



# BUSINESS PLAN

2020–2021

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## INTRODUCTION

This business plan outlines key priorities for the CMRAO. We will continue to fulfil our mandate in a manner that is effective, fair, and transparent, with a view to minimizing any burden on the sector and reducing red tape.

Although the present plan focuses on the 2020–21 fiscal year, it uses a three-year planning horizon, in line with the CMRAO’s current strategic plan.

## MANDATE

Designated pursuant to the *Condominium Management Services Act, 2015* (CMSA), the CMRAO is the regulatory body that protects consumers by setting standards and enforcing mandatory licensing of condominium managers and condominium management provider businesses.

## SECTOR OUTLOOK

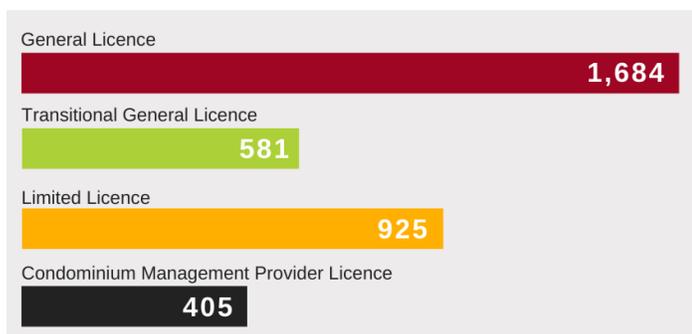
As of March 1, 2020, there were 3,193 licensed condominium managers in Ontario, including 1,684 General Licensees, 581 Transitional General Licensees, and 925 Limited Licensees.

Condominium managers and management companies provide services across the province, with heavier concentrations in Toronto and Central Ontario, where there are more condominiums relative to the rest of the province. Approximately 53% of condominium managers are between 40 and 59 years of age.

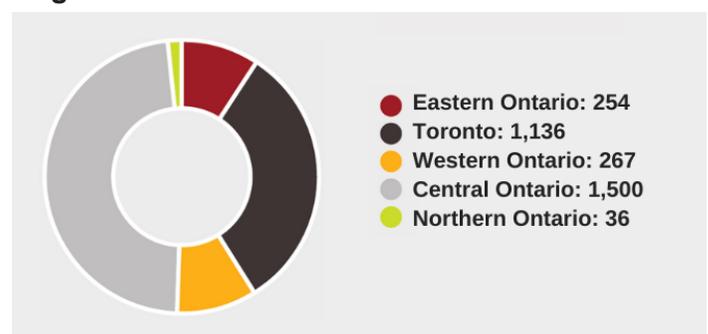
There are 405 licensed condominium management provider businesses in Ontario, of which 161 employ a single condominium manager, representing 5% of condominium managers in Ontario. The three largest companies employ 100 or more condominium managers each and represent 24% of condominium managers in Ontario.

Over the past two years, the CMRAO has seen consistent growth in the condominium management sector. As of March 3, 2020, there was a net increase of 468 new condominium managers compared to July 1, 2019. The CMRAO received an average of 68 new Limited Licence applications per month in the first eight months of the 2019–20 licensing year.

### Active Licences\*



### Regional distribution of licensees\*



\*as at March 1, 2020

## BUSINESS PLANNING OVERVIEW

The CMRAO is committed to sound business planning to effectively deliver its consumer protection mandate. This business plan outlines the priorities for the current year, whereas the annual report details the initiatives undertaken by the CMRAO during the previous year. The two documents can be used together to assess the organization’s performance and achievements moving forward.

Strategic planning is also integral to the business-planning process. In 2018, the Board of Directors approved the CMRAO’s first strategic plan for the period 2019–22. As part of this exercise, the Board established the CMRAO’s vision, mission, and values, and provided strategic directions to guide the organization’s business planning and reporting cycle.

Going forward, the CMRAO will strive to continuously improve and strengthen linkages between strategic planning, business planning, and annual reporting.

## STRATEGIC FRAMEWORK: MISSION, VISION, VALUES, AND OBJECTIVES

The strategic direction of the CMRAO was established by the Board of Directors to guide the operations of the organization towards achieving our goal of enhanced consumer protection through modern and effective regulatory activities.

These activities will be undertaken in the spirit of our values:

- **Building Trust** by carrying out our mission with integrity, accountability, and a commitment to fairness.
- **Protecting the Public** by using modern regulatory practices that enhance confidence in the professionalism of condominium management services.
- **Service Excellence** through our commitment to responsiveness, respect, and results in all our interactions with the public, the regulated community, and our partners.



### Mission:

To enhance consumer protection through modern and effective regulation of the condominium management sector

### Vision:

Public confidence that the assets of condominium communities are well managed and protected

### Our Values:

- Building Trust
- Public Protection
- Service Excellence

# STAKEHOLDERS

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The CMRAO's stakeholders are:

## **The Public**

The CMRAO is a non-profit organization dedicated to protecting the public and condominium communities and building trust in condominium management services. As a regulator, the CMRAO strives to improve how Ontario's condominiums are managed through licensing, education, and complaints resolution.

