

ATIPPAReview

From: Lori Moss <lorimoss@smallpoint-adamscove.ca>
Sent: Tuesday, October 6, 2026 1:37 PM
To: ATIPPAReview
Cc: Paul Adams; Town of Small Point - Adam's Cove
Subject: Request for Legislative Review – ATIPP Requirements for Municipalities

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ATIPP Office,

I am writing on behalf of the Town of Small Point-Adam's Cove, a small rural municipality, to raise concerns about the operational impact of the current ATIPP process on small towns and to request legislative or policy changes that would better reflect the capacity of municipal administrations. *Please note that my position is a temporary contract, ending in December, to help the Town in its wildfire recovery efforts. Part of my duties (in this temporary role) has been to assist the Town Clerk with ATIPP requests related to recovery.*

We fully support the principles of transparency and the public's right to access information. However, the administrative burden associated with responding to ATIPP requests can be significant for municipalities with a very small staff, which is most rural communities. Often, the responsibility falls to one employee who is already managing multiple municipal functions and competing priorities. While we do have a full-time Town Clerk, many communities only have a part-time clerk.

As an example of time constraints, our Town Clerk could spend one to two hours each day working on a single ATIPP request simply determining where to begin, then more hours reviewing emails and records, uploading documents, communicating with Requestor and completing redactions manually. When multiple requests are active at the same time, this workload can quickly become unmanageable. Based on our experience, a single request can require approximately 10 hours of staff time, creating a considerable financial and operational cost for a small municipality. Consider that recently our Town Clerk received more than a dozen lengthy ATIPP requests within a short span of a few weeks. Each had to be reviewed for Disregard options, communications to Requestor were organized, conversations with the OIPC were held - all of which take away from capacity to do other necessary work.

In a small municipality, the person responsible for ATIPP is usually also responsible for human resources, administration, communications, and all other essential municipal functions. The additional workload can contribute to role overload, occupational exhaustion, and sustained workplace stress. When staff are required to devote substantial time to complex requests, routine municipal responsibilities and other pressing matters are delayed.

Our experience has highlighted the risk created when a municipality does not have trained ATIPP personnel or lack of ongoing training to oversee a complicated, legislation-heavy program. Even with training, we have had to rely heavily on the ATIPP Office for guidance. While that support is appreciated, it also demonstrates the vulnerability of small municipalities that may have no dedicated ATIPP staff or resources. Multiple requests arriving at the same time can place a disproportionate strain on the municipality's ability to respond appropriately and within required timelines.

An important note regarding mental health and job satisfaction; the fear of making a mistake on an ATIPP request can be crippling for staff.

We would respectfully encourage consideration of safeguards or legislative provisions that recognize the different capacity levels of municipalities. In particular, it may be worthwhile to explore:

- Ongoing training and 'refreshers' on how to interpret requests (line by line support is appreciated);
- Provisions for managing requests that are excessively broad, repetitive, duplicative, or unreasonably burdensome;

- Greater flexibility and/or more reasonable deadlines for municipalities with 1 or 2 staff;
- A process for consolidating substantially similar or overlapping requests;
- Additional support, resources, or centralized services for small municipalities without dedicated ATIPP personnel; and
- Creation of 'nuisance' regulation to support small municipalities where it is clear a Requestor is purposely taking up time with multiple ATIPP requests and harassing staff and Council members. Especially important in small communities where Requestors are often friends and neighbors, making it hard for staff and Council to 'leave work in the office' once they have left work for the day. The lines between the office and personal boundaries are often blurred, even with staff upholding privacy rules, a Requestor may not.

We hope to see a system that maintains those important principles while recognizing the very different operational realities of a municipality with a small administrative team.

We would welcome the opportunity to contribute to any review or discussion of how the ATIPP framework could be made more practical and proportionate for small municipalities across NL.

Thank you for considering these concerns.

Sincerely,

Lori Moss

Wildfire Recovery Coordinator

On behalf of the Council and Town Clerk - Town of Small Point-Adam's Cove

<https://smallpoint-adamscove.ca/>