
March 16, 2012

Commission for the Review of Social Assistance in Ontario
2 Bloor Street West, 4th Floor
Toronto, ON M4W 3E2

Dear Ms. Lankin & Dr. Sheik:

The Ontario Public Health Association (OPHA) and the Association of Local Public Health Agencies (alPHa) are pleased to be submitting a joint response to the Commission for the Review of Social Assistance. OPHA is a member-based not-for-profit organization that has been advancing public health in Ontario for 63 years; alPHa provides leadership and management advice and expertise to boards of health and public health units in Ontario. Together, we represent numerous public health disciplines, board of health members of public health units, medical and associate medical officers of health, senior public health managers, and hundreds of other health professionals.

Both OPHA's and alPHa's members are committed to advancing health equity. Several of the social determinants will be directly affected by the findings of this Commission including: income; social support networks; education and literacy; employment/working conditions; healthy child development; and food security. It is in this context that the work of the Commission is of interest to our members.

We believe that the overall goals of any changes to social assistance must be poverty reduction and income security for people who receive social assistance. Improving the income security of Ontarians will reduce health inequities and have positive long-term impacts on the health care system. Given the current inadequacy of the rate structures for Ontario Works and the Ontario Disability Support Program, any changes to social assistance should operate under the principle of "Do No Harm" to recipients. It is essential that changes do not reduce incomes, create income instability, or remove vital supports to these vulnerable populations. Any savings benefits achieved through administrative reforms should be re-directed back into the system as income supports for recipients. Attached you will find our detailed recommendations on how to achieve this over-arching objective. These recommendations have been developed by health professionals sitting on several of our expert working groups.

Thank you for your consideration. We would be happy to discuss the recommendations with you further. Our contact information is below.

Sincerely



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Discussion Paper 2: Responses to questions from the Review of Social Assistance in Ontario

Chapter 1: Reasonable Expectations and Necessary Supports to Employment

1. How can employment services be made more effective?

- Re-define Employment Services to include assessment of life skills and provide training to develop these skills. During implementation of this training, consider contracting local training programs and schools so that these services are relevant to local labour markets.
- Provide a “One stop shop” where employment related services are co-located in one place (e.g. Employment Insurance, Ontario Disability Support Program, Ontario Works, job searching, resume writing, skills training, stress reduction workshops, etc).
- Advocate for the alignment of information housed at related Federal/Provincial/Municipal agencies. This may be pursued by creating of a single database.
- Strive to provide services that are more direct, culturally appropriate and streamlined.
- Make them more accessible. This includes keeping employment centres open longer, making child care available, offering transportation subsidies and providing wider services in rural areas.

2. What should the Commission recommend to encourage greater consistency in effective employment services and supports for social assistance recipients, while still allowing for local flexibility and innovation?

- Increase the structure and consistency of Employment Supports.
- Create a system that can track employment stages including client activities taken to improve employability (participation in volunteer work, workshops etc.) determine an “ideal” caseload ratio for case managers; incorporate the cost of administration into the calculation of case costs and fund each case accordingly. Provide employment services and information in high schools, colleges and universities, because youth face higher rates of unemployment than the general community.
- Incorporate the affordability of transportation in social assistance supports.
- Broaden the set of measures used to indicate effective employment. These should be more than employment and earnings, which are linked to finding paid work.

3. Should standard assessment tools be used to identify people’s needs and match them to appropriate services and supports?

- Assessment tools can be helpful. L.E.A.P. is an example of such a tool.

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- A standard assessment will establish a baseline and outline the different resources or further assessments that are needed by each individual. A referral process would address the individualized needs. It is important that an assessment tool be client- centered so as to allow the client to make informed decisions about the plan and strategy that meet their needs. This may involve linking them with resources like employment counseling or training, and mental health resources.

4. What should be considered appropriate employment-related activity participation requirements for people with disabilities? Should participation requirements for people with disabilities be different from those for other people receiving social assistance?

- Disabilities must be understood so that levels of participation for persons with disabilities in some activities may be different. For example, some disabilities may require accommodation for engagement in life skills and education workshops or volunteering and community outreach activities. Consider qualitative markers for measurement of participation and a tracking mechanism to show steps to employment.
- Yes, participation requirements for people with disabilities should be different from those for other people receiving social assistance. Life-skill levels vary for both Ontario Works (OW) and Ontario Disability Support Program (ODSP) clients and participation could be mandatory for the former but voluntary for the latter (depending on the severity of disability).

5. Should a tool be developed to assess the work capacity of people with disabilities? If so, how should the tool be developed and how should it be used?

- We have concerns about the limitations of any assessment tool to determine the work capacity of people with disabilities, particularly for people whose conditions change over time, such as episodic disabilities. Any assessment should be oriented to identify opportunities for employment supports and services. Participation agreements that would require people to work in order to obtain financial and other supports may not be feasible for all persons with disabilities. Assessments for employment services and supports should be separate from participation agreements.
- When introducing new tools to practice, it is vital to provide training and information to all staff charged with implementing the new tool.

