

Chapter 2

Section 2.01

Treasury Board Secretariat

Follow-Up on 2020 Value-for-Money Audit:

COVID-19 Preparedness and Management Special Report

Chapter 1: Emergency Management in Ontario – Pandemic Response

RECOMMENDATION STATUS OVERVIEW

	# of Actions Recommended	Status of Actions Recommended				
		Fully Implemented	In the Process of Being Implemented	Little or No Progress	Will Not Be Implemented	No Longer Applicable
Recommendation 1	1		1			
Recommendation 2	1		1			
Recommendation 3	8	2	6			
Recommendation 4	2		2			
Total	12	2	10	0	0	0
%	100	17	83	0	0	0

Overall Conclusion

The Provincial Emergency Management Office (EMO) within the Treasury Board Secretariat (Secretariat), as of November 4, 2022, has fully implemented 17% of actions we recommended in our 2020 Special Report. EMO has made progress in implementing an additional 83% of the recommendations.

EMO has fully implemented the recommendations requiring it to put a process in place to ensure emergency response plans are reviewed annually and updated, and to implement a province-wide IT system for emergency management.

Although progress to fully implement the recommendations has been slow to date, a number of critical developments have recently occurred at EMO, as noted below. These developments are expected to have a significant impact on implementing the recommendations

in the future, and on the emergency management program in Ontario:

- In January 2022, staffing at EMO was increased based on a staffing review that was conducted in 2021, adding 69 positions, which is an increase from 79 at the time of the special audit in 2020. During the 2022/23 fiscal year, additional funding of \$500,000 was provided for four new positions, along with an additional \$3 million which EMO stated was for 46 additional staff, prorated for the last six months of the fiscal year. As of September 30, 2022, a total of 136 positions were filled at EMO and recruiting efforts were continuing for the remaining positions.
- In April 2022, a new Deputy Minister/Commissioner of Emergency Management position was created and filled. This new role provides dedicated leadership to Ontario's emergency management system.

- Also in April 2022, amendments were made to the *Emergency Management and Civil Protection Act* through the new *Pandemic and Emergency Preparedness Act*. The changes require that the Secretariat establish an accountability and governance framework that sets out the roles and responsibilities of EMO's partners during an emergency. The changes also require the Secretariat to develop and publish a provincial emergency management plan.
- In June 2022, the new Deputy Minister/Commissioner and EMO were transferred from the Ministry of the Solicitor General to the Secretariat, which is a more centralized placement for the office in the government.
- In July 2022, a new organizational structure was rolled out for EMO, which includes the new Deputy Minister/Commissioner and three Assistant Deputy Ministers that each head up divisions (previously there was only one division).

The status of actions taken on each of our recommendations is described in this report.

Background

This report was one in a series of reports undertaken by our Office on the Province's response to COVID-19. Our 2020 audit, *Outbreak Planning and Decision-Making*, focused on the COVID-19 response of Ontario's health sector, while this report focused on the Provincial Emergency Management Office's (EMO) role and participation in the COVID-19 response for non-health-sector issues, with a focus on provincial co-ordination.

At the time of our special audit in 2020, EMO was part of the Ministry of the Solicitor General; however, the office was transferred to the Treasury Board Secretariat (Secretariat) in June 2022.

EMO is responsible for the Provincial Emergency Response Plan for Ontario, while the Ministry of Health is responsible for the health-related response plans. In response to COVID-19 specifically, the Ministry of Health led critically important public health measures,

while EMO was responsible for co-ordinating the many other aspects of emergency response, such as liaising with its stakeholders in the province (for example, ministries, municipalities, the federal government and First Nations). This includes providing information updates, holding discussions and identifying emerging issues.