In 2019, the CMRAO established an Advisory Committee of volunteer members from the public and the Ontario condominium community. The Committee was instrumental in developing the competency profile for condominium managers, a key part of the CMRAO's education initiative. This committee will continue to provide input to the CMRAO on issues of importance to consumers and licensees, participate in consultations, and provide feedback on proposed policies and educational materials. The Ontario Ministry of Government and Consumer Services (MGCS) will be a partner at committee meetings and gain first-hand knowledge of stakeholder feedback to the CMRAO.

## **Condominium Management Sector and Industry Associations**

The CMRAO works with industry stakeholders to ensure that its rules and regulations support a competitive industry. The organization is also dedicated to promoting awareness of the regulatory system for condominium management.

The CMRAO has an active and engaged relationship with the Association of Condominium Managers of Ontario (ACMO) and other professional associations, such as the Canadian Condominium Institute (CCI), the Community Associations Institute (CAI), and the newly formed Condo Owners Council, and actively participates in events organized by these partners.

## **Ontario Ministry of Government and Consumer Services (MGCS)**

The CMRAO is an administrative authority designated under the *Condominium Management Services Act, 2015* (CMSA). The CMRAO is accountable to the Minister of Government and Consumer Services and the government for administration of the delegated provisions of the CMSA. We operate in accord with the provisions of the CMSA and an administrative agreement with the Minister of Government and Consumer Services.

## **Other Administrative Authorities**

The CMRAO is part of an administrative authority community and shares best practices and consults with different organizations on licensing and regulatory matters. The CMRAO shares some of its staff with the Condominium Authority of Ontario (CAO). On October 29, 2018, the CMRAO entered into a Memorandum of Understanding (MOU) with the CAO in order to collaborate on topics of interest to both authorities and contribute to consumer awareness campaigns. This MOU was reconfirmed on December 18, 2019.

## SERVICES

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There are approximately 1.6 million people living in condominiums in Ontario and more than 50% of new homes being built in the province are condominiums. There are more than 800,000 condo units in Ontario, up from 270,000 units in 2001.

Since November 2017, the CMRAO has provided the following services:

- Administering a mandatory licensing system for all condominium managers and management providers. The CMRAO licensing team verifies that only qualified individuals who meet the training and education requirements hold a licence.
- Providing prior learning assessment for applicants.
- Maintaining an online registry of licensed condominium managers and condominium management companies. The Public Registry contains information about licensees, including the status of their licence, conditions, suspensions, and revocations, as well as any disciplinary actions, and it is accessible to the public on the CMRAO website.
- Promoting and enforcing compliance with the licensing requirements outlined in the CMSA and regulations, including the Code of Ethics regulation. The CMRAO continues to develop resources to ensure that licensees make informed decisions and understand the conditions and requirements of their licence.
- Handling complaints about licensees by assisting in issues resolution, conducting inspections and/or investigations, holding discipline hearings, and taking corrective actions.
- Promoting public awareness of the regulatory system for condominium managers by actively engaging with condominium communities.

A Discipline Committee and an Appeals Committee were established to hear cases where licensees are alleged to have failed to comply with the Code of Ethics regulation, established by the CMSA.

In 2017, the Minister of Government and Consumer Services designated the courses and challenge exams developed by the Association of Condominium Managers of Ontario (ACMO) as the education and examination requirements necessary for applicants to qualify for a General Licence. This requirement will transfer to the Registrar of the CMRAO on November 21, 2021.

The CMRAO continues to focus on establishing its training and education initiatives for condominium managers, which will be implemented in 2021–2022, but this requirement will transfer to the Registrar of the CMRAO on November 21, 2021.

