report on updated performance indicators, as noted above, the Ministry intends to engage with internal and external stakeholders to standardize methodologies and develop ongoing data collection strategies. Beyond	December 2023 and on an ongoing basis thereafter

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		through their respective Official Plan/Official Plan Amendment review and update processes, including assessing alternative area-specific targets (and re-evaluating the suitability of any alternative targets approved through the previous MCR). The Ministry will strengthen those relationships to enhance understanding of and support for municipal-specific challenges in meeting Growth Plan targets.	2023, the Ministry will support municipalities consistent with the ongoing data collection and reporting strategies as noted in Recommendation 3. Following the completion of an analysis using Lean methodologies in Fall 2021, the Ministry, in partnership with the Ontario Digital Service, has begun work towards the creation of a data standard for development approvals. This work is anticipated to create consistent rules for the content, structure, and formatting of data; new guidelines for the practices and processes related to the collection and transfer/exchange of this data; and/or uniform definitions for terminology. It is expected that this work could also support with the efficient data collection and reporting by municipalities.	
3.	So that the Ministry of Municipal Affairs and Housing (Ministry) can assess whether the policies in the A Place to Grow: Growth Plan for the Greater Golden Horseshoe (Growth Plan) are effective in meeting the objectives of the plan, we recommend that the Ministry: • determine how it will collect the information necessary to report on established performance indicators such as density targets for designated greenfield areas and long-term housing supply information; • obtain and analyze this information on an ongoing basis; and work with municipalities to establish a consistent basis for calculating municipalities' progress toward targets set out in the Growth Plan.	The Ministry accepts the Auditor General's recommendation and acknowledges that data accessibility has traditionally been a challenge, and is currently engaged in efforts to improve data holdings and capacity for data analysis. Information and data relevant to informing Growth Plan performance indicators is generated and held by a number of partners, collected at different points in time, and in disparate methodologies and formats. The Ministry will continue to work with data providers to explore and engage in long-term data sharing arrangements, including opportunities to standardize methodologies and formats to effectively monitor growth targets in the GGH. The Ministry will make better use of tools at its disposal, such as the authority in the Growth Plan to collect data from municipalities to support implementation and monitoring to demonstrate progress.	As the Auditor General noted in the report (p.22), the Ministry has already initiated work in preparation of updating and publicly reporting on the results for each Growth Plan performance indicator. The Ministry has continued work on collecting the information necessary to support the monitoring and reporting on how the objectives of the Growth Plan are being met. The approach includes securing long-term data licence agreements to facilitate the timely and ongoing release of updated indicators, collecting data as authorized under the Growth Plan, and partnering with internal and external stakeholders. Since the release of the report, the Ministry has taken actions to support implementation:	December 2023

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			• In February 2022, the Ministry procured updated property assessment data from the Municipal Property Assessment Corporation (MPAC) to support ongoing Growth Plan monitoring and reporting. The Ministry and MPAC entered into a long-term agreement. The Ministry and MPAC worked collaboratively to ensure future reporting needs were incorporated into the licence agreement. • The Ministry is engaged with Statistics Canada to access 2021 Census of Canada data. Based on the public Statistics Canada data release work plan, the Census data that the Ministry anticipates will support the performance indicators will be released in mid to late 2023. The Ministry will continue to work with Statistics Canada to obtain the necessary data. • Data collection for the 2022 Transportation Tomorrow Survey to support mobility-related Growth Plan performance indicators will take place between fall 2022 and spring 2023. The Ministry will continue to engage with the survey consortium, led provincially by MTO, to ensure timely access to the data. • The Ministry has initiated preliminary steps with MECP and other ministries to update the greenhouse gas Growth Plan performance indicator and will continue to develop an approach to updating the data through 2022.	

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			Since December 2021, the Ministry has been working with the Ontario Digital Service on the creation of a roadmap for a data standard that could provide consistent rules for the content, structure, and formatting of data; new guidelines for the practices and processes related to the collection and transfer/exchange of this data; and/or uniform definitions for terminology in this space. This work is expected to continue into the 2022-2023 fiscal year. The Ministry intends to also collect data from each upper- and single-tier municipality as part of the municipal comprehensive review to monitor progress in meeting Growth Plan objectives. Through 2022, the Ministry intends to engage with stakeholders to develop, assess and review data to be used to assess and monitor the Growth Plan using a consistent basis for calculating municipalities' progress toward targets and establishing a date to release updated Growth Plan performance indicators, as noted in Recommendation #1. In 2023, building on the work to report on updated indicators noted above, the Ministry intends to engage with internal and external stakeholders to standardize methodologies and develop ongoing data collection and reporting strategies.	
4.	So that municipalities have the necessary information and sufficient time to update their official plans to conform with provincial plans, we recommend that	The Ministry acknowledges the Auditor General's recommendation. The Ministry already works closely with GGH municipalities to provide timely support, appropriate guidance, and direction throughout the conformity process. Official Plan	The Ministry is continuing to work closely with GGH municipalities to provide timely support, appropriate guidance, and direction throughout the conformity process, and is having ongoing discussions/meetings	December 2022

