

Options

# Toronto's Voters' List

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## Executive Summary

One of the key elements providing legitimacy to an election is an accurate, current and reliable voters' list.

While concerns about the accuracy of Ontario municipal voters' lists have been expressed for several elections, the 2006 election presented Clerks across the province with a unique and demanding problem.

The Municipal Property Assessment Corporation (MPAC), the organization who under the *Municipal Elections Act, 1996* (the *MEA*) is responsible for providing the preliminary lists of electors to Ontario's municipalities, included the names of individuals whose eligibility to vote had not been confirmed on the lists they sent to Clerks across the province.

On July 19, 2006, the City Clerk received an electronic copy of Toronto's preliminary list of electors (PLE) from MPAC. There were 276,682 individuals on the PLE identified by MPAC as unconfirmed Canadian citizens or whose age was not known.

Notwithstanding the fact it is MPAC, not the Clerk, who has the legislative responsibility to provide a preliminary list of eligible electors, the Clerk decided it was incumbent upon her to proactively address this issue to preserve the integrity of the election.

Accordingly, the City Clerk implemented a comprehensive "Unconfirmed Voter Strategy" to attempt to confirm the elector qualifications of the individuals identified as "unknown".

The issue attracted much media attention and was a source of concern for candidates, especially given its impact on their campaign spending limits.

To fully understand the implications of the "unconfirmed" individuals on the PLE, see the City Clerk's 2006 Returning Officer's Report.

As a result of the unconfirmed elector issue, at its July 25, 26 and 27, 2006 meeting, Toronto City Council recommended that "in view of the continuing issues surrounding [the Municipal Property Assessment Corporation's (MPAC's)] ability to prepare an accurate voters' list, the City Clerk be instructed to report to the next term of Council on other options that City Council could consider for the compilation and preparation of the City's voters' list."

This paper briefly looks at the history of municipal voters' lists in Ontario and the current legislative framework, examines the issues that are present in any method of compiling electoral information, identifies the factors that need to be considered in weighing the options presented and analyzes the options potentially available for the preparation of Toronto's municipal voters' lists. The options examined are:

- an "active" partnership with MPAC;
- a voter registration system;
- conducting an enumeration;
- obtaining a voters' list from another source (e.g. Elections Canada or Elections Ontario); and
- conducting the election with no voters' list. Any desire on the part of Toronto City Council to alter the manner in which voters' lists are

prepared for the City's elections will require the Ontario Legislature to enact amending legislation.

This paper takes a narrow scope when discussing alternative options for the compilation and preparation of the City's voters' list. It assumes that the *Municipal Elections Act, 1996* is in effect in its current form. It assumes that the elector eligibility requirements have not changed.

If either of these two basic assumptions change, then the analysis, options and recommendations listed in the paper will also change.

Although the voters' list impacts many aspects of the administration of the election, the peripheral issues that are impacted by the voters' list are out of scope for this paper. This paper does not discuss:

- compliance and enforcement mechanisms for the *MEA*;
- campaign expense limits;
- elector identification requirements;
- methods to increase voter turnout;
- mandatory voting; and
- voting place procedures.

Traditionally in Canada, the government has assumed responsibility for the collection of electoral data and the preparation of voters' lists. This is in contrast with the practice in other parts of the world, such as the United States, which places the onus on the elector to take the necessary action to ensure their name is included on the voters' list.

In elections at all levels in Ontario, there has been a slight shift in onus that requires electors to play an increasing role in ensuring that they are included on the voters' lists

used on voting day. The establishment of Elections Canada's and Elections Ontario's permanent registers and the elimination of door-to-door enumeration are evidence of this fact. This shift is balanced by an obligation on election officials to ensure that electors have ready access to processes that offer them every opportunity to get on the voters' list.

This paper recommends that in future elections the City Clerk use Elections Ontario's Permanent Register of Electors, supplemented by information from any source that, in the opinion of the Clerk, is relevant, as the basis for the voters' list. This approach would allow the Clerk the flexibility to use data from any source to ensure the voters' list is as accurate as possible heading into an election period.

This option would be easy to implement, is cost-effective, supports the principles of democratic elections and continues the Canadian tradition that the government is responsible for collecting electoral information.

The option also provides the added benefit of obtaining information from a dedicated election resource. MPAC's primary focus is property assessment and the preparation of municipal voters' lists is a very small component of its business. As such, MPAC makes decisions about who to include in their database based on their property assessment status, not elector qualification. In contrast, Elections Ontario's primary business is elections and as such, their permanent register is compiled for the sole purpose of determining elector eligibility. By using Elections Ontario's permanent register, the City would be following the practice that is used in the vast majority of Canada's

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provinces and territories by obtaining elector information from an organization's whose sole focus is elections.

However, since Elections Ontario's Permanent Register of Electors is also updated with information from both Elections Canada and MPAC through a tripartite agreement, this option also benefits from the data collection activities of these other agencies.

## 1.0 Background

### 1.1 History

Historically, in addition to age, citizenship and residency qualifications, an individual needed to own property in order to be able to vote in Ontario's municipal elections.

Given this relationship to property value, Ontario municipal voters' lists were prepared using information contained in the property assessment database. Accordingly, the Municipal Property Assessment Corporation is the agency responsible for compiling Ontario's municipal voters' lists under the *Municipal Elections Act, 1996*. This manner of preparation makes Ontario municipal voters' lists unique when compared to other Canadian jurisdictions.<sup>1</sup>

On a daily on-going basis, the property assessment agency collects updated information, e.g. new property ownerships and updated occupant information through property assessment visits.

In addition, throughout the years, the agency responsible for property assessment conducted an enumeration to gather the information required for the preparation of lists of electors.<sup>2</sup>

Until 1980, enumeration was an annual event, after that, it moved to a three-year event (now a four-year event) in conjunction with a municipal election.

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<sup>1</sup> See Appendix A for a description of how other provinces prepare their municipal voters' lists.

<sup>2</sup> See Appendix B for a detailed description of the history of municipal voters' lists in Ontario.

Up to the 1985 election, the municipal enumeration was a door-to-door process that took place in early September of an election year. However, from 1988 to 1998, the municipal enumeration was conducted by mail, with a Municipal Enumeration Form being mailed to every household identified in the property assessment database.

Given the increasing costs and associated issues of conducting a full enumeration and in recognition of the need to improve the quality of enumeration data, in 1999 the property assessment staff began to investigate new data sources and data quality improvement opportunities. The creation of the National Register of Electors (NRE) following the 1997 federal election provided the opportunity for a comparison of the quality of the municipal electoral information with that contained in the Elections Canada database.

Beginning in 2000, municipal enumerations were targeted, with Municipal Enumeration Forms only being mailed to those households that could not be matched with the NRE.

It is important to note that MPAC's primary business activity is property assessment and that the generation of preliminary list of electors is a small component of its workload. MPAC's database operates on business rules designed to fulfill its core responsibility for property assessment valuation, not the collection of elector information. For example, MPAC cannot add "new property owners" based solely upon an application to amend the voters' list that the Clerk may receive during an election. It must receive property ownership changes from the Land Registry Offices.

## 1.2 *Legislative Framework for the City's Voters' List*

Municipal elections in Ontario are conducted under the authority of the *Municipal Elections Act, 1996*, S.O. 1996, c. 32. In order to protect the integrity of the municipal electoral process, the provincial government, through the *MEA*, places the responsibility for administering the election upon the City Clerk.

