



Ontario Land Tribunal

Business Plan

2024/25 - 2026/27

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Section 1: Executive Summary

The Ontario Land Tribunal (OLT) produces an annual Business Plan, in accordance with the [Adjudicative Tribunals Accountability, Governance and Appointments Act](#). This Business Plan covers the next three fiscal years from April 1, 2024 to March 31, 2027.

The OLT adjudicates matters related to land use planning, environmental and natural features and heritage protection, land valuation, land compensation, municipal finance, and related matters. Because these disputes may have significant economic impacts and also affect the housing supply, it is critical that the OLT resolves matters in a timely and fair manner.

The OLT was established on June 1, 2021, under the authority of [section 2 of the Ontario Land Tribunal Act, 2021](#). The Act amalgamates the Board of Negotiation under the *Expropriations Act*, Conservation Review Board, the Environmental Review Tribunal, the Local Planning Appeal Tribunal and the Mining and Lands Tribunal and continues them as the OLT. The history of the predecessor tribunals dates back more than a century with the creation of the Ontario Railway and Municipal Board in 1906.

The goal of the new OLT is to reduce delays and to make the land dispute resolution process more efficient by creating a single forum to resolve disputes faster by eliminating unnecessary overlap between cases. The OLT developed several key products to integrate and create efficiencies in the appeal process of the predecessor tribunals. The new Rules of Practice and Procedure came into effect on June 1, 2021, to create a single set of rules and procedures for all OLT appeals/applications.

Resources were created to provide information and assist the public in navigating the various proceedings of the OLT. A single appeal form, instructions and checklists were created to streamline the appeal filing process. OLT guides were developed to provide information on filing an appeal, the hearings process and hearing submissions. Additional video guides, on topics such as how to request party or participant status, are under development. The OLT remains dedicated to ensuring access to justice and enhancing operational efficiencies. Several initiatives are underway for the upcoming years to enhance public service and streamline the appeals process.

On March 30, 2022, the government announced an investment to increase resources at the OLT so homes can be built faster, addressing a key recommendation in the [Report of the Ontario Housing Affordability Task Force](#). The government further invested resources into the OLT following the introduction of *The More Homes Built Faster Act, 2022*, which received royal assent on November 28, 2022.

The additional resources have allowed the OLT to increase the number of Order-in-Council (OIC) members and case processing staff, expand its mediation program and improve its digital services. The resources have strengthened the OLT's capacity to deliver efficient and effective dispute resolution services.

The OLT is committed to providing high-quality, fair, expeditious and principled resolutions of the matters brought before it. Tribunal decisions are based on the facts, the applicable law and policy, and on the merits of the case.

Section 2: Overview & Mandate

The Ontario Land Tribunal (OLT) adjudicates and mediates matters related to land use planning, environmental and heritage protection, expropriated land valuation, mining and other matters. As these disputes may have significant economic impacts and also affect the housing supply, it is critical that the OLT resolves matters in a timely and fair manner.

The OLT resolves disputes on issues throughout the province and promotes the early resolution of a multitude of matters using a variety of dispute resolution methods. It processes disputes from intake to closure, which may include issuance of decisions, orders and recommendations arising from pre-hearings and mediations, settlement conferences and, if required, a formal hearing. Proceedings are heard by highly qualified members assigned to each matter.

Mandate

In accordance with the [Ontario Land Tribunal Act, 2021](#), the OLT will fairly, effectively and efficiently resolve disputes related to land use planning, environmental and natural features and heritage protection, land valuation, land compensation, municipal finance, and related other matters as authorized by statute and regulation.

Mission

We deliver modern, fair, responsive, accessible, effective and efficient dispute resolution services that support strong, healthy communities and the public interest.

Section 3: Environmental Scan and Risks

External Factors

Flexible Hearing Approaches for Effective Dispute Resolution

Presently, the majority of the OLT hearing events are held virtually through video conference calls, as it is the most efficient and effective method in most cases. However, recognizing the importance of public interest, the OLT has implemented a live-streaming policy, allowing for remote public access in such cases.

Requests for in-person or hybrid events, are considered on a case-by-case basis. This approach ensures flexibility, particularly when resolving complex matters, where an in-person or hybrid format may be more appropriate to guarantee effective and efficient dispute resolution.