## FRENCH LANGUAGE SERVICES

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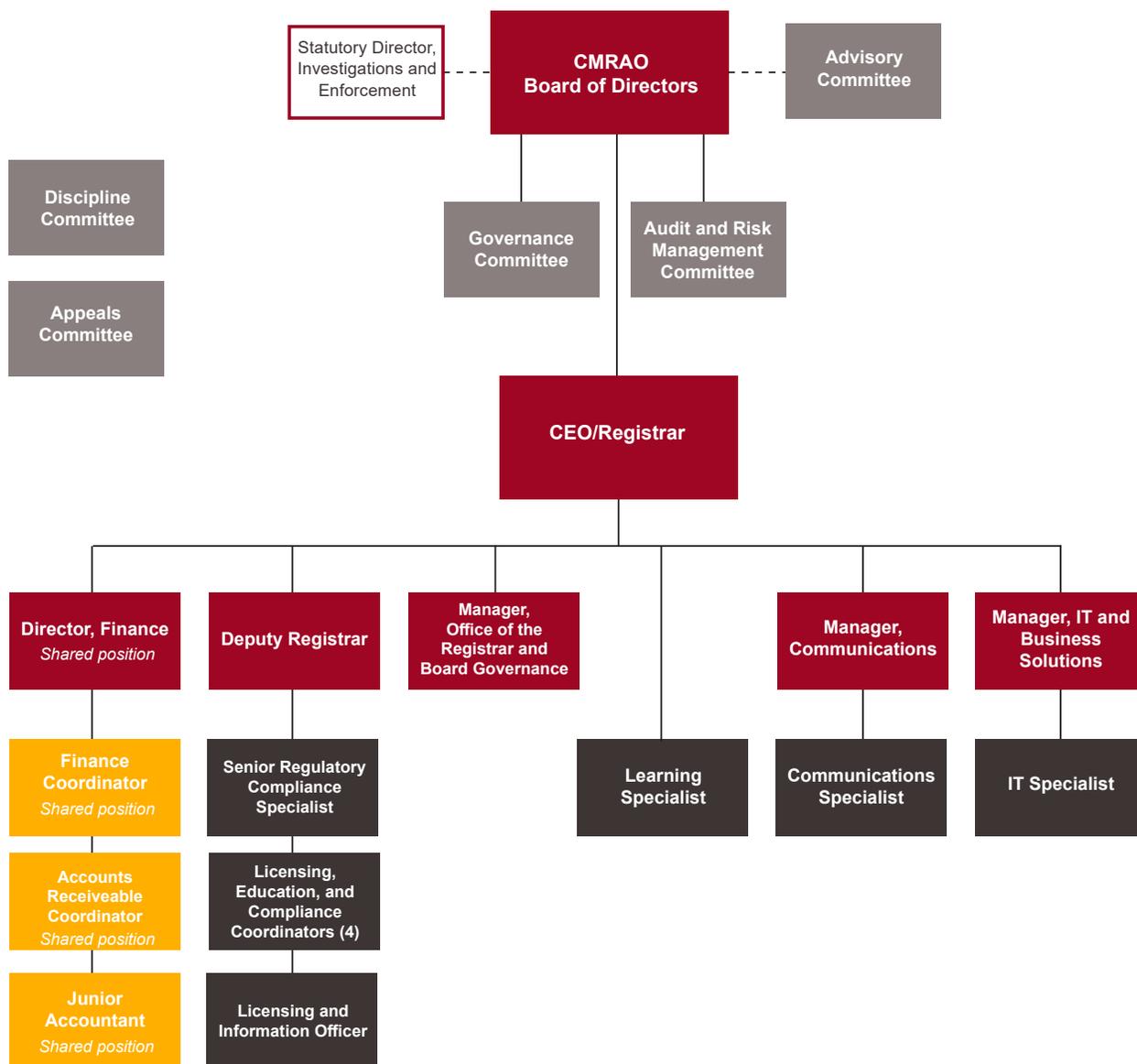
Ontario's condominium management sector is diverse and employs a number of francophone licensees. Members of the public have the right to communicate and receive available services from the CMRAO in French, as outlined in Section 26 of the CMSA. The CMRAO offers French language customer service, and the majority of the CMRAO's public-facing communications have been fully translated.

# CORPORATE STRUCTURE

The CMRAO operates with a lean, committed, and diverse team of full-time staff. To achieve our consumer protection mandate, the CMRAO maintains a dedicated team of licensing and compliance staff who are responsible for administering the licensing and compliance function. Under the leadership of the Deputy Registrar, licensing and compliance staff evaluate licensing applications and are available to handle complaints from the public or the licensed sector. The CMRAO shares Finance personnel with the CAO to achieve organizational efficiencies.

An independent Board of Directors composed of elected members and ministerial appointees has the mandate to oversee and guide the operations of the CMRAO. Board directors possess a wide range of skills, including expertise in condominium management, law, administrative authority governance, regulations, strategic planning, communication, risk management, and public policy.

The CMRAO has developed a skills and competency matrix to assist with recruiting and nominating new directors. Consideration is also given to diversity and regional representation to ensure that different areas of the province are represented on the Board.



## CORPORATE POLICIES

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The CMRAO maintains several Board-approved policies to guide the organization, which are available to the public on the CMRAO website ([www.cmrao.ca/about-cmrao/policies/](http://www.cmrao.ca/about-cmrao/policies/)).

### **Procurement Policy**

The Procurement Policy supports the CMRAO in its acquisition of goods and services to ensure that processes and procedures are transparent, economical, fair, and accessible.

### **Travel, Meal, and Hospitality Expense Policy**

The Travel, Meal, and Hospitality Expense Policy outlines the rules and accountability framework to reimburse travel, meal, and hospitality expenses while undertaking business on behalf of the organization.

### **Complaints Policy**

The Complaints Policy applies to complaints about the CMRAO services and the conduct of the CMRAO staff or members of the Discipline and Appeals committees. The procedures to submit complaints regarding CMRAO staff or services are outlined in the policy, which is available on the CMRAO website in both English and French ([www.cmrao.ca/about-cmrao/policies/complaints-policy/](http://www.cmrao.ca/about-cmrao/policies/complaints-policy/)). Accessibility accommodations are available upon request.

The process for submitting a complaint against a licensed condominium manager or condominium management provider business is detailed on the CMRAO website ([www.cmrao.ca/en-US/complaints/](http://www.cmrao.ca/en-US/complaints/)).

### **Access and Privacy Policy**

The CMRAO complies with applicable privacy legislation and this policy outlines how the organization protects and provides access to personal information and records.

### **Accessibility Policy**

The CMRAO's Accessibility Policy outlines the organization's commitment to removing barriers and ensuring that our services are respectful of the individual needs of people with different abilities.

Policies, practices, and procedures were developed to create an environment respectful to the needs and experiences of persons with disabilities.