Table 1 outlines the Municipal Property Assessment Corporation's responsibilities for collecting elector eligibility information and creating the preliminary list of electors (PLE). It also explains the role of the City Clerk in receiving the information and correcting the PLE for obvious errors.

An elector is eligible to vote in the City of Toronto municipal election if they are:

- a Canadian citizen;
- at least 18 years old; and,
- a resident of the City of Toronto; or
- a non-resident owner or tenant of land in the City of Toronto, or their spouse; and
- not prohibited from voting under any law.

**Table 1 – Current Legislative Framework for the Preparation of the Voters' List**

<i>MEA</i>	City Clerk's Provisions
Section 12	The Clerk has the power to establish policies and procedures for any matter not provided for by any legislation or regulation that is necessary or desirable for the conduct of the election.
Section 18	The Clerk has the ability to divide the City into voting subdivisions for the purpose of conducting the election.
Section 19	MPAC is required to deliver a preliminary list of electors to the City Clerk on or before July 31 <sup>st</sup> in an election year, broken down into wards and voting subdivisions.  The PLE is to contain the names and addresses of eligible electors and any additional information that the Clerk needs to determine the offices for which an elector may vote.
Section 22	The Clerk needs to correct any obvious errors in the PLE, (e.g. checking the PLE for missed streets, multi-residential buildings and voting subdivisions).
Section 23	Once corrected by the Clerk, the PLE becomes the voters' list. The Clerk is required to print and post the voters' list for public inspection.
Section 24	The Clerk is required to accept applications from eligible electors or their agents during the period from the day after Labour Day to the close of voting on voting day (September 5 to November 13, 2006) to amend the voters' list.
Section 25	Up to nomination day (September 29, 2006), the Clerk can delete names following a hearing to consider the application for removal of another elector's name.
Section 27	The Clerk is required to provide MPAC with the revisions made to the voters' list for database updating.

## 2.0 Toronto's 2006 Municipal Voters' List

Across the Province, Clerks' offices faced unique and demanding challenges during the preparation of the 2006 municipal voters' list. Historically, under initial direction from the Ministry of Finance, the agency responsible for property assessment had assumed, if no confirming information was received, that all new individuals added to its database were Canadian citizens, at least 18 years of age and public school board supporters.

Over the years, Clerks of large urban municipalities with high immigrant populations became increasingly concerned with this assumption. Clerks called upon MPAC to resolve this issue to preserve the integrity of municipal elections and ensure that only the names of qualified electors appeared on preliminary lists of electors.

In response to Clerks' concerns, MPAC undertook a data matching exercise with Elections Canada's National Register of Electors in early 2006 to verify the eligibility qualifications of individuals in its database. For the first time, any individual in MPAC's database whose citizenship and/or age could not be confirmed with the National Register was coded as a "U" for "unconfirmed citizen".

Province-wide, this resulted in an average of 10.95 percent of individuals on the preliminary list of electors being identified as a "U". In Toronto's case, the percentage was significantly higher at 16.3 percent (276,682 individuals). Toronto's larger number is not surprising, given the large number of tenants living in the City and the decreased probability for tenants to return Municipal Enumeration Forms to MPAC (22 percent versus 50 percent for homeowners).

The "unconfirmed citizen" designation was problematic as the Clerk is required by law to use MPAC's preliminary list of electors as the foundation for the municipal voters' list. In past elections, whenever the accuracy of the list was questioned, the Clerk could point to subsection 19(4) of the *MEA* and say that MPAC had provided a listing of "eligible" electors.

In 2006, the Clerk now had information that 276,682 individuals on the list may, in fact, not be eligible electors. Notwithstanding the fact it is MPAC, not the Clerk, who has the legislative responsibility to provide a listing of eligible electors, the Clerk decided it was incumbent upon her to proactively address this issue to preserve the integrity of the election.

Accordingly, the City Clerk implemented a comprehensive "Unconfirmed Voter Strategy" to attempt to confirm the elector qualifications of the 276,682 individuals identified by MPAC as unconfirmed citizens or whose age was not known. The strategy included:

- on August 2, 2006 the City Clerk sent a letter to:
  - each person whose elector qualifications could not be confirmed requesting they complete a declaration and confirm their eligibility by September 8, 2006;
  - every candidate to advise them of the situation and suggest they exercise caution in any preliminary estimates of their campaign spending limits (which is based upon the number of



- electors on the voters' list as of nomination day);
- on August 2, 2006 the City Clerk established a call centre to receive calls from the public who may have questions about their letters or the initiative;
- throughout August 2006, the City Clerk's Office undertook an extensive communication campaign which included:
  - advertisements in major daily newspapers and ethnic and community newspapers advising the City's residents of the situation;
  - information on the confirmation initiative was posted on the City's website in the seventeen languages approved by Council for election purposes;
  - outreach to community and cultural groups to disseminate information on the confirmation initiative to their members;
  - outreach to news organizations to ensure that all eligible electors were aware of their rights and responsibilities regarding the 2006 municipal election; and
  - in September 2006, the City Clerk undertook an expanded

elector revision process with copies of the voters' lists being made available for public inspection at 24 locations across the City – 5 City Clerk's offices and 19 libraries.

In order to complete the "Unconfirmed Voter Strategy", the City Clerk's Office and Corporate IT had to first develop a computer application that would separate the unconfirmed individuals from the PLE and load them into a separate database that would be accessed by the U-Citizen application.

In the U-Citizen application, users were able to perform searches for individuals by last name, first name, address and postal code. When a record was found, the user was able to change the eligibility status or update the birth date so that the individual could be merged back into the voters' list database.

The U-Citizen computer application was created in the span of three weeks and is an example of the high level of service that the Corporate IT staff provide to the City's election.

*Table 2: Outreach Initiatives*

Letters to Affected Individuals	276,682
Letters to Candidates	514 letters (2 mailings)
Number of Community Groups / Cultural Organizations Worked With	13
Total Number of Newspaper Advertisements	34
Number of Ethnic Newspaper Advertisements	24
Locations for Viewing the Voters' List	24

*Table 3: Overall Response to the Unconfirmed Voter Strategy*

Number of Letters to Affected Individuals	276,682
Number of Completed Letters Returned	30,170
Number of Letters Returned as "Undeliverable"	40,357
Number of Calls Received	3,323
Number of Website hits	1,159

Unfortunately, when adjusted for the "non-deliverable" mail, the response rate of the campaign was only 13 percent.<sup>3</sup> As a result of the outreach campaign, the City Clerk was able to confirm the elector qualifications of only 30,170 of the "U"-identified individuals.

In addition, 856 "other" responses were received indicating the individual was: not a Canadian citizen (422) not yet 18 years of age (32), deceased (148) or had moved out of the City (254). These names were removed from the City's voters' list.

In addition, the names of those who did not respond to the Clerk's letter were removed from the list. Various communication pieces continued throughout the fall to advise eligible electors of the ability to have their names added to the voters' list when they went to vote.

Given the limited response to the outreach initiative, the City Clerk was concerned that there would be a significant increase in the number of qualified electors needing to add their names to the list on Election Day.

Accordingly, staff developed specific strategies to deal with any issues that may

have arisen on Election Day to ensure that qualified electors whose names were not on the voters' list could be added to the list as quickly and efficiently as possible.

As illustrated in Table 4, the voters' list impacts many election administration components. As such, staff re-examined voting place staffing, supply levels and the voting place infrastructure (e.g. number of parking spaces, room occupancy limits) to ensure it could accommodate a large influx of individuals needing to be added to the list.