Overall, we found that, given a significant change-over in leadership at EMO (prior to COVID-19), its outdated emergency plans and a lack of sufficient staff, the Province was not in a good position to activate the provincial response structure in its emergency response plan when the COVID-19 pandemic arrived in Ontario. The Province responded to the crisis by hiring an external consultant to create a new structure. The Secretary of Cabinet believed there was a need to create a whole-of-government approach. In contrast to Ontario, other provinces activated their existing response structures and emergency plans.

We also found that EMO had not undertaken detailed planning for subsequent waves of the pandemic. For example, it had not yet planned or had discussions with municipalities about planning for winter events like ice storms, extended power failures and other winter hazards which could have impacted the COVID-19 response due to the potentially large number of individuals displaced and also the need for individuals to quarantine.

The following were some of our significant observations:

- Continuing lack of progress in implementing our 2017 audit recommendations exposed the Province to increased risks in its handling of emergency situations in Ontario. Almost three years after our 2017 audit on *Emergency Management in Ontario*, the Ministry of the Solicitor General had implemented only four or 11% of our 36 recommended actions it was responsible for. No additional recommendations had been implemented since our two-year follow-up was done in 2019.
- The Provincial Emergency Response Plan's provisions for governance were not followed effectively. According to the Provincial Emergency Response Plan, the Cabinet Committee on

Emergency Management (Cabinet Emergency Committee) is the main governance body for emergency management in Ontario. One of its main roles is to develop the overall provincial emergency management response strategy. The Cabinet Emergency Committee met for the first time in many years in November 2019. This was only an introductory meeting where EMO provided an overview of its role and mandate and of emergency management in Ontario. During the first wave of the pandemic, the Cabinet Emergency Committee met three times.

- EMO was not positioned to operate effectively and in a focused manner with province-wide jurisdiction. At the time of our audit, EMO was part of the Ministry of the Solicitor General, with the Commissioner of Emergency Management also being the Deputy Solicitor General of Community Safety. As such, he split his time between emergency management and other community safety programs of the Ministry, including the Ontario Provincial Police and the Office of the Fire Marshall. The lack of a dedicated Commissioner of Emergency Management was one factor keeping EMO from full effectiveness in provincial emergency management.
- Critical response plans were not updated (even when world conditions were signalling a potential pandemic risk) and available to be used as a guide during the COVID-19 declared emergency.
- EMO lacked a staffing strategy for responding to lengthy, large-scale emergencies. As a result, during the COVID-19 emergency, EMO did not have a viable plan to quickly ramp up its staffing to assist in its Provincial Emergency Operations Centre—for example, by hiring more staff, using experienced volunteers, or training other staff in the province to assist. This limited its ability to assist municipalities and ministries, and also put most of the program work at EMO (such as preparing for nuclear emergencies or training emergency management staff in municipalities) on hold.

We made four recommendations, consisting of 12 action items, to address our audit findings.

We received commitment from the Ministry of the Solicitor General that it would take action to address our recommendations, and the Cabinet Office supported the Ministry's responses to our recommendations.

Standing Committee on Public Accounts

On April 14, 2021, the Standing Committee on Public Accounts (Committee) held a public hearing on our Emergency Management in Ontario – Pandemic Response special report. In February 2022, the Committee tabled a report in the Legislature resulting from this hearing. The Committee endorsed our findings and recommendations, and made six additional recommendations. The Treasury Board Secretariat reported back to the Committee in August 2022. The Committee's recommendations and our follow-up on its recommendations are found in **Chapter 3, Section 3.08** of our *2022 Annual Report*.

Status of Actions Taken on Recommendations

We conducted assurance work between May 2022 and August 2022. We obtained written representation from the Treasury Board Secretariat (Secretariat) that effective November 4, 2022, it has provided us with a complete update of the status of the recommendations we made in the original audit two years ago.

EMO Not Prepared to Address COVID-19—EMO’s Continuing Lack of Progress on Recommendations from Office of the Auditor General of Ontario’s 2017 Audit Report

Recommendation 1

For the province to better prepare for subsequent waves of COVID-19 and other future emergencies, we recommend that the Ministry of the Solicitor General make a concerted effort to expediently and fully implement the recommendations from our 2017 audit report.

