

## Memorandum

**To:** Employment Ontario (EO) Transfer Payment Recipients

**From:** David Cronin, Director  
Program Delivery Support Branch

**Date:** April 14, 2022

**Subject:** Wrongdoing Expectations in Ontario Transfer Payment Agreements

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A memo that was recently published about [2022-2023 Employment Ontario Transfer Payment Agreements](#) (TPAs) highlighted two changes regarding wrongdoing within the Recipient's organization and/or third parties. The changes are additions to Schedule "A", and are outlined in Schedule "B", as follows:

Addition to section A2.3:

- procedures to respond to and recover from instances of wrongdoing both within the Recipient's organization or with third parties including subcontractors, consortia members, employers, training providers, or clients, and if requested, submit a plan to address the wrongdoing to the Province.

Addition to section A12.1.a.:

- respond to allegations of fraud or wrongdoing to the satisfaction of the Province.

With the addition of these clauses in the TPA, it is the Province's expectation that all Transfer Payment Recipients (TPRs) will have a plan in place for responding to and recovering from instances of fraud or wrongdoing, in particular those that have a financial impact or cause client hardship. When a TPR becomes aware of any wrongdoing, they are expected to address it immediately and if requested, share their plan of action with the Province. Should a TPR fail to take action or respond to wrongdoing to the satisfaction of the Province, this could be considered an Event of Default and could possibly be subject to early termination.

The Province takes management of public funds seriously and has put these measures in

place to ensure accountability and due diligence. Thank you for your support in managing any wrongdoing that may arise during the course of your TPA(s).

If you have any questions regarding the contents of this memo, please contact your ministry representative.

Thank you,

David Cronin  
Director

cc: Charles Bongomin, Central Region – A/Regional Director  
Heather Cross, Western Region – Regional Director  
Andrew Irvine, Northern Region – Regional Director  
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