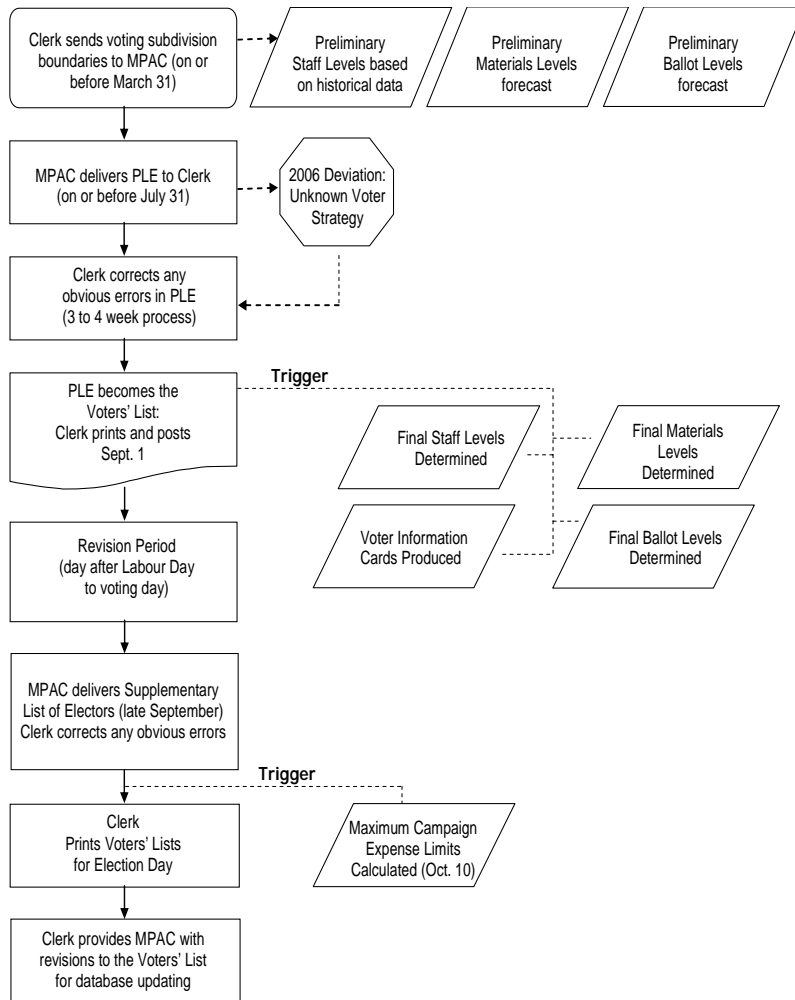
However, as Table 5 indicates, there were actually fewer additions and corrections to the 2006 voters' list as compared to the 2003 list. Initial fears that large numbers of electors would need to add their names to the list on Election Day never materialized.

The percentage of electors who needed to add their names at the voting places only increased by 1.11 percent over the 2003 election. This increase could be explained, in part, by the population growth between the 2003 and 2006 elections. (Between the 2001 and 2006 Censuses, Toronto's population grew by 21,787 residents, an increase of 0.9 percent.<sup>4</sup>)

<sup>3</sup> As of November 14, 2006. The City Clerk's Office continues to receive responses to the letter and undeliverable mail. These letters are sent to MPAC so that its database can be updated.

<sup>4</sup> Statistics Canada, 2006 Census

*Table 4: Election Components Impacted by Voters' List*



*Table 5: Comparison of Revisions – 2003 and 2006 Elections*

	2003 Election	2006 Election
No. of Electors on Voters' List Prior to the Start of Voting	1,740,889	1,442,500
No. of Additions at Voting Places (includes advance vote)	84,250	78,621
No. of Amendments at Voting Places (includes advance vote)	11,751	14,299
Total No. of Changes at Voting Places (additions & amendments)	96,001	92,920
Final Number of Electors on Voters' List	1,825,139	1,521,121
Number Who Voted	699,492	597,754
% of Voters who were Added at Voting Places	12.04%	13.15%
% of Voters who Amended their Information at Voting Places	1.68%	2.39%

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Unfortunately, the “Unconfirmed Voter Strategy” had to be executed at a time when the City Clerk’s staff resources were already overburdened with implementing other aspects of the election calendar. As discussed in the 2006 Returning Officer’s Report, the “Unconfirmed Voter Strategy” created a significant risk to other areas of the election since it consumed so much of the senior management team’s time.

As well, Corporate IT staff needed to be quickly re-assigned to the development of the U-Citizen application, impacting the technology resources available to support other corporate priorities.

The City Clerk’s Office simply does not have the staff or the financial resources to undertake this project during every municipal election cycle since the voters’ list impacts so many aspects of the administrative process (see Table 4).

The issue attracted much media attention and was a major source of concern for candidates, especially given its impact on the campaign spending limits. As a result of the unconfirmed citizen issue, Toronto City Council directed the City Clerk to investigate and report on other options that could be considered for the preparation of the City’s voters’ lists.

### 3.0 Voters' List Operational Issues

This section of the paper will examine the operational issues that impact the accuracy and completeness of the voters' list data. The issues are:

- Voluntary nature of data collection;
- Duplicate entries;
- Currency of data;
- Enumeration difficulties;
- Data entry errors;
- Access to birth and death information; and,
- Protection of personal privacy.

These issues will be present to some degree in any method of compiling voters' list information. Changing the data source does not guarantee an accurate list.

In addition, the large concentration of rental accommodation in the City, combined with a highly mobile and culturally diverse population, contributes to the traditional difficulties in identifying electors.

#### 3.1 *Voluntary Nature of Data Collection*

In Canada, there is no legal requirement to ensure that one's name has been properly recorded as an eligible elector. Responses to any data collection activities for electoral information in Canada are submitted strictly on a voluntary basis; there are no penalties if an individual chooses not to respond.

In the absence of any penalties, attempts to collect electoral information will always be subject to the respondents' willingness to complete and return the forms.

Canadian electoral agencies generally experience a low response rate to their requests for information. This trend is evident at all three government levels. For example, the provincial response rate to MPAC's 2006 Municipal Enumeration Forms was 40.49 percent (22.49 percent for the City of Toronto) and 40 percent to its 2006 Occupancy Questionnaires<sup>5</sup>.

In 2005 Elections Canada had a 20.3 percent response to its request for citizenship confirmation from individuals who had checked the box on their income tax form, consenting to the sharing of their data with Elections Canada or were new 18-year olds identified from driver's licence records.<sup>6</sup>

After adjusting for "undeliverable" mail, Toronto's City Clerk had a 13 percent response rate to a request sent to the 276,682 "unconfirmed citizens" for confirmation of citizenship or age during the 2006 election.

As Table 6 indicates, the province-wide response rate to MPAC's Municipal Enumeration Form decreased significantly between the 1988 and 2006 mailings.<sup>7</sup> While no studies have been conducted to investigate why this decrease occurred, the elimination of any follow-up with non-respondents in the year 2000 may be a contributing factor.