6. What kinds of engagement strategies and incentives would be most effective in encouraging and supporting employers to hire more social assistance recipients?

- Engage employers who are interested in providing short-term employment contracts to recipients of social assistance.
- Offer incentives for participation, including monetary/financial subsidies.
- Use media channels to advertise and promote opportunities and success stories.
- Alternatively, rather than focusing incentives and supports on employers, focus them instead on the social assistance recipient. Providing training, skills and supports to the recipient in order to better

prepare him for potential job opportunities removes the need to disclose to employers that potential employees are on social assistance.

7. Which approach would be most effective in improving the delivery of employment services?

- Provide a “One stop shop” where employment related services are co-located in one place (e.g. EI, ODSP, OW, job searching, resume writing, skills training, etc).
- Greater community engagement, including soliciting a wider range of community partners.

Chapter 2: Appropriate Benefit Structure

1. Which adequacy and wage benchmarks should be used to set rates? Are there other measures that should be considered?

- We suggest using the “Market Basket Measure” as a start, because it allows the determination of local benchmarks. MBM should also be verified periodically to ensure accuracy, if it will be used to set OW, ODSP and minimum wage rates. However, additional benchmarks could also be used, such as the Low Income Measure (LIM), which Ontario used as the poverty measure in its 2008 Poverty Reduction Strategy.
- Whatever measure is used must determine both adequate social assistance rates and minimum wages so that everyone in Ontario has access to decent living conditions whether they receive social assistance or work full-time.

2. In a methodology for setting rates, what proportions would balance adequacy, fairness and incentives?

- Proportions may need to be re-visited and adjusted as economic conditions change. Currently, most emphasis should be on adequacy. Fairness should be directed more at redressing the increased inequality in incomes, rather than at pitting those on SA against low-income workers. Incentives should be the third component, but until economic conditions improve for decent job opportunities, the SA system shouldn't penalize people for economic conditions over which they have no control.

3. Should health benefits be provided to all eligible low-income Ontarians? If so, how should the cost be covered?

- Yes. Dental, prescription drugs and dietary assistance should be covered by the Ministry of Health and Long Term Care (MOHLTC) directly or in a cost share arrangement with Social Assistance, and Child Services. A pooled insurance benefits program should be investigated further.
- Furthermore, consideration for coverage must be given for low-income earning Ontarians. Benefits should be provided to those individuals not covered by their employers since the loss of health benefits can be a disincentive to work. Access to housing, income and other social assistance benefits need to be viewed through a health lens to maximize health benefits and reduce the exacerbation of health disparities from policy changes.

5. Would an earned income supplement be a good mechanism to increase the incentive to work? If so, how should it be designed?

- Most people have a desire to work, but because of limitations imposed by the current system, as an example loss of health benefits, work may be perceived to be discouraged. A guarantee of benefits

for a period of up to two years of employment, up to a certain income limit or, until proof of employer-provided benefit coverage, would increase the incentive to return to work.

- The amount of benefit supplement should be based on family size as well as income.

8. Should there be a separate basic income program for people with severe disabilities who are unlikely to generate significant earnings?

- A basic income program for people with severe disabilities may not need to be a separate program. However, supplemental funding in addition to the basic rate is encouraged for those with severe disabilities.

11. Should the special dietary needs for all low-income people, including those receiving social assistance, be addressed through the Ministry of Health and Long-Term Care?

While it is agreed that dietary needs are important, suggestions for funding include:

- Adequate living wage, and
- Dietary allowance for all on social assistance.

Any changes to the Special Diet Allowance (DSA) must be based on the Five Principles developed by the ODSP Action Coalition, the Registered Nurses' Association of Ontario and the 25 in 5 Network for Poverty Reduction (<http://25in5.ca/five-principles-for-a-new-nutritional-supplement-program/>). These principles include a clear policy objective of additional financial support for dietary purposes; accessibility, adequacy and equity; a program budget that ensures no one is worse off as a result of transitioning to a new program; and adequate consultation with key stakeholders.

It is very unlikely that any increase in basic social assistance rates would adequately support dietary needs related to medical conditions (in some cases up to \$250 per month). The \$100 food supplement advocated by the OPHA Food Security Workgroup is a preventive strategy for everyone, and OPHA continues to recommend that a \$100 Healthy Food Supplement be provided to all low-income Ontarians. However, it would not meet the needs of people with special medical needs.

The current system for special medical dietary needs covers a wide range of conditions for recipients of social assistance. The DSA should be maintained in social assistance, at least until a broader system is fully operational and it is determined that the five principles outlined above can be protected.