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	the Ministry of Municipal Affairs and Housing work with municipalities on an ongoing basis to: • determine what information and supports are needed by municipalities to help them conform, including meeting conformity deadlines; and • provide such information and supports to municipalities in a timely manner that will enable municipalities to meet conformity deadlines.	Conformity refers to the requirement under the Planning Act for municipalities to update their official plans to, among other matters, conform with provincial plans. The Places to Grow Act, 2005 requires that upper- and single-tier municipalities must update their official plans to conform with A Place to Grow: the Growth Plan for the Greater Golden Horseshoe within three (3) years or an alternative date set by the Minister. Municipalities are aware of the current conformity deadline of July 1, 2022, for upper-tier municipalities where the Province is the approval authority, and of the associated expectations, requirements, and processes.	as needed with municipalities at appropriate intervals to provide needed technical support and input. For example, on March 4, 2022, the Ministry staff attended a Regional Planning Commissioners of Ontario - Greater Golden Horseshoe Caucus meeting to discuss and provide updates on conformity. Over the coming months, the Ministry will continue to meet and engage with upper- and single-tier municipalities during the conformity process. For example, bi-weekly meetings currently take place with the Region of Waterloo and monthly conformity meetings currently take place with Dufferin County.	
5.	So that municipalities have the information they need to effectively implement the policies in the Provincial Policy Statement and various provincial plans, we recommend that the Ministry of Municipal Affairs and Housing work with municipalities to: • determine what areas existing and new Ministry staff can benefit from training in; and • provide such training on a regular ongoing basis.	The Ministry recognizes the importance of technical training and capacity building for its staff, in particular when there are changes to policies, provincial plans and legislation, and related processes. The Ministry will determine where such training can be enhanced. The Ministry's organizational re-alignment (implemented on September 20, 2021) will result in better integration of provincial policies and plans and official plan conformity expertise, helping to streamline implementation and support effective decision-making and service delivery to municipalities. The re-alignment will create a continuum from regional level to site specific planning and development policy to support a better built environment.	Over the coming months, the Ministry intends to engage in internal and external (as appropriate) conversations about where staff training can be enhanced and implement such training as applicable. Related tools and resources will be revised based on the outcomes. The Ministry will continue to ensure existing training tools and resources are shared with new staff when they join and that these materials are updated as needed.	December 2022
6.	So that land-use planning is well integrated with other related planning processes in the province, consistent with the policies of the Growth Plan for the Greater Golden Horseshoe, we recommend that the Ministry of Municipal Affairs and Housing proactively engage with other provincial ministries and entities responsible for planning processes related to land-	The Ministry recognizes the need and value of proactive engagement with other provincial ministries and entities responsible for processes related to land-use planning through its existing regular engagements at its many partner ministry land use planning tables including, for example: • Planning Policy Directors Committee (PPDC);	In 2022, the Ministry will continue to work closely with and proactively engage its partner ministries on matters related to land use planning, through existing land use planning tables (e.g., PERL meetings and PPDC meetings), new committees as needed, and other collaborative meetings such as One-Window	December 2022