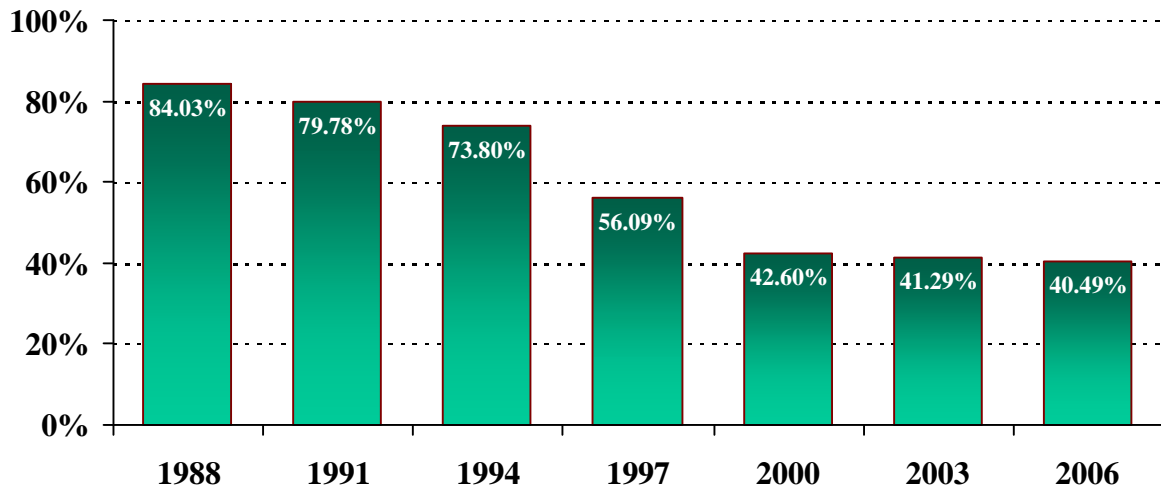
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<sup>5</sup> Statistics provided by Municipal Property Assessment Corporation staff

<sup>6</sup> Report of the Chief Electoral Officer of Canada on the 39<sup>th</sup> General Election of January 23, 2006, p. 17

<sup>7</sup> Statistics provided by Municipal Property Assessment Corporation staff

Table 6: Province-Wide Municipal Enumeration Response Rate



When an individual chooses not to respond, the electoral agency cannot obtain the additional information (including citizenship, age, residency, school support) required to confirm whether or not he or she is qualified to be an elector. The agency must then decide whether to do additional follow-up, exclude the individual from the voters' list or leave the name on the list with a notation to obtain confirmation of eligibility at the voting place if the individual goes to vote.

All of these choices have implications on the accessibility and integrity of the election.

Additional follow-up is costly, with no guarantee of success. Excluding the individual will create difficulties for him or her to vote – they will not receive a voter information card telling them where and when to vote and they will have to add their name to the list when they go to vote.

Leaving the name on the list increases the risk that ineligible individuals may vote,

thereby calling the integrity of the election into question.

### 3.2 Duplicate Entries of the Same Elector

To provide certainty that an elector is only able to vote once in an election, their name should only appear once on a voters' list. However, multiple property ownership, elector mobility, and duplicate entries of electoral information create difficulties in achieving this goal.

Prior to the amalgamation of the City of Toronto in January 1998, if an elector owned or rented property in more than one of the former municipalities that now make up the City, he or she was legally entitled to vote once in each municipality where he or she owned or rented property. Once amalgamation occurred, that same elector was now legally restricted to only one vote in the City even though his or her name may appear more than once on the City's voters' list.

Unfortunately, it was a difficult, if not impossible task, for MPAC to take the six separate voters' lists, one from each of the former municipalities, and compare the data to eliminate all duplicate and multiple entries. This task was further complicated by the absence of elector specific data for some of the records, such as a birth date, which could have verified the entries as being the same individual.<sup>8</sup>

As discussed in Section 3.3, 13 percent of electors move in any given year. This high mobility rate increases the probability that an elector's name may appear more than once on the PLE, once at the "old" address and once at the "new" address, if the elector does not take any action to update MPAC's database.

A decision must be made whether the existing name or names should be retained or deleted. As decisions of this magnitude, i.e. the possible disenfranchisement of an elector, should not be made arbitrarily, most list administrators will add the new name and retain the existing records and attempt to obtain clarification of exactly who is living in the household.

In general, the sharing of information between agencies, while beneficial for the confirmation process, can unfortunately lead to duplicate entries. The parties may each have a slightly different version of the elector's name, leading them to conclude they are different individuals during the matching exercise.

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<sup>8</sup> For example, there were 25 "John Smith" entries on the City's 2006 voters' list, some of which did not have a complete birth date.

City Clerk's Office staff, as part of the correction process of the 2006 PLE, deleted 1,639 duplicate or multiple records on the PLE that were an exact match on first name, last name, qualifying address and birth date.

### 3.3 *Currency of the Data*

In order to allow for sufficient time to update the data and produce a voters' list, any data collection activity must start well in advance of the election date. Based on its experience, Elections Canada estimates that approximately 17 percent of the electoral information in the National Register of Electors will change in any given year – 13 percent will move, 2 percent will turn 18, 1 percent will become new Canadian citizens and 1 percent will die<sup>9</sup>.

The *Municipal Elections Act, 1996* outlines a specific timetable that both MPAC and the City Clerk must follow. MPAC starts its mail enumeration process in early April. The PLE is delivered at the end of July, four months later. The revision period for electors starts one month later, at the beginning of September.

The preparatory process continues for a further two months until voting day in the second week of November. In a City of 1.5 million electors, it is reasonable to expect that in excess of 110,000 will move over the seven months between the start of MPAC's enumeration process and voting day. This holds especially true for families who are more likely to move during the summer months to avoid disruption during a school year.

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<sup>9</sup> Elections Canada: Registration of Electors: Description of the National Register of Electors, February 2005

For the 2003 election (2006 figures not yet available), MPAC advised that 10.3 percent of the electoral information on the City's voters' list changed between the delivery of the July PLE and the September Supplementary PLE. To improve data currency, MPAC has suggested that the date for delivery of the PLE to municipal clerks should be moved forward to the end of August or the beginning of September.

This proposed date shift would not work for the City of Toronto. There are 1.5 million electors on the City's PLE and if the City Clerk received the PLE later in the election process there would be insufficient time to correct the PLE for "obvious errors", have the list printed and available for revisions and distributed to candidates for campaigning purposes. (As previously indicated, it takes City Clerk's staff anywhere from 3 to 4 weeks just to check and correct the PLE.)

Any of the options for preparation of the City's voters' lists, other than the "no list" option, will have data currency issues. A balance needs to be struck between preparing the most accurate list and the recognition that some eligible electors will move during that time period.

### 3.4 *Enumeration Difficulties*

Traditionally, an in-person door-to-door enumeration was seen as the best way of identifying electors. The process was viewed as timely, taking place just before the election and was believed to be accurate, since the information came directly from the elector. However, recent history has shown that a door-to-door enumeration, especially in an urban area with a multi-lingual population, is not a cost-effective vehicle to capture potential electors.

In 1988, the provincial Ministry of Revenue replaced its door-to-door approach to municipal enumeration with an enumeration-by-mail system. There were several justifications for abandoning the traditional enumeration. The most significant reasons included:

- the cost of enumeration;
- the difficulty in finding people willing to be enumerators;
- issues with the safety of enumerators in some buildings and geographic areas;
- difficulty in getting a response at the door;
- difficulty in getting access to some secure buildings and gated communities;
- language difficulties; and
- some people unwilling to provide information to "government".