Status: In the process of being implemented by December 2025.

Details

While we were conducting our work for this special audit in 2020, we reviewed the status of the recommendations made to the Provincial Emergency Management Office (EMO) in our 2017 value-for-money audit report titled *Emergency Management in Ontario*. We noted that in almost three years, EMO had implemented only four or 11% of 36 recommended actions it was responsible for. During our 2019 follow-up, EMO had committed to fully implement another eight recommended actions by March 2020. It did not meet this commitment.

From our work on the audit in 2017 and the two-year follow-up in 2019, we noted that EMO had a history of starting and later stopping projects and work groups, and of drafting plans, discussion papers and project charters that were never implemented or finalized. In addition, EMO developed an “Ontario Emergency Management Action Plan” just days ahead of our 2017 report tabling. It was intended to demonstrate that EMO was responding proactively to our recommendations. The action plan included a detailed plan for implementing actions that would address recommendations in several recent reports, including our 2017 report. It stated that “Ontario is committed to an emergency management system that is effective, responsive and able to adapt to the unique circumstance of communities across the province.” However, most of our recommendations had still not been implemented by the start of the COVID-19 pandemic, and it

was evident that this inaction affected Ontario’s readiness to deal with the pandemic.

During the follow-up, EMO told us that it has balanced making progress on the recommendations, many of which are multi-year undertakings, with engaging in various emergency planning and response activities including the ongoing provincial response to COVID-19.

We again reviewed the status of the recommendations in the 2017 value-for-money audit report and noted that EMO had fully implemented nine (25%, up from four or 11% in 2020) recommended actions of the 36 it was responsible for. In addition, 24 (67%, up from 18 or 50% in 2020) recommended actions were in the process of being implemented. There had been little or no progress on one (3%, down from 12 or 33% in 2020) recommended action. (EMO previously told us that it would not be implementing two of the 36 recommended actions.) Under the new organizational structure described above, EMO plans to implement all outstanding recommended actions by December 2025.

Lack of Preparedness Impacted the Response to the COVID-19 Emergency

Recommendation 2

To ensure emergency management and, in particular, the Provincial Emergency Management Office (EMO), is given the importance needed to properly safeguard the people of Ontario from future emergencies, we recommend that the Ministry of the Solicitor General, in conjunction with the province, review the placement of EMO in the government and province, and put appropriate governance structures and oversight processes in place, including an effective leadership and staffing structure.

Status: In the process of being implemented by March 2023.

Details

Our 2017 audit noted that although EMO’s intended function is to oversee a province-wide emergency management program, the lower priority and importance given to this important role affected the level of services it provided and weakened its function. Several factors related to the governance and oversight of EMO

contributed to this situation. We reviewed each of these factors again during the 2020 special audit and noted there was little change with regards to the governance and oversight of the province-wide emergency management program:

- EMO continued to be positioned within a ministry, with continuing turnover in its leadership roles (Commissioner and Chief) that made it more challenging for EMO to make changes, implement recommendations, and adopt and implement best practices.
- The Province had still not established a government-wide executive-level committee, such as at the Deputy Minister level, to discuss emergency management in the province, as other provinces had done.
- The Deputy Solicitor General of Community Safety was also the Commissioner of Emergency Management, thus splitting his attention between emergency management and the Ministry of the Solicitor General's community safety programs, including police and fire services.
- The Cabinet Committee on Emergency Management rarely met, even though it was supposed to be the main governance body over emergency management in Ontario. In November 2019, it met for the first time in many years to get an overview of its role and mandate from EMO. Then, during the first wave of the pandemic, it met just three times despite its key role of developing the strategy for Ontario's overall emergency management response.