The CMRAO will develop additional policies as required by legislation, the Administrative Agreement, or at the Board's direction.

## COMPLAINTS PROCESS

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The CMRAO's complaints process provides an impartial assessment of concerns regarding condominium management services provided by licensed managers and management provider businesses.

The CMRAO accepts complaints through the online complaints portal available on the CMRAO website ([www.cmrao.ca/complaints/submit-a-complaint-notice/](http://www.cmrao.ca/complaints/submit-a-complaint-notice/)).

Pursuant to Section 57 of the CMSA, in handling complaints the Registrar may do any of the following, as appropriate:

- Attempt to mediate or resolve the complaint
- Give the licensee a written warning that if the licensee continues with the activity that led to the complaint, action may be taken against the licensee
- Require the Principal Condominium Manager of the licensee to take further educational courses if the licensee is a provider of condominium management services
- Require the licensee to take further educational courses if the licensee is a condominium manager
- Refer the matter, in whole or in part, to the Discipline Committee
- Refuse, suspend, or revoke a licence or refuse to renew a licence
- Approve a licence or the renewal of a licence with conditions
- Apply conditions to a licence at any time
- Take further action as is appropriate in accordance with this Act

## STRATEGIC OBJECTIVES

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Over the next three years, the CMRAO intends to focus its efforts on successfully delivering on its mission and its strategic direction. The objectives set out in the strategic plan capture the CMRAO's goal to operate as a **Modern Regulator**, to focus on **Service and Operational Excellence**, and to achieve **Efficiency and Value for Money**. Internally, the CMRAO will aim to create a **Culture of Performance** while proactively seeking meaningful **Communication** with the public and promoting strategic **Stakeholder Engagement**. Each strategic objective is supported by concrete actions with measurable outcomes. The CMRAO will report on the outcomes of these actions and the achievement of its strategic objectives in the annual report.

# STRATEGIC OBJECTIVES AND ACTIVITIES

## 1. Modern Regulator

<b>Qualification, Education, and Licensing</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	<p>Develop policies to guide the efficient, province-wide delivery of educational programs for condominium managers</p> <p>Prepare for launch of new educational program in November 2021 by:</p> <ul style="list-style-type: none"> <li>• Establishing curriculum and course outcomes</li> <li>• Engaging educational partners</li> <li>• Developing policies to guide quality control of educational offerings</li> <li>• Defining all components of the service delivery model</li> </ul> <p>Promote compliance with existing educational requirements for all licensees</p>
2021–2022	<p>Implement the new condominium manager qualification program</p> <p>Promote compliance with existing educational requirements for all licensees</p> <p>Develop continuing education program</p>
2022–2023	<p>Monitor and improve educational activities</p>

<b>Regulatory Approach</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	<p>Implement a data-driven risk framework to prioritize our prevention, compliance, and enforcement actions</p> <p>Report publicly on inspection, compliance, investigation, and enforcement activities</p>
2021–2022	<p>Continuously evaluate and improve the complaints resolution processes</p> <p>Provide effective guidance and supports to the public and regulated community</p>
2022–2023	<p>Continuously evaluate and improve the complaints resolution processes</p> <p>Provide effective guidance and supports to the public and regulated community</p>

## 2. Service and Operational Excellence

<b>Customer Service Excellence</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	Promote a culture of excellent customer service Ensure a consistent application of our policies and procedures
2021–2022	Simplify how consumers and licensees access our services Continue to monitor the consistent application of policies and procedures
2022–2023	Continuously monitor and improve service delivery

<b>Continuous Operational Improvement</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	Evaluate and optimize our use of technology to support efficient and effective operations Apply lessons learned and best practices to continuously improve operations
2021–2022	Benchmark best practices against regulators in the province to identify and address areas requiring improvement
2022–2023	Undertake review of the CMRAO's IT system and develop a 5-year Information Technology (IT) plan

## 3. Efficiency and Value for Money

<b>Transparency and Cost Effectiveness</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	Review and refine internal controls/policies and monitor compliance Implement business practices to be lean and cost effective and manage fiscal resources so they are in line with the budget Report annually on activities and operations in the annual financial statements, which are audited by external auditors Support the Board's Audit and Risk Management Committee Periodically review and publish policies related to procurement and expenses Undertake a review of licensing fees annually
2021–2022	Make effective use of technology to improve business practices based on the analysis of data from previous years
2022–2023	Continue to monitor and improve business practices with a view to transparency

## 4. Culture of Performance

<b>Governance and Board</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	<p>Work to attract and retain a diverse, skills-based Board</p> <p>Review the CMRAO governance policies</p> <p>Develop a Board education plan</p> <p>Conduct an independent Board and governance evaluation</p>
2021–2022	Identify and address skill and experience gaps at the Board level
2022–2023	<p>Conduct an independent Board and governance evaluation</p> <p>Ongoing monitoring and enhancement of governance policies and processes</p>