Since 1988, the experience of the Ministry of Revenue has been repeated at elections in most other jurisdictions. For essentially the same reasons, voters are no longer identified through a "full" enumeration for federal elections and for provincial elections in Alberta, British Columbia, New Brunswick, Newfoundland and Labrador, Nova Scotia, Ontario, Prince Edward Island and Quebec.

In all of these jurisdictions some form of permanent register is now used as the basis for the voters' list. At the provincial level, register updates can be made by conducting an enumeration, target revision or "confirmation" canvassing (which may take place outside the election calendar) or through data-sharing agreements with other jurisdictions. At the federal level, only target enumerations are undertaken in conjunction with data-sharing agreements.



The ability of an enumeration to capture accurate and current data will vary. For example, an enumeration in a stable, rural community would yield a higher percentage of accurate and current data on Election Day than would an enumeration in a mobile, multi-lingual, urban centre. In smaller communities, the electors may be more likely to personally know the enumerator and therefore more willing to open the door and provide the requested information. In this regard, it is perhaps interesting to note the characteristics of the Canadian jurisdictions that continue to compile their provincial voters' lists solely from an enumeration – Manitoba, Saskatchewan, Yukon and Nunavut.

To be of value an enumeration would have to take place as close as possible to the election. In addition, it would be preferable to avoid conducting an enumeration over the summer months when residents may be away on vacation. This would mean that for a November municipal election day, any enumeration should be conducted either in June or early September. However, the closer the enumeration is to voting day, the greater is the difficulty of integrating the enumeration data into a database and compiling the voters' lists for timely distribution to candidates and for use in the voting places.

The primary reason that election agencies have moved away from a door-to-door enumeration is cost. It is estimated it would cost \$85 million to conduct a federal enumeration.<sup>10</sup> Elections Canada estimates cumulative cost savings of over \$150 million

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<sup>10</sup> Improving the Integrity of the Electoral Process: Recommendations for Legislative Change, Report of the Standing Committee on Procedure and House Affairs, June 2006, p. 31

at the federal, provincial and municipal levels attributable to the establishment of the National Register of Electors.<sup>11</sup>

MPAC estimated that it would cost approximately \$24 million (2003 dollars) to conduct a door-to-door enumeration of the province's 4.5 million households. Their current targeted single mail-out costs approximately \$4 million.<sup>12</sup>

The statistics from Elections Canada and MPAC, can be extrapolated to provide a very rough estimate as to how much an enumeration would cost for the City of Toronto. Breaking these costs down into a per household amount and adjusting for inflation at an annual rate of 2.16 percent<sup>13</sup>, for the City of Toronto's 979,330 households, the rough estimated cost for conducting a door-to-door enumeration for the 2010 election would be approximately \$6.04 million. The actual costs could be much more or less than the estimate depending on the start-up and administrative costs.

### 3.5 *Data Entry Errors*

Whenever information is manually entered into a database, some errors will occur. For example, the City's 2006 preliminary list of electors received from MPAC had birth years dating back to 1013, obviously a data entry error.

Unfortunately, the existence of data entry errors may lead some to question the

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<sup>11</sup> Report of the Chief Electoral Officer of Canada on the 39<sup>th</sup> General Election of January 23, 2006, p. 19

<sup>12</sup> MPAC staff presentation to the Municipal Liaison Group - Elections, April 14, 2005

<sup>13</sup> 2.16 percent was the average annual rate of inflation for the years 2003 to 2007 according to the Bank of Canada's Inflation Calculator

integrity of the data collection process and the quality of the remainder of the data in the database.

Any data management system must contain detailed quality control checks to ensure the majority of keying errors are detected and corrected. While it would be impracticable and cost-prohibitive for all entries to be checked, acceptable standards need to be developed to protect the integrity of the data. These processes will increase the cost of establishing and maintaining a database.

### 3.6 *Access to Birth & Death Information*

One of the historic problems faced by MPAC has been ready access to birth and death information to update its database. The lack of information on births and deaths means that MPAC cannot include new 18-year olds on the preliminary list of electors nor exclude those who have died.

Due to privacy concerns, Ontario's Registrar General has refused to provide such information to MPAC. Recent amendments<sup>14</sup> to the *Vital Statistics Act* would permit an institution to apply to the Registrar General to obtain death information. However, the Registrar General has yet to determine how much information it is willing to release to MPAC.

Any system of compiling voters' list information must have ongoing access to complete birth and death information. Without birth information, new 18-year olds are not captured on a voters' list. Not having access to information on deceased electors

may increase the risk of illegal activity occurring and causes emotional distress for the surviving family who receives a voter card for their deceased loved-one.

### 3.7 *Protection of Personal Privacy*

Fears of the potential for identity theft may lead some to avoid having their confidential information captured on a public list due to concerns over the organization's ability to keep their information in a secure environment. Recent major security breaches involving financial institutions and commercial enterprises may serve to further erode the public's confidence.

An elector's birth date is a key piece of information needed to identify possible duplicate entries. However, this is the type of personal information that some individuals may be reluctant to provide.

While detailed statistics were not kept, City elections staff did note an increase in the number of calls during the 2006 election asking for removal of their name from the voters' list and inquiring "how did you get my name?"

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<sup>14</sup> *Budget Measures Act, 2006*, Schedule P, S.O. 2006, c. 9

## 4.0 Options

This section of the report will outline the potential models that could be used to compile a voters' list for the City of Toronto. Given the concerns that historically have been raised with the City's voters' lists, most recently the 2006 "unconfirmed citizens", the continuation of the status quo is not considered a viable option.

The models considered in this paper are:

- an "active" partnership with MPAC;
- a voter registration system;
- conducting an enumeration;
- obtaining a voters' list from another source (e.g. Elections Canada or Elections Ontario); and
- conducting the election with no voters' list.

### 4.1 *Active Partnership with MPAC*

Under this model, the City Clerk's Office would form an "active" partnership with MPAC to work collaboratively to produce the City's voters' list. MPAC would periodically provide a listing of electors from its database to the City. Staff would review the data for such anomalies as duplicate or multiple entries, missing or incomplete birth date information and data entry errors. The City Clerk would work in co-operation with MPAC to attempt to resolve these issues and collect the information necessary to determine electoral eligibility.

In addition, the City Clerk's Office would conduct an intensive voter outreach initiative using newspaper advertisements, websites and other communication mechanisms to encourage eligible electors to contact MPAC

to update their information. Information pamphlets and MPAC's Occupancy Questionnaires could be made available at all City service counters and posted on the City's website.

### 4.2 *Voter Registration (voter initiated)*

This model is based on a full voter registration system, similar to that used in the United States. The onus would be placed on the elector to take the necessary action to be included in the register. The register would be permanent and ongoing, open to applications at any point in time.

To register to vote, eligible electors would need to complete an application form, including a declaration of qualifications.

The register could start with an uploading of either the federal or provincial voters' lists or with MPAC's preliminary list of electors. The register would then operate on a "go-forward basis" and staff would work to correct any data errors in the provided list. Under this scenario, electors whose names have appeared on prior voters' lists in the City, whether federal, provincial or municipal, would automatically be included.

Additional staff would be required to implement a registration process. The City of Chicago has a similar number of electors (1.4 million) when compared to Toronto and they employ 100 full time staff to manage their voter registration program.

#### 4.3 *Toronto Conducting an Enumeration for Each Election (government initiated)*

An enumeration is a door-to-door survey of all households within a jurisdiction to collect information for the preparation of a voters' list.