During the follow-up, we found that in April 2022 a new Deputy Minister/Commissioner position for Emergency Management was created and filled. This new role provides dedicated leadership to Ontario's emergency management system. We also found some continuity in the Chief (Assistant Deputy Minister) position, which had retained the same individual since February 2020. In addition, the new Deputy Minister/Commissioner, along with EMO, was transferred to the Treasury Board Secretariat (Secretariat) in June 2022, giving the office a more central placement in the

government. These changes also resulted in an expansion of the office from one division to three divisions.

The Secretariat reviewed EMO's staffing needs in 2021 and identified additional staff required to address gaps in certain areas. As a result, in January 2022, EMO added 69 staffing positions, up from 79 at the time of the special audit in 2020, with a large increase in the field services area. During the 2022/23 fiscal year, additional funding of \$500,000 was provided for four new positions, along with \$3 million which EMO stated was for 46 additional staff, prorated for the last six months of the fiscal year. EMO has restructured accordingly; as of September 30, 2022, a total of 136 positions were filled at EMO and recruiting efforts were continuing for the remaining positions.

However, we found that Ontario still did not have an executive-level committee for emergency management like many of the other provinces do, but plans to implement one by December 2022. This will give emergency management a province-wide focus because it will involve Deputy Ministers from several ministries. At the time of our follow-up, EMO was reviewing the *Emergency Management and Civil Protection Act (Act)* and was developing an updated emergency management governance and oversight structure which will include implementing the new executive-level committee and reassessing the role of the Cabinet Committee on Emergency Management. EMO plans to implement this recommendation by March 2023, including obtaining government approval for an updated governance and oversight structure.

As part of this review process, amendments were made to the Act through the new *Pandemic and Emergency Preparedness Act*, which was proclaimed in April 2022. These changes require the Secretariat to establish an accountability and governance framework that sets out the roles and responsibilities of EMO's partners during an emergency. These changes also require the development and publication of a provincial emergency management plan, which will be a separate document from the Provincial Emergency Response Plan.

Recommendation 3

In order to ensure effective emergency management programs are in place in the province, including at ministries and municipalities, to enable the province to be properly prepared for any type of emergency, we recommend that the Ministry of the Solicitor General:

- *ensure response plans are reviewed annually and updated;*

Status: Fully implemented.

Details

In our 2020 audit report, we noted that the four critical response plans relevant to the COVID-19 emergency had not been recently updated. The Provincial Emergency Response Plan, which is intended to be used to co-ordinate the overall provincial response to any type of emergency, was updated in November 2019, but had not been finalized when the COVID-19 pandemic began because it was pending translation and coding for accessible formats, and was not publicly available. The previous plan was dated 2008, even though EMO's internal guidelines require it be fully updated every four years. The Provincial Co-ordination Plan for Influenza Pandemic, which supports the Provincial Emergency Response Plan, had also not been updated since 2006. In addition, the Ministry of Health had two plans that were relevant for COVID-19—its Ministry Emergency Response Plan and its Ontario Health Pandemic Influenza Plan. Neither of these plans had been updated since 2013.

Outdated plans have limited usefulness because they do not reflect, for example, changes in roles and responsibilities of relevant parties, program changes, best practices based on recent events or advances in technology and communications solutions; this could cause delays or confusion in response efforts, such as how and where to find critical information. The failure to annually review and update the legislated emergency response plans (the Ministry of Health emergency response plans) as needed contravened the requirements of the *Emergency Management and Civil Protection Act*.

In our follow-up, we found that EMO finalized and publicly published the updated Provincial Emergency

Response Plan in December 2020. EMO also added new requirements in its 2021 compliance review guidance document (for the review conducted in 2022) which asked ministries to update their response plans based on recent emergency events, practice tests (exercises), best practices and lessons learned. EMO followed up on these new requirements as part of its 2021 compliance review of ministry emergency management programs that was completed in May 2022, and asked for an explanation if a ministry's plan was not updated. EMO is also now recommending that ministries' response plans are updated for changes in technology, processes and resources, as well as lessons learned from emergencies and incidents, including COVID-19.