A nutritional benefit for people outside of social assistance could be developed in a model similar to the "sole source of nutrition" form currently completed by physicians for the broader population.

13. Would a housing benefit improve fairness and the incentive to work? If so, how should it be designed?

- Increase access to quality, affordable housing where possible. According to a 2011 backgrounder from the Wellesley Institute, "[p]oor housing is linked to increased illness and premature death, and

a good home provides a stable base for healthy lives and strong communities.” Increasing the availability everywhere of quality, affordable housing would remove the need to provide housing benefits to those seeking social assistance and contribute to improving the overall health of low-income Ontarians. For areas of substantially high housing costs, some benefit to all low-income Ontarians should be available.

Chapter 3: Making the System Easier to Understand

1. Should the social assistance system move from a surveillance approach toward an audit-based system of verification and monitoring?

Switching may not be the appropriate solution. Instead, consider simplifying/streamlining current regulation. It may also be beneficial to conduct a cost/benefit analysis for both systems.

2. What penalties would be required and feasible in an audit-based system?

- Penalties can work, but should not be so severe or long term that it puts the person in worse condition than when they started.
- Incentivize rather than penalize. Give incentives for those who have done well rather than penalizing those who abuse the system.

4. Should asset limits be changed? If so, how?

- Yes, asset limits need to change. Individuals and families need to be able to leverage their savings and assets to exit the system rather than depleting them in order to gain access to the system. OW can adopt the asset limits of ODSP and then decrease this with time to create an incentive to work.
- RRSP contribution amounts can be allowed, in order to encourage planning for future financial stability.

Chapter 4: Viable for the Long Term

1. What are the strengths and weaknesses of these three approaches to the delivery of Ontario Works and ODSP? Are there other approaches that should be considered?

The distinct differences between funding of ODSP and OW are a weakness in this system as it encourages the use of ODSP and discourages the return to work. Efforts should be made to simplify the system and to encourage flexibility to meet the needs of each person who enters the program. This will enhance health opportunities for all.

A possible approach would be to create a system that works like a family health care team. Create a one-stop shop where employment and social skills classes would be held, where people could apply for childcare and housing. The system would flow smoother this way.

2. Should full responsibility for Temporary Care Allowance or Assistance for Children with Severe Disabilities be transferred to the Ministry of Children and Youth Services?

- While it is agreed by most groups that the responsibility for Temporary Care Allowance or Assistance for Children with Severe Disabilities be transferred to the Ministry of Children and Youth Services primarily to integrate and streamline services for families who are in receipt of those services, a review of the entire system is encouraged.
- Communication between Ministries must be enhanced and efforts should be made to keep the user in mind when considering funding for special needs.

Chapter 5: An Integrated Ontario Position on Income Security

1. Are there major and problematic program interactions that we have not mentioned here?

- Deliver monetary assistance to farmers that enable them to hire local individuals; provide incentives for this practice.
- Enhance immigration policies and procedures to address workforce succession and recruitment for high-vacancy/needs job positions, reducing the likelihood that new immigrants will need social assistance.
- Integrate technology and MUST share information between employment and income support programs such as EI, WSIB, CPP, etc.
- Use a health lens when applying social assistance rates so that potential health benefits and savings to the health system are identified and incorporated into the creation of an adequately funded social assistance program.

2. What position should the Commission recommend that Ontario consider taking on specific intergovernmental issues, including First Nations issues, related to income security?

Consider models in which First Nations establish eligibility and other agencies are involved in providing services.

Chapter 6: First Nations and Social Assistance

1. How well do the various approaches set out in the previous chapters align with First Nations' desire for greater control and flexibility with respect to social assistance reform? What other approaches should be considered to meet the needs of First Nations?

It is admirable that First Nations communities have been consulted in the first round of this review. Having asked for their input, it is now important to respect their knowledge and request for autonomy. The statement from ONWAA indicated a need for First Nations Control, First Nations Determination, First Nations Specific and First Nations Based reforms.

While not directly related to social assistance, it is important to consider more public health programming tailored with the assistance of First Nations people as a form of health promotion. This form of control through engagement would serve greater health outcomes.

2. What position should the Commission recommend that Ontario take with the federal government on issues related to First Nations and social assistance?

- Build a system that aligns the philosophies and approaches of the three governments, Federal/Provincial/First Nations. Ideally First Nations values should be acknowledged in provincial programs.
- Ontario should partner with First Nations to address concerns related to social assistance.
- Allow First Nations autonomy to deliver social assistance and employment services.
- Foster communication between Ontario and First Nations but delivery of services may be independent.

Final Comments:

The overall goal of any changes to social assistance must be poverty reduction and income security for people who receive social assistance. Improving the income security of Ontarians will positively impact the well being of the population. Any savings benefits achieved through administrative reforms should be re-directed back into the system as income support for recipients.