Housing Supply

The government is taking action to address Ontario's housing supply crisis by helping to build at least 1.5 million homes by 2031. Development involves decisions to use land within the legislated framework, including the Provincial Policy Statement and Provincial Plans. These decisions often have impacts on the built and natural environments. The OLT plays a critical role in resolving disputes related to land development and associated environmental issues. In doing so, the work of the OLT supports Ontario's economic and environmental well-being, the health of its communities and citizens while providing a forum to resolve complex planning matters that would help create housing.

When governments adopt policies to invest in infrastructure projects to stimulate the economy, additional cases can be generated for the OLT in matters that involve the *Expropriations Act*. For example, large transportation projects could require significant expropriation of land, which will result in a large increase in mediations and hearings under the *Expropriations Act*. Municipalities adopt a variety of methodologies to finance capital projects, some of which generate cases related to development charges, land compensation and municipal finance applications at the OLT.

Increase to OLT resources

On March 30, 2022, the government announced an investment of \$14.7 million over three years to increase resources at the OLT so homes can be built faster, addressing a key recommendation in the [Report of the Ontario Housing Affordability Task Force](#). This investment supports faster OLT case resolution by:

- Funding fourteen (14) new OIC member positions and additional case processing staff including case coordinator-planners, decision administrative assistants, and intake and scheduling staff
- Creating flexibility to address caseload trends by appointing more part-time OIC members
- Expanding the use of expert land use planning mediators to help settle disputes earlier and narrow issues for faster adjudication
- Improving IT platforms to improve access to services online

As announced in the 2023 Budget, the government invested an additional \$11.8 million over three years to help the OLT speed up case resolution, improve client service and support faster housing creation, by:

- o Hiring more support staff;
- o Investing in technology for digital and hybrid hearings;
- o Improving client service via phone and web channels; and
- o Enhancing its case management system.

The new 2023 funding continues the additional \$2.5 million one-time funding that was announced for the OLT as part of the More Homes Built Faster: Ontario's Housing Supply Action Plan 2022-23.

The OLT recognizes that it plays an important role in the province's housing supply and remains committed to providing principled and timely resolutions of the matters before it. The investments will allow the Tribunal to schedule hearing events and issue decisions quicker and more efficiently than before and allow the OLT to provide an even higher quality of service to Ontarians.

More Homes Built Faster Act, 2022

On November 28, 2022, the *More Homes Built Faster Act, 2022* received royal assent. The Act, which includes amendments to the *Ontario Land Tribunal Act, 2021* (OLTA), supports Ontario's long-term strategy to increase the housing supply by 1.5 million homes over the next 10 years. Once proclaimed, the amendments to the OLTA will:

- Clarify the OLT's powers to dismiss appeals due to unreasonable delay by parties in accordance with its rules.
- Clarify the OLT's powers to order an unsuccessful party to pay a successful party's costs in accordance with its rules.
- Enable priority criteria for OLT cases that could create the most housing to be established in regulation.
- Enable service standards (i.e., timelines) for specific case resolution activities at the OLT to be set in regulation.

Internal Factors

Recruitment of new OIC Members

Adding to the Tribunal's OIC member complement is a key priority for the OLT. With additional funding for fourteen (14) new full-time OIC member positions and greater flexibility to appoint part-time members, the OLT is focused on the recruitment of members and is determined to quickly fill vacancies to reduce time to hearing and so that decisions can be issued faster.

Appointments & Succession Planning

A full membership is critical for the timely issuance of OLT decisions and resolution of cases. OLT decisions are made by OIC members who are appointed by the Lieutenant Governor-in-Council for an initial term of up to two years and are subject to renewal for a maximum of 10 years in a given position, upon the recommendation of the Chair. The OLT continues to account for succession planning and the continual recruitment of members to quickly fill vacancies as they arise to minimize disruptions in the hearing of and resolution of the matters before it.

Section 4: Strategic Directions and Implementation Plan

The Ontario Land Tribunal (OLT) is committed to providing access to justice and to high quality, independent, timely, fair and principled resolutions of the matters brought before them. To achieve this, the OLT has developed the following four pillars and initiatives to improve its services to the public.

Access to Justice

The OLT is committed to improving access to justice for those that come before it and is seeking ways to improve information and resources to increase public understanding of the OLT and its processes. The OLT currently provides resources regarding the appeals process on its website, and staff are available for public inquiries and to provide additional assistance. The OLT strives to clearly explain its processes for the public and seeks to remove systemic barriers in its procedures.