<b>People and Culture</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	<p>Hire, motivate, train, and promote the best talent to nurture a culture of service excellence, innovation, and ethical behaviour</p> <p>Foster professional development of staff and support the development of in-house regulatory expertise</p>
2021–2022	<p>Continue to foster a culture of diversity, equal opportunity, and commitment to service</p> <p>Continue to foster a results-driven environment of innovation and ethical behaviour</p>
2022–2023	<p>Continue to foster a culture of diversity, equal opportunity, and commitment to service</p> <p>Continue to foster a results-driven environment of innovation and ethical behaviour</p>

## 5. Communication and Stakeholder Engagement

<b>Stakeholder Engagement</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	Develop and execute a stakeholder and community partners engagement strategy  Seek and establish collaborations with other administrative authorities in the province for the purposes of information sharing
2021–2022	Continue to engage and listen to our stakeholders and use their feedback to inform our service delivery
2022–2023	Continuously monitor and improve engagement strategies

<b>Public Communications</b>	
<b>Year</b>	<b>Activities/Strategies</b>
2020–2021	Develop and implement policies related to the transparent communication of regulatory decisions to the general public
2021–2022	Refine communications based on lessons learned from past activities and feedback from the public
2022–2023	Continuously monitor and improve communications strategies

## OUTCOMES AND PERFORMANCE MEASURES

The CMRAO sets strategic priorities, objectives, and performance measures in its annual business plan. Performance outcomes are then reported in the corresponding annual report. Setting these targets enables the CMRAO to maintain transparency and accountability to the public and its stakeholders.

The performance measures are based on the strategic priorities of the organization and includes internal measures related to service delivery standards, efficiency and value for money, and the CMRAO's organizational culture. In addition, the CMRAO will publicly report on key measures related to our regulatory mandate, customer service, and stakeholder engagement.

In 2019, a baseline for key performance measures was established. As the organization moves forward, a year-over-year comparison will be reported in the CMRAO's annual reports.

Performance Measure	Target
Successful development and implementation of the 2021 Education Plan	Curriculum and blueprint for education plan completed Program delivery plans to ensure supply and delivery across the province
Percentage decrease in number of licensees who were the subject of substantiated complaints and/or regulatory action <sup>1</sup>	5%
Percentage of licensees who report satisfaction with the level of service they have received from the CMRAO <sup>2</sup>	80%
Consumer satisfaction rating for the CMRAO's complaint-handling process <sup>3</sup>	60%
Percentage of consumers surveyed who are aware of the existence of the CMRAO and the requirement for condominium managers in Ontario to be licensed by the CMRAO <sup>4</sup>	25%

<sup>1</sup>A substantiated complaint is one where there is reasonable belief that the licensee may have breached the CMSA or regulations in some form (even if a minor infraction). For 2019–20, 80 licensees were the subject of a substantiated complaint (47 managers and 33 provider companies).

<sup>2</sup>This performance measure is based on the results of the annual satisfaction survey sent to all licensees.

<sup>3</sup>This performance measure is based on the results of the complaint survey, sent to every complainant as part of the complaints process.

<sup>4</sup>This performance measure is informed by the results of a public survey that polls Ontarians about their knowledge of the CMRAO and its mandate.

## RISK MANAGEMENT

The CMRAO aims to identify, assess, and manage any risks that may affect its ability to achieve its objectives, including protecting and serving its stakeholders and the public, and as such, assessing risks throughout the entire organization with a view to treat, monitor, and review it on a regular basis.

The CMRAO has established a Risk Register as a tool to record risk occurrences, risk significance, and our actions taken to mitigate the risk. By recording the risks that the CMRAO faces, a risk profile of the organization is created. Risk profiles are dynamic and change over time in step with the changes within the organization and in its external context.

In 2019, the Board established an Audit and Risk Management Committee to provide oversight of the CMRAO's risk management initiative and advise the Board on risk management policies.

### Summary of Possible Risks and Mitigation Strategies

Finance				
Risk	Objective	Likelihood	Impact	Mitigation Strategies
Temporary/permanent reduction in source revenue	<b>Service and operational excellence</b>	Low	Moderate	<ul style="list-style-type: none"> <li>Creation and maintenance of a reserve fund</li> <li>Adherence to procurement policy</li> <li>Regular review of actual spending through budget vs actual variance report</li> <li>Creation and maintenance of contingency fund separate from the reserve fund</li> <li>Close collaboration with industry associations and active engagement in the sector to understand trends and size of market</li> </ul>
Compromised financial processing and reporting capabilities		Low	Minor	<ul style="list-style-type: none"> <li>Restricted access to different areas of the financial system</li> <li>Restriction on posting entries</li> <li>Financial data stored and backed-up on cloud-based servers</li> <li>Monthly review of financial statements by the Audit and Risk Management Committee</li> </ul>

Risk	Objective	Likelihood	Impact	Mitigation Strategies
Failure to meet statutory requirements (CRA, WSIB, ESA, AODA, on pay equity) leading to potential fines	<b>Service and operational excellence</b>	Low	Minor	Regular compliance review to identify applicable changes in legislation Regular reporting to the Board Compliance checklist updated on a regular basis
Potential for internal fraud		Low	Moderate	Segregation of duties in the Finance department Insurance acquired with fraud option included