In addition, EMO has requested that ministries add a "Last Reviewed/Revised History" table to their response plans in order to document annual reviews and/or updates, to avoid confusion and reinforce the need to review and update plans.

- *implement a provincial multi-year strategy to test emergency response plans, with a focus on the critical emergency response plans in the province*

Status: In the process of being implemented by March 2023.

Details

During the 2020 special audit, we revisited a recommendation from our 2017 audit report that EMO develop and implement a multi-year strategy for practice tests (exercises) in accordance with best practices for the province. This included focusing on high-risk events, with the tests increasing in complexity and scale year by year. This recommendation had not been implemented.

We then reviewed practice tests undertaken by EMO and the Ministry of Health since our 2017 audit and noted that neither organization had undertaken any tests pertaining to the four emergency response plans that were relevant to COVID-19 (the Provincial Emergency Response Plan, the Provincial Co-ordination Plan for Influenza Pandemic, the Ministry of Health Emergency Response Plan, and the Ontario Health Plan for an Influenza Pandemic). This is despite Ontario's

Hazard Identification and Risk Assessment program noting an apparent increase in many infectious diseases, including newly circulating ones, and that high-density populations, especially with a growing and mobile population and global reach, were at high risk for the introduction of infectious diseases into the population.

The failure to practice-test pandemic or other provincial-emergency scenarios meant the province was not well prepared for responding to COVID-19. The practice tests would also have allowed relevant parties to work together and get to know each other, building professional relationships, trust and confidence, which are critical during an emergency.

During our follow-up, we noted that in June 2021, EMO had finalized a Provincial Exercise Program Framework for Ontario that it expects to form the foundation for a provincial multi-year strategy to test provincial emergency response plans. The strategy is based on a four-year cycle, with a full-scale provincial test being conducted every other year. However, EMO told us that the strategy has been delayed by the provincial response to both the COVID-19 pandemic and the 2021 wildfire season.

Despite the delays, EMO plans to begin implementing the initial phase of this strategy by the end of 2022. It also plans to conduct two full-scale nuclear exercises in 2022, in conjunction with some provincial partners, which will test two provincial plans. EMO also recently increased its staffing and created a new dedicated Exercise unit. EMO plans to implement this recommendation by March 2023.

- *revise the annual oversight process for ministries' and municipalities' emergency management programs to include an assessment of the quality of the programs;*

Status: In the process of being implemented by December 2025.

Details

During the 2020 special audit, we revisited a recommendation from our 2017 audit that EMO expand its oversight beyond reviewing self-assessment compliance checklists from ministries and municipalities

every year. We found that it had not implemented our recommendation, even though the self-assessments were insufficient to show whether ministries and municipalities were appropriately prepared to respond to the pandemic. For example, EMO's limited oversight failed to identify inaccurate statements in the Ministry of Health's 2019 self-assessment that it had reviewed its emergency response plans and updated them if needed; our review noted that its two plans relevant to COVID-19 had not been updated since 2013.

At the time of our follow-up, EMO told us that it continues to improve its compliance review processes and plans to include new qualitative assessment criteria as part of its review process. In addition, the 2021 compliance package for ministries added some recommended practices—such as analyzing staffing needs and increasing emergency management expertise by, for example, hiring specialized professionals—to improve the quality of their emergency management programs. As part of the 2021 compliance review process (which was completed in May 2022), EMO followed up to see if ministries adopted these recommended practices to improve the quality of their programs.

EMO also told us that it has begun a procurement process to seek advice on developing and incorporating further qualitative assessment processes for ministry and municipal emergency management programs. It plans to implement this recommendation by December 2025.