- **Development of Resources:** Creation of additional resources, such as video tutorials and simplified guides, regarding the appeals process to assist the public in managing their case before the OLT.
- **Improved Customer Service:** Additional resource allocation and modernization efforts to public inquiry and communication services to allow for faster service when contacting the OLT.
- **Addressing Systemic Barriers:** Through training on diversity, inclusion and anti-racism, OLT seeks to remove systemic barriers.

Digital Service Delivery

The OLT has recently introduced a number of digital services to the public, including the implementation of video hearings and a new secure online submission of documents service for the tribunal. As the need for digital services continues to grow, OLT will strive to expand and improve its online services to the public and is seeking to increase its digital offerings to the public.

- **Improved Web Experience:** Revised public facing website to enhance the user experience and provide users with easy access to information on the OLT's cases and processes through improved content design.
- **Online Appeal Filing and Fee Payments:** OLT will implement a web-based option for submission of appeals and fees.
- **Video Hearings:** OLT will monitor trends and technology across the OPS and more broadly in the public sector to ensure appropriate technology is in use for video hearings.

Finding Efficiencies

The creation of the OLT has allowed for increased efficiencies in its dispute-resolution processes, and it continues to find ways to improve its services and where appropriate allow for a more efficient appeals process.

- **LEAN:** In 2022-23, the OLT imparted LEAN principles and practices training to all its staff, integrating this knowledge into its onboarding process. The OLT will continue to train staff and apply LEAN methodologies to enhance processes and shorten timelines.
- **Mediation:** In 2022-23, the OLT expanded its mediation services to facilitate the early resolution of complex, contentious and sensitive matters, offering assistance to settle issues between parties at anytime in a proceeding on a voluntary basis.
- **Key Performance Indicators:** In 2021-22, the OLT implemented a new case management system for the integrated tribunal. In 2022-23, the OLT developed new reporting tools and has established two public facing performance measures. The OLT will continue to develop and refine further performance indicators.
- **Timely Dispute Resolutions:** In 2022-23, the OLT aimed to issue decisions within 30 to 60 days following the hearing event. The OLT is committed to continue issuing its decisions as quickly as possible, resolving matters in a timely and fair manner.

People & Culture

In its efforts to develop a workplace culture of inclusion and acceptance, the OLT is dedicated to providing the necessary resources to improve the health and wellness of its Members and staff.

- **Diversity, Inclusion and Anti-Racism:** Facilitate equity and inclusionary professional development and training to build diversity and inclusion and anti-racism competencies.
- **Fair Hiring Practices:** Improved recruitment processes, including resume redaction to reduce potential biases, to support inclusive and fair hiring practices.
- **Professional Development:** OLT is committed to the ongoing training and professional development of its members and staff. OLT will be establishing new processes to identify and deliver training and to track the completed training of all staff and members.
- **French Language Services:** Following the establishment of the Tribunal, OLT will review, refine and expand its French Language Services.

The OLT is committed to fostering an inclusive culture that prioritizes wellness, learning and development. This dedication extends to creating a workplace environment characterized by inclusion and acceptance. We have actively implemented professional development initiatives, focusing on diversity and inclusion, to provide continuous support for both members and staff.

As we move forward, we look forward to taking additional steps guided by the valuable feedback gathered during our quarterly townhalls. The input from both members and staff is crucial in shaping our future initiatives, with the goal of creating a more vibrant and connected culture at the OLT.

Strategic Directions and Implementation Plan Table

The following table summarizes the initiatives under the four pillars:

Initiative	Activity	2024-25	2025-26	2026-27
Access to Justice	Video Guides	Monitor and Refine	Monitor and Refine	Monitor and Refine
	Improved Customer Service	Expand and Refine	Monitor and Refine	Monitor and Refine
	Addressing Systemic Barriers	Monitor and Refine	Monitor and Refine	Monitor and Refine
Digital Services	Improved Website	Monitor and Refine	Monitor and Refine	Monitor and Refine
	Case Status	Monitor and Refine	Monitor and Refine	Monitor and Refine
	Online Appeal Filing & Payment	Implement	Monitor and Refine	Monitor and Refine
	Video Hearings	Monitor and Refine	Monitor and Refine	Monitor and Refine
Modernization and Efficiency	LEAN approach	Expand and Refine	Expand and Refine	Monitor and Refine
	Mediation	Expand and Refine	Monitor and Refine	Monitor and Refine
	Key Performance Indicators	Expand and Refine	Monitor and Refine	Monitor and Refine
People and Culture	Diversity, Inclusion & Antiracism	Expand and Refine	Monitor and Refine	Monitor and Refine
	Hiring Practices	Monitor and Refine	Monitor and Refine	Monitor and Refine
	Professional Development & Culture of Learning	Expand and Refine	Monitor and Refine	Monitor and Refine
	French Language Services	Monitor and Refine	Monitor and Refine	Monitor and Refine

Section 5: Staffing and Human Resources

The Ontario Land Tribunal (OLT) is led by the Chair, who is accountable to the Minister (Attorney General) for the performance of the OLT in fulfilling its mandate.

OLT decisions are made by adjudicators who are appointed for fixed terms by Orders-In-Council made by the Lieutenant Governor-In-Council on the recommendation of the Chair, Minister and approved by Cabinet. Adjudicators report to the Chair.

The organization is also led by an Executive Director, who is responsible for supporting the Chair in the implementation of the OLT's policies and operational decisions. The Executive Director is accountable to the Deputy Attorney General for the management of the OLT's operations. Staff are Ontario Public Servants and report to the Executive Director. The OLT has a total of 106 allocated full-time positions, including 45 appointed members.

Ontario Land Tribunal Human Resource Allocation (as of December 31, 2023)

Group	Number of Positions
Executive Management Group	1
Crown Counsel (CC5)	1
Association of Law Officers of the Crown (ALOC)	5
Management Compensation Plan (MCP)	9
Association of Management, Administrative and Professional Crown Employees	30
Ontario Public Service Employees Union (OPSEU)	59
Excluded	1
Sub-Total Staff	106
Order-in-Council (OIC) Full-time Members	45
Total	151

Section 6: Information Technology (IT) / Electronic Service Delivery (ESD) Plan

The Ontario Land Tribunal (OLT) prioritizes the fair, timely and efficient resolution of disputes. The OLT strives to provide the appropriate supports to those who appear before the Tribunal and to empower people to be active participants.

Hearings

Since 2019, the OLT has held hearing events through video conferences, demonstrating a commitment to ensuring access to justice for the public. Recognizing the importance of adaptability, the OLT offers a range of options for hearings, including hybrid and in-person events, leveraging modern technology installed in its hearing and mediation rooms.

The OLT will maintain its live-streaming policy. In cases where the OLT determines that a specific hearing event will be livestreamed, it is made publicly accessible via a YouTube link provided to observers.

The OLT is continuing to review advancements in technology in these areas. Where possible, the OLT will look to improve the technology in use to simplify administration and to increase ease of use for the public.

Website

In 2022-23, the OLT launched a revised public website with a focus on enhancing the user experience and providing users with a better understanding of the OLT's cases and processes through improved content design. The website is essential for enhancing communication with the public and providing information on OLT processes, cases and hearings. The OLT will continue to develop and expand the website services and functionality.

Case Management System

The OLT has launched a new case management system that integrates and modernizes the case management systems utilized by its predecessor tribunals. Work continues on the case management system, including development of business intelligence reporting and facilitating e-services within the public facing website. In 2022-23, an online case status service was launched. In 2023-24, a new online appeal filing service will be launched. The OLT will look to further development of the case management system leveraging additional automation to improve timeliness and efficiency.

Section 7: Communications Plan

The Ontario Land Tribunal (OLT) is committed to providing a high quality of service to the public in keeping with its core values of accessibility, diversity, fairness, transparency and timeliness.

Consultation Policy

The OLT has established a Consultation Policy that outlines how the OLT will consult with the public when it is considering changes to its rules, practice directions or policies, and invites ongoing feedback on the impact of such changes. The OLT will use its website to provide notice of proposed changes to the public and stakeholders, giving reasonable time periods for comments to be submitted on proposals for changes initiated by the OLT.

Public-Facing Website

The OLT is committed to delivering initiatives that educate the public, stakeholders and self-represented parties on the role and processes of the OLT in a clear, open and understandable way. In this regard, the OLT website is a key communication portal to provide information to those accessing the OLT's services. News updates are regularly posted on the website to inform the public of any major changes pertaining to the Tribunal or recent updates on the website, such as the posting of accountability documents, updates to Tribunal processes, or important legislative changes.