## Operational and HR

Risk	Objective	Likelihood	Impact	Mitigation Strategies
Ineffective regulations/policies leading to reputational harm for the CMRAO	<b>Modern regulator</b>  <b>Service and operational excellence</b>  <b>Culture of performance</b>	Low	Moderate	Close collaboration with the Ministry of Government and Consumer Services (MGCS) in drafting and reviewing regulations
Reversal of decisions by the Licence Appeal Tribunal (LAT) that could have implications for previous decisions		Low	Moderate	Regular consultation with legal counsel on all regulatory matters Training/education on LAT procedure and process
Absence of corporate policies, processes, and standard procedures leading to poor service levels		Low	Moderate	Corporate policies in place and reviewed annually Report on complaints and written service level standards (response times for i.e. complaints, emails, phone calls) in place, monitored and submitted quarterly to the Board Licensing processes documented and reviewed annually Human resources policies in place and reviewed annually

Risk	Objective	Likelihood	Impact	Mitigation Strategies
Loss of capacity/ inability to attract and retain key staff	<b>Service and operational excellence</b>	Low	Moderate	<p>Proactive monitoring of staff levels and implementation of succession plans</p> <p>Regular surveying of employee engagement</p> <p>Performance management framework</p> <p>Document and implement performance management policy and process</p> <p>Conduct salary benchmarking and review process</p> <p>Documented recruitment processes, including annual update to job descriptions</p> <p>Develop process and conduct exit interviews (including process to address negative reports)</p> <p>Report to the Board on any serious HR issues (including but not limited to terminations, investigations into harassment or discrimination, litigation, etc.) and results of employee survey, completion of performance management cycle</p>
Unsafe workplace leading to staff injury and legal liability	<b>Culture of performance</b>	Low	Minor	<p>Workplace Health and Safety Policy and Workplace Violence and Harassment Policy in place and implementation reviewed annually</p> <p>Active monitoring of workplace health and safety by Health and Safety Representative through monthly inspections</p> <p>Fire wardens and first aid trained employees in place</p> <p>Participation in regular fire drills</p> <p>Insurance acquired with workplace liability option included</p>

Risk	Objective	Likelihood	Impact	Mitigation Strategies
No contingency plan and or procedures in place in the event of a significant interruption to business operations	<p><b>Service and operational excellence</b></p> <p><b>Culture of performance</b></p>	Medium	High	<p>Continuity of Operations Plan in place and reviewed annually</p> <p>Employee contact information and notification plan in place</p> <p>Required IT equipment and access to all online resources are in place to be able to continue full work functions and conduct virtual meetings remotely</p> <p>Roles, responsibilities, and procedures in place to ensure continuity of business operations and to maintain communications and service to our licensees and stakeholders</p> <p>Continue to monitor official information sources pertaining to the event</p> <p>Operational and restricted reserve funds available to manage emergency situations</p>

<b>Governance</b>				
Risk	Objective	Likelihood	Impact	Mitigation Strategies
Misalignment between Board and management responsibilities		Low	Moderate	<p>Well-defined role descriptions for the leadership team and Board directors</p> <p>Ongoing Chair and CEO attention to ensure proper exercise of roles and responsibilities</p>
Lack of Board members due to unforeseen circumstances		Possible	Moderate	<p>Board terms staggered to avoid complete turnover and negative impact on committee membership</p> <p>Proactive relationship with the MGCS to encourage timely government appointments</p>

Risk	Objective	Likelihood	Impact	Mitigation Strategies
Board decisions compromised by lack of governance tools, education, skill, or personal agenda		Low	Moderate	<p>Establish a board Governance Committee</p> <p>Key policies in place and reviewed bi-annually (including Code of Conduct and Policy on Conflicts of Interest, Remuneration and Expense policy, etc.)</p> <p>Education Plan for Board directors</p> <p>Competency-based Board director selection process developed and implemented</p> <p>Board evaluation every two years</p> <p>Decisions made by the Board as a whole</p>

Information Technology (IT)				
Risk	Objective	Likelihood	Impact	Mitigation Strategies
Significant technology failure leading to inability to deliver services	<p><b>Modern Regulator</b></p> <p><b>Service and operational excellence</b></p> <p><b>Communication/ Stakeholder engagement</b></p>	Low	Severe	<p>Portal and website data stored and backed-up on cloud-based servers that can be easily retrieved</p> <p>Service standard agreement with vendor for various levels of fixes (critical, moderate, low)</p> <p>Daily back-up of all critical data</p>
Public-facing web portal spammed leading to flood of junk records created in the CRM system and interruption of services		Possible	Moderate	<p>Implement advanced defensive design strategies for the front and back-end of the portal</p> <p>Investigate each incident and provide custom solution as recorded in Risk Register</p>