- *undertake a comprehensive review of the staffing needed at the Provincial Emergency Management Office and in the Provincial Emergency Operations Centre, including plans for surge capacity and specialized teams to be used during an emergency;*

Status: In the process of being implemented by March 2024.

Details

In our 2020 special audit, we noted EMO still lacked trained staff to assist the Provincial Emergency Operations Centre (Operations Centre) during a lengthy emergency response, an ongoing issue since our 2017 audit as well. Because EMO did not have a viable

plan to quickly ramp up its staffing with more hires or experienced volunteers, or to train other staff in the province to assist, some EMO program staff and some select staff from the Ministry of the Solicitor General were brought in to help at the Operations Centre during the pandemic. This, in turn, limited EMO's ability to assist municipalities and ministries, and ultimately to fulfill its role of provincial co-ordination during the pandemic. It also put most of the program work at EMO (such as preparing for nuclear emergencies and training emergency management staff in municipalities) on hold.

We noted during our follow-up that the Treasury Board Secretariat completed a staffing review to determine the staffing levels needed for EMO's operations. Based on this review, in January 2022, EMO added 69 staffing positions, which is an increase from 79 at the time of the special audit in 2020. During the 2022/23 fiscal year, additional funding of \$500,000 was provided for four new positions, along with an additional \$3 million which EMO stated was for 46 additional staff, prorated for the last six months of the fiscal year. As of September 30, 2022, a total of 136 positions were filled at EMO and recruitment was under way for the remaining positions.

However, we noted that EMO had not developed a surge capacity plan as a way of increasing staffing in the Operations Centre during an emergency; instead, it planned on using its existing staff. It told us that the additional staff approved gave it a far greater capability to meet the demands during an emergency. Our concern with this approach is that the review recommended staffing levels needed for EMO's day-to-day operations, but did not include additional surge staffing to respond to lengthy, large-scale emergencies. This approach could result in not enough surge staffing being available to assist in the Operations Centre. It could also limit EMO's other program operations, such as nuclear preparedness, training, compliance reviews and public education, for example, if staff are taken from these areas to assist in the Operations Centre.

EMO also has not yet implemented the All Hazards Incident Management Team, which it told us during our 2017 audit and 2019 follow-up that it planned to

implement to assist in the Operations Centre and in other ministries' emergency operations centres during emergencies. EMO told us that any further development of this specialized team will depend on future growth in EMO under the new organizational structure. EMO plans to implement this recommendation by March 2024.

- *determine the critical resources needed for all types of emergencies and then enter into agreements for those resources with preestablished rates;*

Status: In the process of being implemented by December 2025.

Details

During our 2020 special audit, we found that ministries still lacked agreements for goods and services that might be needed during an emergency, which we recommended in our 2017 audit. Such agreements could reduce delays in obtaining resources and also could help contain costs at a critical time by including fixed prices. Most of the ministries we reviewed in our 2017 audit had not even determined what types of resources they might need during an emergency. This had major repercussions at the beginning of the COVID-19 pandemic, when many municipalities were significantly short of personal protective equipment (PPE).

We also found that the Ministry of Health's stockpile of mostly expired PPE that we identified in our 2017 audit had worsened to include even more expired supplies that the Ministry of Health was paying to store. By comparison, our review of other provinces found that Alberta and Manitoba had obtained sufficient inventories of PPE and were able to send some supplies to Ontario, and that the emergency management offices in all of the provinces we reviewed had also helped obtain PPE for their provinces' non-health sectors (such as seniors' homes) and municipal emergency operations centres.

In our follow-up, we found that some amendments were made to the *Emergency Management and Civil Protection Act* through the new *Pandemic and Emergency Preparedness Act, 2022* in relation to our recommendation. The changes require ministries to identify the goods, services and resources needed to respond to

the risks and hazards they are responsible for, and to provide this information to EMO annually and upon request.