The website also contains several information products to assist the public with understanding the OLT's processes, including appeal and video hearing guides, and continues to review these products to ensure they are accurate and accessible.

Public Inquiries

The OLT provides multiple avenues for members of the public to contact the Tribunal. Members of the public can contact the OLT via its general inquiry lines or its Citizen Liaison for information on the Tribunal and its processes. Inquiry lines are staffed during business hours, while messages can be left after hours to be returned the following business day. Persons involved in a matter before the Tribunal also have access to the Tribunal via their Case Coordinator. Members of the media have a dedicated media inquiry email for any inquiries. The OLT maintains service standards to ensure that all inquiries received by the OLT are responded to in a timely manner.

The OLT has a dedicated Complaints Coordinator to facilitate complaints received through the OLT's Complaints Policy. This policy sets out how complaints about the OLT's services and/or the conduct of an adjudicator or staff person are to be made, reviewed and resolved. The OLT also has dedicated channels for inquiries regarding accessibility and French Language Services.

Internal Communications

The OLT has made efforts to stay connected through in person and virtual activities, workshops and quarterly newsletters.

To address one of the challenges of remote work, there are ongoing initiatives to deliver sessions where staff and OIC members have opportunities to collaborate in a virtual environment. A comprehensive electronic library supports professional development across the OLT, and virtual professional development events and opportunities are also made available. New content is developed on an ongoing basis to assist adjudicators and staff in their work and to address legislative and policy changes.

Section 8: Diversity and Inclusion Plan

The Ontario Land Tribunal (OLT) is committed to building a diverse and inclusive environment to reflect the public we serve and respond to the needs of diverse stakeholder groups. Diversity objectives and outcomes in policies, processes and services ensure the public, staff and Order-in-Council (OIC) Members have access to a space that is free from harassment and discrimination.

Anti-Racism Action Plan

In alignment with the Ontario Public Service Anti-Racism Policy, the OLT has implemented an Anti-Racism Action Plan to support the advancement of anti-racism work across government, which will be updated every fiscal year. The plan currently focuses on six initiatives:

- 1. Anti-racism competency and capacity training for all OLT managers:** Executive and senior management team to complete anti-racism competency training.
- 2. Review of hiring practices:** Executive management to review hiring practices for alignment with OPS diversity initiatives.
- 3. Review of on-boarding materials:** Ensure that new staff take anti-racism competency training as part of onboarding.
- 4. Review of succession planning:** Senior management to review succession planning for opportunities to enhance planning to reflect OPS diversity initiatives.
- 5. Model expectations and behaviours through performance management commitments for all levels of the organization:** Review performance management templates to ensure they include commitments to behaviours that reflect anti-racism initiatives.
- 6. Management to consult with staff on further development of the Anti-Racism Plan for OLT:** Management to consult with staff on further developing the OLT Anti-Racism Action Plan.

The OLT is ensuring accountability by outlining specific accountability metrics, timelines for results, and monitoring accomplishments throughout the year. The OLT will continue to review and revise the plan at the beginning of each fiscal year to ensure meaningful progress and results.

French Language Services

The OLT is committed to offering French language services in accordance with the [French Language Services Act](#) (FLSA), and has established a [French Language Services Policy](#) to comply with the provisions of the FLSA in guaranteeing all persons and corporate entities the right to receive services in French.

Inquiries regarding French language services and French language services requests can also be made through the OLT Coordinator.

Section 9: Accessibility Plan

The Ontario Land Tribunal (OLT) supports the full inclusion of persons with disabilities as set out in the Canadian Charter of Rights and Freedoms, Ontario Human Rights Code, the [Ontarians with Disabilities Act \(ODA\), 2001](#) and the [Accessibility for Ontarians with Disabilities Act \(AODA\), 2005](#).

Accessibility Policy

The OLT is committed to providing services in accordance with the Accessibility Standards for Customer Service made under the AODA. In keeping with this commitment, the OLT will continue to review and update its [Accessibility Policy](#) to ensure alignment and compliance with the AODA.

Mandatory Training

New staff are trained on their responsibilities to provide inclusive and accessible services and are expected to complete accessibility training modules accordingly.