Risk	Objective	Likelihood	Impact	Mitigation Strategies
<p>Breach of data security including protection of personal data leading to reputational liability and/or legal liability</p>	<p><b>Modern Regulator</b></p> <p><b>Service and operational excellence</b></p> <p><b>Communication/ Stakeholder engagement</b></p>	<p>Possible</p>	<p>Severe</p>	<p>IT resources monitored closely for competency and capacity for CMRAO</p> <p>Development and implementation of the CMRAO Business Continuity Plan</p> <p>Acceptable use, remote access and data security policies and procedures implemented</p> <p>Privileged User Access policy developed and acknowledged</p> <p>Provide data security and protection of personal data policies to the Audit and Risk Management Committee</p> <p>Role-based secure access to portals</p> <p>Mandatory password change every quarter</p> <p>Two-factor authentication implemented</p> <p>Upgrade service plan to “advanced threat protection” plan to improve IT security</p> <p>IT plan and operations based on industry best practices to be implemented and reviewed regularly (by external experts)</p>
<p>Website and portals down leading to inability of registrants to meet deadlines (outage over 72 hours)</p>		<p>Low</p>	<p>Moderate</p>	<p>Use established strategies to address outage situations</p> <p>Immediate communication with the sector through secondary contact system</p> <p>Staff trained to respond to inquiries in a reassuring manner</p>

Risk	Objective	Likelihood	Impact	Mitigation Strategies
Email spam, including spoofing emails or phishing emails	<p><b>Modern Regulator</b></p> <p><b>Service and operational excellence</b></p> <p><b>Communication/ Stakeholder engagement</b></p>	Almost certain	Minor to Moderate	<p>Upgrade CMRAO service plan to “advanced threat protection” plan to improve IT security</p> <p>User training on email/web security to avoid damage caused by accidental malware installation</p>
Prolonged loss of power (more than 24 hours) leading to loss of access to office		Possible	Minor	Staff can access the CMRAO portals and data remotely with their laptops as the system is cloud-based
Phone system outage leading to inability to accept calls from registrants and the public (outage more than 24 hours)		Possible	Moderate	<p>Public and registrants can use email to contact the customer care team</p> <p>Possible change of provider based on analysis of incidents</p> <p>Cell phones not dependent on phone system</p>
Loss of internet connection (outage more than 24 hours)		Low	Minor	<p>Staff would use data plans on cell phones</p> <p>Immediate communication through secondary contact system</p> <p>Staff would access cloud-stored data remotely from secure devices</p> <p>Use of cell phones for urgent communications</p>

## Stakeholder Communications

Risk	Objective	Likelihood	Impact	Mitigation Strategies
Loss of confidence due to bias, lack of competence, lack of integrity leading to negative media and/or breakdown in collaboration	<b>Communication/ Stakeholder engagement</b>	Low	Severe	<p>Ongoing Advisory process for direct input to the Board on matters of consumer protection</p> <p>Close collaboration with MGCS, adherence to Minister direction, frequent and transparent communications with MGCS</p> <p>Quarterly reporting on activities and initiatives</p> <p>Regular two-way engagement with the public and condominium sector through an established Advisory Committee</p> <p>Proactively monitor lack of confidence by the public and licensees to avoid negative media</p>
Real or perceived business/regulatory model failure leading to loss of reputation and public criticism		Low	Moderate	<p>Transparent reporting through business plans and annual reports available to the public</p> <p>Consultation with the sector and public on strategic topics</p> <p>Ongoing Advisory process for direct input to the Board on matters of consumer protection</p> <p>Establish positive relationship with new administration</p>
Negative media interaction (including social media) leading to loss of confidence in the CMRAO		Possible	Moderate	<p>Close monitoring of social media accounts</p> <p>Implementation of social media policy for staff and social media terms of use policy for the public</p> <p>Implementation of code of conduct and confidentiality policies for staff, limiting media interactions and exposure of confidential information</p> <p>Spokesperson policy and media training for identified managers and Board members</p>

# CONTINUITY OF OPERATIONS PLAN

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The Continuity of Operations Plan outlines the strategies, capabilities, and procedures for CMRAO staff to implement in the event of a significant disruption to its day-to-day business operations.

## Scope and Applicability

The scope of this plan covers all CMRAO departments. The plan is applicable in the event that the office is physically inaccessible, or in response to local or regional interruptions to operations, including:

- long-term building or wide area power failure
- nearby catastrophic event (such as gas leaks, train derailments, and chemical spills)
- severe weather events
- transit strike
- epidemic or pandemic events (infectious disease or other serious public health threat declared by health officials to be a public health emergency)

## Plan Objectives

The objective of the Continuity of Operations Plan is to facilitate the resumption of critical business operations, functions, and technology in a timely and organized manner so that the CMRAO can continue as a viable and stable business entity.

The CMRAO's Management Team is responsible for the activation and implementation of the plan, which includes roles, responsibilities, and procedures to ensure continuity of business operations, address systems connectivity requirements, maintain communications with employees, and deliver a high level of service to our licensees and stakeholders.

## HUMAN CAPITAL PLAN

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The CMRAO is committed to creating a work environment of collaboration where employees are treated fairly and with respect, and where the principles of diversity and inclusion are embraced.

The purpose of the present Human Capital Plan is to help the CMRAO meet its mission by engaging staff and stakeholders.