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	use planning on an ongoing basis, for example through the Planning System Implementation Committee.	• Planning, Environment, Resources and Land Use (PERL) Committees at the Deputy Minister, Assistant Deputy Minister and Director levels; and • provincial and regional One Window Core Team meetings at the manager and staff levels. The Ministry will continue its proactive engagement with other provincial ministries through its multiple collaborative relationships (e.g., working groups and collaborations related to specific initiatives and projects that are both Ministry-led and led by partner ministries) and will consider where these relationships could be enhanced.	Core Team meetings at the regional staff and manager levels. The Ministry also meets with partner ministries as needed to provide them with updates on the status of each municipalities' conformity work and to obtain their input as it pertains to their mandates. For example, a multi-ministry manager-level meeting was held in November 2021 that included the Ministry of Northern Development and Mines, Natural Resources and Forestry (NDMNRF), the Ministry of Environment, Conservation and Parks (MECP), the Ministry of Agriculture, Food and Rural Affairs (OMAFRA) and the Ministry of Economic Development, Job Creation and Trade (MEDJCT).	
7.	So that land-use planning interests of other provincial ministries are appropriately considered and reflected in municipal planning policies, we recommend that the Ministry of Municipal Affairs and Housing: • finalize the screening criteria for circulating municipal planning submissions to the Ministry of Infrastructure; • formalize the participation of the Ministry of Health and the Ministry of Long-Term Care in the One Window Protocol (Protocol); and • assess, during the next review of the Protocol in 2023, whether other provincial ministries should be included in the Protocol in light of their mandates.	The Ministry accepts the Auditor General's recommendation and will meet with the Ministry of Infrastructure, the Ministry of Health, and the Ministry of Long-Term Care to discuss the status of, and considerations for, their participation in the One Window Protocol. This will include whether the Protocol is the best mechanism for addressing their planning interests, or whether alternative options should be considered. The Ministry notes that the Ministry of Indigenous Affairs has also expressed interest in participating in the One Window Protocol and has initiated those conversations. At the time of the five-year review of the Protocol in 2023, the Ministry will re-assess which ministries are included in the Protocol.	In late 2022/early 2023, the Ministry intends to initiate the five-year review of the One Window Protocol. This will include confirmation of the participation of MOI, MLTC, and MOH and finalization of associated screening criteria, as applicable.	December 2023
8.	So that conservation authorities continue to effectively exercise independent authority to direct development away from flood- and erosion prone areas, we recommend that the Ministry, in	The Ministry does not have responsibility for implementing this recommendation. Amendments made to the Planning Act were consequential to changes made to the Conservation Authorities Act to streamline conservation authority permitting	As per the Ministry's response to recommendation 8, the Ministry does not have responsibility for implementing this recommendation as the NDMNRF was responsible for Schedule 6 of Bill 229.	No longer applicable.

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	collaboration with Ministry of Northern Development, Mines, Natural Resources and Forestry: • review the impacts of the amendments contained in Schedule 6 of Bill 229 considering comments received from municipalities, conservation authorities and the public; and • based on the results of this review, address the concerns identified.	and land-use planning reviews. The Ministry of Northern Development, Mines, Natural Resources and Forestry was responsible for Schedule 6 of Bill 229, which received royal assent on December 8, 2020.		
9.	So that Minister's Zoning Orders (MZOs) are not used as a way to circumvent the normal planning process in order to speed up development projects, we recommend that the Ministry of Municipal Affairs and Housing work with municipalities to identify and implement ways to make the land-use planning process more streamlined and efficient while still complying with due diligence and public consultation requirements under the Planning Act.	MZOs form part of the land-use planning system in Ontario as established in the Planning Act and are a part of the planning process. The Ministry recognizes the importance of continuing to look for ways to further streamline the land-use planning system and will continue to work with municipalities and other stakeholders to identify opportunities to do so. Bill 108, the More Homes, More Choice Act, 2019 made amendments to the Planning Act to streamline development approvals processes and facilitate faster decisions by reducing decision timelines for local planning decisions and making the appeals process more efficient. The Ministry will continue to work in partnership with municipalities to identify and implement ways to make the land-use planning process more streamlined and efficient. For example, Ontario is providing up to \$350 million through to fiscal year 2022/23 to help municipalities lower costs and improve services for local residents over the long term, through the Audit and Accountability Fund (AAF) for larger municipalities and the Municipal Modernization Program for smaller municipalities. Both programs offer funding to municipalities to undertake reviews to find efficiencies, including streamlining development and planning approvals.	The Ministry has recently taken additional steps to make the land use planning system, which is implemented by municipalities, more streamlined and efficient. Three funding programs enable municipalities to modernize, streamline, and accelerate processes for managing and approving development applications with a focus on increasing housing supply: • over \$45 million dollars for the Streamline Development Approvals Fund; • more than \$8 million dollars through the Audit and Accountability Fund; • a third round of projects has been approved under the Municipal Modernization Program, providing over \$28 million for 322 projects in small and rural municipalities to modernize, digitize, and improve local operations, including streamlining housing approval processes. The Ministry intends to continue to work in partnership with municipalities to identify and implement streamlining measures.	December 2023