Under the enumeration model, a team of enumerators would need to be hired and trained. Based on the Province of Alberta's 2004 enumeration experience, the City Clerk would need to manage a team of at least 5,400 enumerators.

The enumerators would be responsible for visiting every household in the City and ensuring that the enumeration forms are completed correctly.

#### 4.4 *Obtain a Voters' List from Elections Canada or Elections Ontario*

Elections Canada has maintained the National Register of Electors (NRE) since 1997. The NRE was implemented to provide an accurate list of electors, eliminate the problems associated with an enumeration, provide for fiscal savings and allow for a shortened federal election calendar.

An integral component of the NRE is the ability for government agencies to share information, thereby increasing the accuracy, currency and completeness of the NRE data. Over the years Elections Canada has expanded its data-sharing agreements with federal and provincial government departments to capture information on eligible electors. Probably the most significant data sharing source is the Canada

Revenue Agency, which allows income tax filers to easily give consent for the sharing of their information with Elections Canada. Approximately 84 percent of tax filers consent to the transfer of their information to the NRE.<sup>15</sup>

Another recent initiative, the tripartite agreement with Elections Ontario and MPAC, allows the partners to share data to work towards a "single list of electors" for the Province of Ontario.

The City of Winnipeg, the first municipality to sign an agreement with Elections Canada, has used the NRE as the basis of its voters' list since 1998. Winnipeg supplements the NRE data with information from its municipal assessment roll, tax and water billings and provincial vital statistics data.

The City Clerk and the Director of Elections and Registry Services met with Jean-Pierre Kingsley, the former Chief Electoral Officer, in January 2007. At that time, Mr. Kingsley indicated his support for providing the Clerk with an extract from the NRE for the City's elections.

Elections Ontario also maintains a permanent voters' list in the form of the Permanent Register of Electors for Ontario (PREO). The Chief Election Officer has already indicated his willingness to share PREO with any municipal clerk for the conduct of their elections. Elections Ontario, as a member of the tripartite agreement, shares data with both Elections Canada and MPAC.

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<sup>15</sup> Completing the Cycle of Electoral Reforms: Recommendations from the Chief Electoral Officer of Canada on the 38<sup>th</sup> General Election, 2005, p. 47

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By obtaining the basis of the municipal voters' list from either Elections Canada or Elections Ontario, the City would be relying on information from a dedicated election resource. As such, the business decisions about who to include in Elections Canada and Elections Ontario databases are based solely on elector eligibility.

#### 4.5 *No Voters' List*

The no voters' list model is used for municipal elections in Alberta and Saskatchewan.

All electors arriving at a voting place are required to provide identification and complete a declaration of elector qualifications. The declaration includes their name and qualifying address and confirmation of school support.

Preliminary comparisons with the City of Edmonton's voting place staffing levels indicate that minimal additional voting place staff would be needed to implement this option.

A comprehensive media campaign would be undertaken to advise the City's electors of the revised voting process. The declaration of elector qualifications form would be available for downloading from the City's website and a sample would be included in the election tabloid, delivered to every household in the City.

## 5.0 Analysis

There are a number of considerations that need to be analyzed when determining an appropriate model for the preparation of Toronto's voters' list.

The models considered in this paper are:

- an "active" partnership with MPAC;
- a voter registration system;
- conducting an enumeration;
- obtaining a voters' list from another source (e.g. Elections Canada or Elections Ontario); and
- conducting the election with no voters' list.

Any system of collecting and maintaining elector information must meet the needs of the electors and the government body, be accessible, understandable, affordable, easy to implement and preserve the integrity of the election.

In determining which option best suits the City's needs, each of the models will be analyzed using the following factors:

- Government or Voter Initiated List
- Legislative Authority
- Ease of Implementation
- Costs
- Advantages and Disadvantages

A chart at the end of this section compares how the proposed models perform against each of the factors.

### 5.1 *Government or Voter Initiated Lists*

Traditionally in Canada, the government has assumed responsibility for the collection of electoral data and the preparation of voters' lists. This is in contrast with the practice in other parts of the world, such as the United States, which places the onus on the elector to take the necessary action to ensure their name is included on the voters' list.

In elections at all levels in Ontario, there has been a slight shift in onus that requires electors to play an increasing role in ensuring that they are included on the voters' lists used on voting day. The establishment of Elections Canada's and Elections Ontario's permanent registers and the elimination of door-to-door enumeration are evidence of this fact. This is balanced by an obligation on election officials to ensure that electors have ready access to processes that offer them every opportunity to get on the voters' list.

In Ontario, electors failing to take action prior to election day can always have their names added to the voters' list at the voting place on voting day, thereby ensuring that no elector is ever disenfranchised.

When considering which model would be appropriate for Toronto, each of the options will be evaluated for whether responsibility for obtaining information for the voters' list is placed on the state or on the elector.

### 5.2 *Legislative Authority*

The manner in which municipal voters' lists are prepared in Ontario is mandated by the Legislative Assembly through legislation

such as the *Municipal Elections Act, 1996* and the *Assessment Act*.

Should Toronto City Council wish to implement an alternative model, it does not have the legal authority to do so. Council can only request the provincial government to enact amending legislation to permit the preferred model.

The willingness of the Legislature to consider a request for amending legislation from the City, especially a request that may result in a Toronto-specific option, is unknown. However, in this regard, a precedent has already been set with the enactment of the *City of Toronto Act, 2006*. Any Toronto-specific provisions could easily be incorporated into that *Act*.

If the Legislature agrees to Toronto's request, any amendments would need to be passed before September 2009 to permit the City Clerk the necessary time to properly implement any new system. Failure to do so could seriously jeopardize the City Clerk's ability to prepare an accurate voters' list.

### 5.3 *Ease of Implementation*

There will be operational issues that need to be addressed with the adoption of any new method of preparing the City's voters' lists.

Some methods can be implemented more easily than others; for example, moving to a "no list" model could be quickly implemented; a voter registration system would require many months of implementation.

Some of the proposed options would require additional staff resources to implement, most notably voter registration or conducting a door-to-door enumeration. These are both

very labour-intensive systems and would necessitate the hiring of additional staff; both permanent and temporary. For example, the City of Chicago with 1.4 million electors has 100 full-time staff dedicated to its voter registration program.<sup>16</sup>

Any change would also have an impact on the City Clerk's current infrastructure, including the technology currently employed.

Each model must also be analyzed to see whether or not it is able to collect all of the information required to determine an elector's qualification.

Municipally, an elector is eligible to vote in any municipality where he or she owns or rents property, subject to certain restrictions (e.g. may only vote once within each municipality or area of school board jurisdiction). Therefore, for example, an eligible elector may vote once where he or she lives (as a "resident" elector) and once where he or she owns other property, such as a cottage, (as a "non-resident" elector).

In addition, Toronto electors vote for one of four school boards dependent upon their combination of Roman Catholic religion and English or French language education rights. Ontario is the only province in Canada that has elections for four distinct school boards (five in the Town of Penetanguishene).

Preferably, any method of compiling voters' lists for the City of Toronto would include mechanisms to permit the capture of data necessary to determine non-resident and school board voting entitlement. If this was not possible, electors would need to declare

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<sup>16</sup> Survey Response from the Chicago Board of Election Commissioners



their non-resident and school board qualifications when they went to vote.

#### 5.4 *Cost to Implement*

While many may say “there is no price to democracy”, reality would dictate that a voters’ list system must be affordable to the City’s taxpayers.