The CMRAO's Human Capital Plan is built on the following principles:

**Collaboration:** Seeking linkages with the Condominium Authority of Ontario, and with the various committees of the CMRAO, such as the Advisory Committee, the Discipline Committee, and the Appeals Committee

**Diversity:** Aiming to make diversity the cornerstone of every recruitment and selection process, whether for the CMRAO Board, committees, or staff

**Education:** Committing to education and promoting professional development across all levels of the organization, including staff, executives, Board directors, and committee members

Built on the strategic pillars of **Service and Operational Excellence** and **Culture of Performance**, the objectives of the Human Capital Plan include:

- Attract and retain a high-performing workforce with the technical and professional skills needed to achieve the CMRAO's mission
- Foster a results-oriented culture of innovation and ethical behaviour
- Support an organizational culture that encourages an inclusive workforce
- Ensure that all human capital processes, policies, and practices are evaluated, and that implementation is monitored

In 2019, the CMRAO was certified as a **Great Place to Work** by the Great Place to Work Canada Institute—a research and management consultancy. The institute is the global authority on building, sustaining, and recognizing high-performing workplace cultures, and has over 30 years' experience in recognizing award-winning organizational cultures across a variety of industries.

The CMRAO staff completed a Trust Index Survey used to assess the employee experience (the survey measures employee perceptions of credibility, respect, and fairness), and the result was a trust index of 85%. By comparison, the average trust index of organizations is approximately 70%.

## Human Capital Plan: Supporting Strategies and Performance Measures

Objective	Supporting Strategy	Performance Measures
Attract and retain a high-performing workforce with the technical and professional skills needed to achieve the CMRAO's mission	Hire, motivate, train, and promote the best talent in line with our values	Fill positions in 90 days from needs analysis to posting to offer
	Retain current high-performing staff through proactive engagement and professional development opportunities	Low turnover rate Number of training hours Percentage of staff engagement levels
Support a healthy organizational environment that encourages staff to achieve goals and is representative of the province's diversity	Ensure that the performance management system is reflective of the values of the CMRAO	Percentage of employees meeting or exceeding performance expectations
	Emphasize a culture of diversity, equal opportunity, and professional development	Percentage of staff satisfied with diversity and inclusion initiatives Percentage of staff satisfied with equal-opportunity initiatives
	Develop an enterprise approach to health and wellness that focuses on a healthy work environment, flexible workplace options, and employees' wellness	Low rates of absenteeism Percentage of employees aware of accessible work arrangements offered by the CMRAO
Ensure that all human capital processes, policies, and practices are reviewed, evaluated, and easily accessible	Annually update all human resources and health and safety policies to reflect organizational changes and ensure compliance with provincial legislation and regulations	Policy audits

## RESOURCES

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As a not-for-profit corporation that is funded solely through regulatory fees charged to our licensed businesses and individuals, the CMRAO is committed to the prudent management of our financial resources to ensure we provide value for money. The CMRAO is committed to being transparent and accountable for the efficient use of these fees that allow us to effectively carry out our mandated responsibilities as the regulator of the condominium management sector. As such, we aim to undertake the following commitments:

- **The CMRAO will be transparent about operating cost structures and financial position:**
  - Adhering to expense and procurement policies that meet the spirit and intent of provincial government practices. Audited financial statements are prepared and made publicly available every year, and three-year financial forecasts are published in every business plan.
- **The CMRAO will develop and adapt its business practices to remain lean and cost effective:**
  - Approving annual allocation of funds and reviewing financial reports at quarterly Board meetings. Through its engagement in financial planning the Board ensures that the CMRAO's activities for the ensuing year(s) are adequately resourced.
  - Ensuring strict control on spending within budget; a monthly report of Budget vs Actual will be prepared and presented to the Board.
  - Making each department head responsible for their budget with added oversight from the Director of Finance and Controllershship.
  - Reviewing its business operational activities on an ongoing basis, focusing on cost drivers to ensure the cost-effective utilization of resources.
  - Embracing technology and outsourcing in pursuit of the cost-effective way of doing business.
  - Budgeting reflects the appropriate yet lean organizational structure.
  - Performing annual enhancements to the IT system.
  - Starting in 2019–20, the CMRAO will pay an oversight fee to the Ministry of Government and Consumer Services (MGCS) under the administrative agreement.
  - Implementing its reserve policy and a portion of revenue will be contributed to the reserve fund.

# FINANCIAL PROJECTIONS

## Three-year financial outlook

The CMRAO establishes a detailed operating budget before the beginning of each fiscal year. The following is a financial outlook based on a forecast of anticipated revenues and planned expenditures for a three-year period (2020–2023). This outlook will be reviewed and updated as required.

	2020–21	2021–22	2022–23
<b>Revenues:</b>			
Licensing Fees	2,860,193	2,897,369	2,953,876
Other Income	50,000	50,000	50,000
<b>Total Revenues</b>	<b>2,910,193</b>	<b>2,947,369</b>	<b>3,003,876</b>
<b>Expenditures:</b>			
Human Resources/Board	1,746,285	1,806,285	1,866,285
Operating	907,812	857,812	857,812
Capital	30,000	30,000	30,000
MGCS oversight fee	198,000	198,000	198,000
<b>Total Expenditures</b>	<b>2,882,100</b>	<b>2,892,100</b>	<b>2,952,100</b>
Restricted Reserve Fund	25,000	40,000	40,000
<b>Net Surplus/(Deficit) for the period</b>	<b>3,093</b>	<b>15,269</b>	<b>6,777</b>

The above budget assumes that any costs incurred for delivering educational programs will be recovered through corresponding program fees.



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