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10.	To improve transparency and accountability for Minister's Zoning Orders (MZOs), we recommend that the Ministry of Municipal Affairs and Housing: • establish and publicly communicate a formal application and review process, which clearly sets out the following: • the types of matters for which interested parties may request an MZO; • the criteria that the Minister will use to determine whether to issue an MZO; and • the required studies, analyses or due diligence that the requester of the MZO must submit to support its request; and • when issuing MZOs, publicly and clearly communicate the following: • the parties who requested the MZO; • the factors that the Minister considered in deciding whether to issue the MZO; and • the reasons why the development cannot proceed through the normal planning application process ----- Auditor General Response The Ministry's response does not address the Recommendation. The Ministry did not agree to establish and publicly communicate a formal application and review process for MZOs.	The Planning Act authorizes the Minister to make an MZO to regulate the use of land. MZOs form part of the land-use planning system in Ontario as established in the Planning Act. In partnership with municipalities, MZOs are a tool the government uses to accelerate the development of critical projects located outside of the Greenbelt, such as affordable housing, health-care facilities, and long-term-care homes. MZOs are helping to ensure that priority projects do not face unnecessary delays and barriers. The Minister has publicly stated that he expects that municipal requests for a zoning order include a supporting Council resolution on non-provincially owned lands, which is a public document. As Council meetings are generally open to the public, this adds to public awareness of a request being made, often with supporting materials and background reports, for the Minister to consider when granting a zoning order. The Minister has publicly stated that he expects that before a municipality requests an MZO it does its due diligence, which includes consultation in their communities, connecting with conservation authorities and engaging with potentially-affected Indigenous communities. The Minister has publicly stated that MZOs granted on non-provincially owned land are made at the request of the local municipality. Under the Planning Act, the Minister is required to have regard to matters of provincial interests when exercising his authority to grant Minister's Zoning Orders.	As per the Ministry's response to recommendation 10, the Ministry will not be taking additional steps to implement this recommendation given the expectations and processes that are already in place.	Will not be implemented for the reasons provided.
11.	To prevent or minimize disruption in other long term planning processes that are impacted by Minister's Zoning Orders (MZOs), we recommend that the Ministry of Municipal Affairs and Housing incorporate and document consultation with impacted	MZOs form part of the land-use planning system in Ontario as established in the Planning Act and are a constituent element of long-term planning processes. The Ministry continues to consult with municipalities as part of its due diligence to inform	As per the Ministry's response to recommendation 11, the Ministry will not be taking additional steps to implement this recommendation given the expectations and processes that are already in place.	Will not be implemented for the reasons provided.

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	municipalities (including both upper and lower-tier municipalities) in the MZO review process to be established in response to Recommendation 10. ----- Auditor General Response The Ministry's response does not address the Recommendation. The Ministry did not agree to establish a formal review process for MZO in response to Recommendation 10 and to incorporate and document consultation with impacted municipalities with respect to the process.	the Minister's consideration of granting an MZO under the Planning Act.		
12.	So that when Minister's Zoning Orders (MZOs) are issued they are consistent with the purposes of the Planning Act which recognizes the decision-making authority and accountability of municipal councils, and provides for a land-use planning system led by provincial policy, we recommend that the Ministry of Municipal Affairs and Housing: • incorporate public consultation in the MZO review process to be established in response to Recommendation 10; • work with municipalities when issuing enhanced MZOs so that local considerations are sufficiently addressed in Minister overrides of site plan controls; and • publicly communicate, for each MZO, whether the issuance of the MZO is consistent with the Provincial Policy Statement and where it is not consistent, describe why the MZO is being issued and	The Planning Act authorizes the Minister to grant an MZO to regulate the use of land and municipalities continue to be the approval authority for any downstream approvals, including other local planning applications (e.g. plan of subdivision). The Ministry will continue to consult with municipalities as part of its due diligence to inform the Minister's consideration of granting an MZO under the Planning Act, including enhanced MZOs. The Minister has publicly stated that he expects that before municipalities request an MZO, they do their due diligence, which includes consultation in their communities, connecting with conservation authorities and engaging with potentially affected Indigenous communities. Under the Planning Act, the Minister is required to have regard to matters of provincial interests when exercising his authority to grant MZOs.	As per the Ministry's response to recommendation 12, the Ministry will not be taking additional steps to implement this recommendation given the expectations and processes that are already in place.	Will not be implemented for the reasons provided.

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	steps taken to minimize or avoid the negative impact of issuing the MZO. ----- Auditor General Response The Ministry's response does not address the Recommendation. The Ministry did not agree to establish a formal review process for MZO's in response to Recommendation 10 and to incorporate public consultation with respect to the process. The Ministry also did not agree to publicly communicate whether the issuance of the MZO is consistent with the Provincial Policy Statement and, where it is not consistent, to describe why the MZO is being issued and steps taken to minimize or avoid the negative impact of issuing the MZO.			