In addition, the Ministry of Public and Business Service Delivery (formerly the Ministry of Consumer and Government Services) introduced the *Personal Protective Equipment Supply and Production Act, 2022*. This Act requires the Province to maintain a stockpile of PPE and critical supplies and equipment. Further, the legislation requires the Minister to report on the status of the stockpile and the origin of the products in the stockpile annually.

Also, a terms of reference document has been developed for a new working group involving EMO, the Ministry of Public and Business Service Delivery and Supply Ontario to develop a supply chain and logistics program that addresses preparedness of resources, goods and services needed during an emergency. Supply Ontario is a new Crown agency that was established to transform and modernize Ontario's supply chain.

EMO told us that it expects to fully implement this recommendation by December 2025 after ministries have identified the resources needed to respond to the risks and hazards they are responsible for, as required by the new legislation, and then enter into agreements for those resources.

- *implement an effective IT system for province-wide use;*

Status: Fully implemented.

Details

In our 2020 special audit, we found that EMO had still not implemented a province-wide information technology (IT) system for emergency management, as we recommended in our 2017 audit. It had procured a new system and was in the early stages of implementing it, but it had not yet been rolled out province-wide. In the absence of such a system, EMO communicated inconsistently with stakeholders during the COVID-19 pandemic. This resulted in challenges in areas such as information-sharing, and identifying trends and issues.

In the follow-up, EMO told us that the new IT system for emergency management was being used

extensively in the Provincial Emergency Operations Centre. The system is designed to improve the tracking, reporting and management of emergencies. It allows information to be accessed by users across the province and can be used to communicate with other parties. It also includes a repository for critical information.

In addition, EMO has provided training and access to the system to EMO staff, to all ministry staff involved in emergency response, to some municipal staff (for example, those that were involved in recent flood and wildfire evacuation operations) and to other partners such as some federal government staff, First Nations, and Red Cross volunteers.

- *update continuity of government operations plans annually and implement a process to co-ordinate this work through the Secretary of Cabinet's Deputy Minister Council;*
- *maintain and update a prioritized listing of time-critical services in the province and related contact information.*

Status: In the process of being implemented by December 2022.

Details

In our 2020 special audit, we found that EMO did not have a prioritized list of Ontario's time-critical services when the Treasury Board Secretariat (Secretariat) asked for one to help allocate limited resources at the start of the COVID-19 pandemic. This is despite our 2017 report noting the importance of maintaining such a listing, and of ministries having continuity of government operations plans, where these time-critical services are prioritized. (In our 2019 follow-up, EMO told us it would not implement the recommendation for it to develop and maintain a listing of all time-critical services in the province.) Following the Secretariat's request, EMO prepared a list of time-critical services from information it requested from ministries, and it provided a final version to the Secretariat more than two weeks after the provincial emergency declaration was made.

In our follow-up, EMO told us that ministries are required to update their continuity of government operations plans on an annual basis in accordance with

the *Emergency Management and Civil Protection Act*. EMO receives these plans in January each year, reviews them and provides feedback to ministries as part of its annual compliance review process. In addition, EMO's 2022 Compliance Review guidance document, which it shared with Assistant Deputy Ministers in June 2022, reiterates the importance of continuity planning for government operations. However, a process had not yet been implemented to co-ordinate the annual update of these plans through the Secretary of Cabinet's Deputy Minister Council. This is because this process is intended to be within the scope of the planned executive-level (Deputy Minister level) committee for emergency management, which is expected to be implemented by December 2022.

EMO asked ministries to submit a list of their time-critical services, including related contact information, as part of their 2021 Compliance Review report submission. However, EMO has not yet compiled a prioritized listing of these time-critical services in the province. It is currently working on a framework for prioritizing this information based on the nature of the emergency, and it plans to have it completed by December 2022. EMO also needs to implement a process to ensure the prioritized listing is updated regularly.