Some of the potential options are more costly than others. For example, as indicated in Section 3.4, using Elections Canada and MPAC’s statistics as a base, it is very roughly estimated that it would cost approximately \$15 million to conduct an enumeration in the City of Toronto for the 2010 election.<sup>17</sup>

Based upon the United States experiences, voter registration systems are also costly. For example, a 2002 study indicated that it cost Michigan \$7.6 million (\$1.97 per elector) to implement a statewide registration system with annual maintenance costs of \$1.4 million (\$0.36 per elector).<sup>18</sup> In 1997 it cost Elections Canada \$13.3 million<sup>19</sup> (\$0.71 per elector) to develop the National Register of Electors with annual costs of \$5.3 million<sup>20</sup> (\$0.23 per elector) to maintain the Register.

It is estimated that the costs associated with using either Elections Canada’s or Elections Ontario’s lists would be similar to the current costs for the MPAC list (\$708,700). However, the City Clerk’s Office would be

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<sup>17</sup> This is a rough estimate. Actual costs could be much more, or less, depending upon a number of variables including, but not limited to, start-up, administrative, human resources and technology costs.

<sup>18</sup> Statewide Voter Registration Databases, Election Reform Briefing, March 2002, p. 8

<sup>19</sup> Report of the Chief Electoral Officer of Canada on the 36<sup>th</sup> General Election, August 22, 1997, p. 17

<sup>20</sup> Survey Response from Elections Canada

required to modify its current technological systems. A very preliminary analysis indicates that these changes could cost anywhere from \$50,000 to \$150,000 depending on the extent of the required modifications.

Using the experience of the City of Edmonton as a base, staff estimate cost savings of \$350,000 per election if the City Clerk were to conduct elections without a voters’ list. This figure includes the savings associated with the elimination of the paper copies of the voters’ list, the technology required to maintain the list, and the additional spending on extra staff in some voting locations as well as an extensive communication campaign.

The costs of managing the voters’ list under the active partnership with MPAC model would remain relatively stable (\$708,700 in 2006). However, additional costs would likely be accrued from the various voter outreach initiatives undertaken to promote the importance of contacting MPAC to update elector information. The amount of the additional costs is dependent upon the extent of the outreach strategy.

#### 5.5 *Advantages and Disadvantages*

There is no one perfect method for compiling voters’ lists; each has its own benefits and risks. Table 7 describes the advantages and disadvantages for each of the potential options.



Table 7: Evaluation of the Potential Options for the Preparation of the City's Voters' List

Considerations	Potential Options				
	No Voters' List	Voter Registration	Active Partnership with MPAC	Provincial or Federal List	Enumeration
Responsibility for Obtaining Data for the Voters' List	Onus on elector	Onus on elector	Onus on state	Onus on state	Onus on state
Legislative Authority	Requires legislative amendment	Requires legislative amendment	Permitted under current legislation	Requires legislative amendment	Requires legislative amendment
Ease of Implementation	Relatively simple to initiate	Requires substantial additional resources	Relatively simple to initiate	Requires technology update	Requires substantial additional resources
Captures School Support	No	Yes	Yes	No	Yes
Captures Non-resident Electors	No	Yes	Yes	No	No
Advantages	<p>Successful in Alberta and Saskatchewan</p> <p>Most environmentally friendly option (save hundreds of thousands of pieces of paper)</p> <p>Most inclusive option – all electors treated equally at voting locations</p>	<p>Creates a “permanent register” of electors for Toronto</p> <p>Could increase public awareness of the voting process and importance of list</p>	<p>MPAC data most current for homeowners</p>	<p>Many members of the public believe there is only one “voters’ list”</p> <p>Federal and provincial governments have agreed to share their lists with the City</p>	<p>A way to ensure data is as accurate as possible (double checking at the source)</p>
Disadvantages	<p>Departure from traditional method</p> <p>Perception that the voters’ list protects the integrity of the system, would have to find an alternative method to keep the perception that the system is secure</p> <p>Voters’ list fundamental to campaign strategies</p>	<p>Extremely expensive – time and resources (City of Chicago has 100 staff who just work on their voter registration program)</p> <p>Barrier to participation – marginalized individuals less likely to register</p> <p>Requires constant updating</p>	<p>After issues with “unconfirmed” individuals on the 2006 PLE, MPAC data may be perceived to be inaccurate</p>	<p>Does not capture school support or non-resident electors</p> <p>Requires change in technology database structure</p>	<p>All jurisdictions have moved away from enumeration – extremely expensive, low response rate</p> <p>Safety issues – staff will not enter certain buildings in the City</p> <p>Language issues – staff will not be able to speak to every voter</p> <p>Requires constant updating</p>
Cost	Less expensive than current method	Much more expensive than current method	Approximate same cost as current method	Slightly more expensive than current method	Much more expensive than current method

## 6.0 Recommendation

There is no perfect method for compiling voters' lists; otherwise there would be only one common method used exclusively throughout the world. The various different systems currently in use are a result of history and tradition, philosophical beliefs and values on the principles of democratic elections and a response to local circumstances.

Given the City's current financial situation, the City Clerk cannot recommend either a voter registration system or an enumeration. Both these methods are extremely expensive to implement and other, less expensive options are available. In addition, they are very labour intensive, necessitating the hiring of many additional staff.

The no voters' list option, while attractive to election administrators for its savings in terms of staff time and costs, may not be embraced by candidates or the public. Candidates in Ontario are accustomed to having a voters' list for campaigning purposes; electors may also question the integrity of a "no list" process.

The partnership with the Municipal Property Assessment Corporation to work collaboratively to produce the City's voters' list may not be acceptable to City Council given its concerns over the accuracy of MPAC's data and whether it is the correct agency to be responsible for the production of the City's preliminary list of electors. Additionally, because of the challenges of the "unconfirmed voter" that occurred during the election, public trust in MPAC's ability to produce an accurate preliminary list has eroded. The partnership arrangement may

be viewed by some as not going far enough to resolve the problems.

The remaining option – obtain a voters' list from either Elections Canada or Elections Ontario – would both be easy to implement and satisfy the majority of the considerations outlined in Section 5.0 of this discussion paper.

In the opinion of the City Clerk, the best option for preparing voters' lists for the City's elections is through the use of Elections Ontario's Permanent Register of Electors, supplemented by information from any source that, in the opinion of the Clerk, is relevant.

This approach would allow the Clerk the flexibility to use data from any source to ensure the voters' list is as accurate as possible heading into an election period. This option would be easy to implement, is cost-effective, supports the principles of democratic elections and continues the Canadian tradition that the government is responsible for collecting electoral information.

The City would also benefit from obtaining a list from an organization whose primary focus is the conduct of elections. As such, Elections Ontario makes decisions about the information to include in its database based solely on elector qualifications.

However, the City would still benefit from MPAC's up-to-date property ownership information since the Permanent Register of Electors is updated with information from both Elections Canada and MPAC through the tripartite agreement.

## 7.0 Methodology

Research for this paper was conducted using a variety of methods – surveys of other jurisdiction's practices, interviews with academics, meetings with officials from Elections Canada and Elections Ontario, ongoing discussions and meetings with Municipal Property Assessment Corporation staff and web research for relevant legislation, annual reports of Canadian electoral agencies and academic papers.

Staff knowledge and experiences, dating back twenty some years, provided the framework for the historic perspective and general voters' list issues.