Accessibility Requests

Inquiries regarding accessibility and accessibility requests can be made through the OLT's Accessibility Coordinator. The OLT also ensures that its website and any publicly available documents are readily available in accessible formats.

Procurement of Services

In procuring services, the OLT ensures that vendors meet the required accessibility standards in the products and services it provides.

Section 10: Financial Plan

The chart below outlines the budget and forecast for the Ontario Land Tribunal (OLT) for the 2023-24 fiscal year, for the time period of April 1, 2023 to March 31, 2024. It also includes the budget for the following three fiscal years (2024 to 2027). The OLT's filing fees are anticipated to remain unchanged until 2026-2027.

Revenue in the form of filing fees received by the OLT is transferred into the Government of Ontario's Consolidated Revenue Fund (CRF).

Expense Category	2023-24 Budget ¹	2023-24 YE Forecast ²	Explanation of Variance	2024-25 Budget	2025-26 Budget	2026-27 Budget
Operating						
Salaries and Wages (S&W)	13,512,800	11,293,300	Savings due to delay in staff hiring and OIC appointments	13,593,500	13,593,500	13,593,500
Benefits	1,686,500	1,637,500	Benefits funded is a percentage of salaries. Saving in salaries would result in a minor saving in benefits	1,683,700	1,683,700	1,683,700
Transportation and Communications (T&C)	439,400	108,500	Reduction in travel costs as a result of virtual hearing	439,400	439,400	439,400
Services	3,727,000	3,794,800	Pressure due to cost increase of technology enhancement projects	4,828,200	4,828,000	4,828,000

Expense Category	2023-24 Budget ¹	2023-24 YE Forecast ²	Explanation of Variance	2024-25 Budget	2025-26 Budget	2026-27 Budget
Supplies and Equipment (S&E)	90,900	119,700	Minimal pressure will be offset by saving from T&C	90,900	90,900	90,900
TOTAL Operating	19,456,600	16,953,800		20,635,500	20,635,500	20,635,500
<u>Revenue</u>	1,051,000	1,100,000	Forecast adjusted as per actual and expected revenue	1,100,000	1,100,000	1,100,000

1. Treasury Board (TB) / Management Board of Cabinet (MBC) approved in-year funding of \$2.0394M in October 2022 for fiscal 2022-23 to increase staffing resources that will reduce the time to resolve disputes by facilitating earlier hearing dates and faster decision issuance. The OLT also received \$1.99M to fund additional FTEs for fiscal 2023-24 and on going. In addition, the OLT received a one time increase of \$1.40M each year for fiscal 2024-25 and in 2025-26 to upgrade their Case Management System, Website and Infrastructure Technology.
2. Forecast as of December 31, 2023.

Section 11: Performance Measures and Targets

In our previous year’s Business Plan, the Ontario Land Tribunal (OLT) noted it planned to develop new performance measures and targets to ensure its services and programs are achieving intended objectives.

The OLT has now developed two public performance measures. The first will track the time from receipt of a case until the first hearing event. For 2023-24 the goal was to reduce the time to the first hearing event to 120 days for 75% of cases. As of Q3, 70% of cases were scheduled within 120 days, and the average time for all cases was 112 days.

The targets for the next three fiscal years are as follows:

- **2024-25:** reduce the time to the first hearing event to 120 days for 85% of cases
- **2025-26:** reduce the time to the first hearing event to 100 days for 90% of cases
- **2026-27:** reduce the time to the first hearing event to 100 days for 90% of cases

The second performance measure relates to time from the end of a hearing until the issuance of a decision. For 2023-2024 the target was for 70% of decisions issued within 30 days and 90% within 60 days. As of Q3, 51% were issued within 30 days and 75% were issued within 60 days. The average time to issue a decision was 55 days.

Targets:

- **2024-25:** 80% of decisions issued within 30 days and 90% within 50 days
- **2025-26:** 90% of decisions issued within 30 days and 95% within 40 days
- **2026-27:** 90% of decisions issued within 30 days and 95% within 40 days

These performance measures are designed to assess the OLT’s core business of resolving disputes in an accessible, fair and efficient manner, including whether cases are proceeding through the system in a timely manner and resources are effectively utilized. The OLT will continue to refine and expand its performance measures in subsequent years and identify additional metrics and benchmarks as necessary.