Recommendation 4

To enable an effective and co-ordinated provincial emergency response for subsequent waves of COVID-19 and future emergencies, we recommend that the Ministry of the Solicitor General:

- *adopt the best practices noted in other jurisdictions, such as ensuring all parties are engaged and working together in the provincial emergency operations centre, providing direct support to municipalities, and providing timely information;*

Status: In the process of being implemented by March 2024.

Details

In our 2020 special audit, we found best practices in other provinces' actions during the first wave of COVID-19 that could be adopted by Ontario and EMO to improve their response in subsequent waves and

future emergencies. We identified specific areas of concern where these best practices could be applied, such as the response structure, the operations of the Provincial Emergency Operations Centre, staffing, staff wellness, support provided to stakeholders, and co-ordination of the response.

In our follow-up, we found that EMO regularly participates in Federal/Provincial/Territorial forums related to emergency management. These forums provide an opportunity to learn from and work with other jurisdictions to share information on approaches and best practices. However, EMO has not yet reviewed the best practices that we identified in other provinces in the special report, with a goal of adopting those that could improve the emergency management program in Ontario.

EMO previously committed to undertaking a full review of Ontario's emergency management system post-COVID-19 in order to assess areas for improvement and to build upon successes and learnings from the COVID-19 emergency. In November 2021, it began examining Ontario's emergency management program through an internal review of its legislation. As part of this review, it will look at best practices and lessons learned from the pandemic, with a goal of making improvements to Ontario's emergency management program. It expects to complete the review of best practices noted in other provinces and the review of its legislation, and adopt best practices, by March 2024.

- *determine the changes needed to make its provincial response structure as effective as possible, and implement them.*

Status: In the process of being implemented by December 2024.

Details

During our special audit in 2020, we noted that the provincial response structure outlined in the Provincial Emergency Response Plan was not followed during the COVID-19 pandemic. Instead, the Secretary of Cabinet urgently procured a consultant's services to establish a crisis response strategy, which included a new response structure that was put in place more than three weeks after the Province declared a state of emergency.

However, we found that the new structure was much more complicated than the response structure outlined in the Provincial Emergency Response Plan. It included many tables and sub-tables that caused confusion among emergency management representatives in ministries and municipalities because they weren't familiar with it. The structure they were familiar with and trained for was based on the Incident Management System (IMS), which is arranged specifically to reduce the risk of miscommunication, to avoid confusion and to enhance the efficiency of the overall response.

In our follow-up, EMO told us that the Province has regularly reviewed the response structure used for COVID-19 and believes it is effective for an integrated and cross-government response to the pandemic. It said that the response structure has been modified over the past year to ensure continued effectiveness.

EMO also told us that as part of the broader emergency management governance and oversight structure being developed, changes to the provincial response structure will be determined by building on existing approaches, including the response structure used for the pandemic. The changes identified will then be approved by the government.

Our concern with this approach is that if this response structure is to be used going forward, then the Provincial Emergency Response Plan should be updated accordingly so that all stakeholders are aware of the intended provincial approach. The related ministry response plans should also be updated to reflect this new structure, as we noted in our 2020 special report that the Ministry of Health's Ministry Emergency Response Plan and Ontario Health Pandemic Influenza Plan had not been updated since 2013, and the Provincial Co-ordination Plan for Influenza Pandemic had not been updated since 2006—and they had still not been updated at the time of our follow-up. Therefore, these plans are not in line with the response structure being used for the pandemic.

In addition, EMO has still not undertaken a full review of Ontario's emergency management system, which it committed to doing post-COVID-19 to assess areas for improvement and to build upon successes and learnings from the pandemic. At the time of our

follow-up, it was examining Ontario's emergency management program through an internal review of legislation that was initiated in November 2021. Any improvements noted in the response structure as a result of this review should be updated in the Provincial Emergency Response Plan. The Treasury Board Secretariat expects to implement this recommendation by December 2024, after the Provincial Emergency Response Plan is updated to reflect the Province's response structure.