### 7.1 Survey

A total of twenty-seven surveys were sent covering at least one large city in each Canadian province, all provincial election agencies, Elections Canada and six American jurisdictions. There was a 48 percent response rate to the survey request with responses being received from:

- City of St. John's
- Halifax Regional Municipality
- City of Winnipeg
- City of Saskatoon
- City of Edmonton
- City of Calgary
- City of Vancouver
- Elections PEI
- Elections New Brunswick
- Elections Ontario
- Elections Saskatchewan
- Elections Canada
- Chicago Board of Election Commissioners

The City Clerk's Office wishes to thank those jurisdictions who responded to the survey and provided background information on their methods of compiling voters' lists. Their comments provided valuable insight on the various available options.

### 7.2 Academic Interviews

Interviews were conducted with the following academic members:

- Professor Lawrence LeDuc, University of Toronto (March 22, 2007)
- Dr. Andrew B. Sancton, University of Western Ontario (March 19, 2007 via teleconference)
- Dr. Myer Siemiatycki, Ryerson University (March 15, 2007)

The interview format consisted of a pre-determined series of questions followed by a free-flowing discussion.

- Why do you think that public interest in participating in the political process is declining?
- From a philosophical perspective, should the onus to be on a voters' list be placed on the state or the individual?
- If the responsibility for being added to the voters' list was placed on the individual, do you think that it would alter voting behaviour?
- Based on your subject matter expertise, are there any other factors we should be studying?

The City Clerk wishes to thank these individuals for taking the time from their busy schedules to meet with City staff.

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### *7.3 Meetings with Elections Canada and Elections Ontario*

The City Clerk and the Director of Elections and Registry Services met with Jean-Pierre Kingsley, former Chief Electoral Officer, Elections Canada on January 23, 2007 to discuss voters' list issues and partnership opportunities.

The Elections and Registry Services Unit of the City Clerks' Office has a collaborative working relationship with Elections Ontario, sharing resources on each other's electoral activities. Meetings occur regularly to discuss matters of mutual interest.

The City Clerk appreciates the efforts of these partners to explore opportunities for the sharing of data to improve the City's voters' lists.

### *7.4 Municipal Property Assessment Corporation*

Over the years the Elections and Registry Services Unit of the City Clerks' Office has developed a close working relationship with MPAC staff. Regular meetings are conducted to discuss voters' list issues and the City of Toronto was invited to sit on MPAC's Municipal Liaison Group – Elections.

The City Clerk's Office wishes to thank MPAC staff for providing a description of its processes and for the various statistics referred to in this paper.

### *7.5 Web Research*

Finally, significant research material was obtained through a search of the websites of various election agencies and organizations.

## Appendix “A”

### Comparison of Municipal Voters’ List Compilation Methods

Jurisdiction	Method	Comments
British Columbia	A local government has a choice between: <ul style="list-style-type: none"> <li>• maintaining its own ongoing register, or</li> <li>• using the provincial voters’ list</li> </ul>	<ul style="list-style-type: none"> <li>• Vancouver uses the provincial voters’ list</li> <li>• Of the 122 local jurisdictions who participated in an election administration survey conducted by Civic Info BC, half maintain their own list and the other half use the provincial list</li> </ul>
Alberta	No voters’ list – electors complete Voter Registration forms at the voting place	<ul style="list-style-type: none"> <li>• Calgary does compile a list of electors for administrative purposes – it is used to preprint the Voter Registration forms</li> </ul>
Saskatchewan	No voters’ list – electors register when they go to vote	<ul style="list-style-type: none"> <li>• Has not had a voters’ list since 1991</li> </ul>
Manitoba	Municipalities use a variety of sources to compile their lists, including: <ul style="list-style-type: none"> <li>• Assessment rolls</li> <li>• Tax rolls</li> <li>• Utility billing information</li> <li>• Elections Manitoba voters’ list</li> <li>• National Register of Electors</li> <li>• Telephone or mail enumeration</li> </ul>	<ul style="list-style-type: none"> <li>• Winnipeg uses the National Register of Electors as the basis for its voters’ list</li> </ul>
Ontario	Municipalities obtain their voters’ lists from the Municipal Property Assessment Corporation	<ul style="list-style-type: none"> <li>• MPAC primarily uses land registry information, but also has data sharing arrangements with Elections Ontario and Elections Canada</li> </ul>
Quebec	Municipalities use the provincial voters’ list	
New Brunswick	Provincial voters’ list used for municipal elections	<ul style="list-style-type: none"> <li>• Elections New Brunswick is responsible for running both provincial and municipal elections</li> </ul>
Nova Scotia	Municipalities use the provincial voters’ list	
Prince Edward Island	Provincial voters’ list used for municipal elections	<ul style="list-style-type: none"> <li>• Provincial voters’ list compiled through a door-to-door enumeration</li> </ul>
Newfoundland and Labrador	Municipalities use the provincial voters’ list	<ul style="list-style-type: none"> <li>• The City of St. John’s would like to maintain their own list and is negotiating an agreement with Elections Newfoundland and Labrador to form a partnership to update and exchange information on a regular basis</li> </ul>

## Appendix “B”

### History of How Voters’ List Data Was Collected

Date	Method of Collecting Elector Information
Before 1980	The agency responsible for property assessment, whether municipal or provincial, conducted an annual enumeration to gather the information required for the preparation of lists of electors
1980	Enumeration changed from an annual event to a three-year event, in conjunction with a municipal election  In addition, the property assessment agency collected updated information on a daily on-going basis, e.g. new property ownerships and updated occupant information through property assessment visits, to supplement the data gathered during the enumeration
1985	Municipal enumeration changed from a door-to-door process that took place in early September to a mail based enumeration. A Municipal Enumeration Form was mailed to every household identified in the property assessment database. Typically, the mailing occurred in late April or early May with follow-up on non-respondents in June. Follow-up was in person in 1988 and 1991 and by mail in 1994 and 1997.
1997	Elections Canada creates the National Register of Electors and information is shared between the property assessment database, Elections Ontario and Elections Canada
1998	Province transferred responsibility for property assessment to the Ontario Property Assessment Corporation
1998	Tenant Information Program implemented. Landlords of multiple-residential buildings with seven or more units compelled to provide an annual listing of the names and unit numbers of new tenants, tenants who have moved within or who have left their buildings as of July 1 <sup>st</sup> .
2000	Targeted municipal enumeration conducted - Municipal Enumeration Forms only mailed to those households that could not be matched with the NRE. There was no follow-up with non-respondents.

### History of Ontario’s Municipal Voters’ List

Date	Event
1970	Province of Ontario assumed responsibility for property assessment (before 1970, this was a municipal function)
1972	<i>Municipal Elections Act</i> is enacted and property value requirement is removed from elector qualifications
1988	Elector qualifications amended so that all eligible electors were required to be Canadian citizens (previously British subjects were entitled to vote in municipal elections)
1998	Province transferred responsibility for property assessment to the Ontario Property Assessment Corporation
2001	Legislative amendments altered the composition of the Board of Directors of OPAC and renamed the organization to the Municipal Property Assessment Corporation
2004	AMCTO established a Voters’ List Working Group to prepare recommendations on actions that MPAC could implement to improve data accuracy
2005	MPAC established a Municipal Liaison Group – Elections to discuss matters related to enumeration and municipal elections
2006	Amendments to the <i>Vital Statistics Act</i> permit an institution to apply to the Registrar General to obtain death information
2006	MPAC indicated they are planning to consult with municipal stakeholders on the enumeration experience and to solicit recommendations for change