



March 14, 2012

**Dr. Frances Lankin and Dr. Munir Sheikh, Commissioners
Social Services Review Commission
2 Bloor Street West
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Toronto Ontario M4W 3E2**

**NOSDA Response to the Commission for the Review of Social Assistance in Ontario
Discussion Paper: Approaches for Reform**

We are pleased to submit the attached Response to your Discussion Paper.

The Northern Ontario Service Deliverers Association (NOSDA) is an incorporated body that brings together all of Northern Ontario's 11 Municipal Service Managers. All eleven are responsible for the local planning, coordination and delivery of a range of community health and social services that the Province of Ontario divested to them to locally manage, including Ontario Works, Social Housing, Children's Services and Land Ambulance. These services represent a significant portion of the social infrastructure of all Northern Ontario's municipalities and also account for a good share of the property taxes that Northern Ontario municipalities dedicate to the social support infrastructure of their municipalities.

The Northern Ontario Service Deliverers Association understands the intricacies of social service delivery in Northern Ontario. We have consulted among ourselves and other key informants in the North, and below is a Summary of our **Response to the Commission for the Review of Social Assistance in Ontario Discussion Paper**:

Chapter 1: Reasonable Expectations and Necessary Supports to Employment

- There be an alignment of employment outcomes between MTCU and MCSS so we are all working towards the same goals.
- Before introducing new initiatives at a Ministry level, there be a commitment to determining the impact on either Ministry i.e. Second Career.
- There should be one employment service delivery agent at the municipal level.
- Employment services should be delivered by NOSDA members because they already have natural linkages with housing, childcare, economic development and collaborative relationships with health. NOSDA members are best positioned to wrap services around the client (client centred approach).
- Service planning be aligned so that it becomes a comprehensive and integrated approach to employment.

- Other supports and services (i.e. Housing, Childcare, etc.) already provided by NOSDA members are fundamental and necessary to moving individuals off social assistance and into employment. Opportunities to model and share best practices be developed where areas are having good success and work to build upon that success.
- There must be consideration of the differences in remote and rural northern geographies i.e. seasonal employment as a viable option. There should also be an acknowledgement that programs and services, including subsidies to employers, accept that seasonal employment is a viable employment opportunity.
- There should be a coordinated approach to employer engagement but one that also recognizes the values of relationships and in the north there are a variety of ways to approach this. Local communities plan how to achieve the best outcomes in relation to employment and that this be integral moving forward.
- All citizens should have access to a full range of employment services with targeted strategies for vulnerable persons and those with disabilities.

Chapter 2: Appropriate Benefit Structure

- There be a single tier delivery system which supports employment and engagement in the community as a potential outcome for all clients (OW and ODSP).
- Further analysis of a single tier delivery system taking into consideration the complex needs of the disabled population and that all recipients should have access to the same range of services, including employment services, be undertaken.
- Further analysis of the costs of universal benefits including a housing allowance and health benefits and the impacts they would have on those living on social assistance be undertaken.
- A rate structure that recognizes the necessity and benefit to moving people out of poverty be developed. In our view, the province needs to introduce a methodology with the feds through the tax system where OW and/or OW/Housing clients can be incentivized off the system into employment.
- Further analysis of a rate structure that supports movement into the labour force and allows for a transition off of social assistance be undertaken.
- Further analysis of any changes that could be made within the current provincial Social Assistance budget to move OW and ODSP rates to a flat rate structure for recipients living outside of subsidized housing be undertaken.

Chapter 3: Easier to Understand

- There be a re-examination of the definition of assets to ensure they make sense from a northern perspective particularly around transportation and second properties.
- They should be allowed to keep those assets for a period of one year before suggesting they have to sell or liquidate, particularly in the forestry, resource extraction or trade occupations.
- Further analysis on a risk based model similar to that of the Equifax Risk Ratings be undertaken with the intent to alleviate work that is being done simply for the sake of work with little or no changes in circumstances.
- Penalties be modeled after other systems in place but with a careful eye on the intent of the program to move individuals to employment and the barriers that penalties can create. Penalties should fit the crime and could be modeled after CRA.
- An audit based system be preferred over a surveillance based approach.
- New risk based models should be watched carefully to determine their effectiveness i.e. EVP.
- Assets should be increased to support movement out of poverty in support of employment outcomes and for those who cannot reasonably be expected to attach to the labour force.

Chapter 4: Viable over the Long Term

- Local planning and decision making is paramount. In large geographies that can mean local planning is necessary in more than one area within an individual NOSDA member area but still can have a regional perspective.
- NOSDA members have expertise in human services planning and delivery.
- NOSDA members have a built in accountability to their citizens and to the provincial and federal governments, therefore planning capacity should be supported through NOSDA members.
- In terms of the issues surrounding Temporary Care, municipalities should not be in the business of determining appropriate parenting, this program could be moved completely to child welfare or that piece could be determined by child welfare and payments flowed through social assistance.

Chapter 5: An Integrated Ontario Position on Income Security

- Continue to support and reinforce integration efforts at a local level.
- Provide opportunities for sharing of best practices on integration at local levels.
- Create a requirement in service planning around this piece and support and foster an integrated environment.
- Consider the development of a coordination body that addresses issues related to integration/collaboration and mandate ministries to engage in a solution's based focus.
- This body should involve representatives from NOSDA members across the province to ensure it is meeting the needs of their communities.

Chapter 6: First Nations and Social Assistance

- Consideration must be given to those First Nations clients that move on and off reserve particularly in the Northern Regions of the province.
- Where there are opportunities to collaborate/share resources in the north this makes sense.

The most common problems faced by our members in the course of their work include:

- Large land area
- Lack of public transportation
- Lower than average median household incomes
- Higher than average unemployment rates and high seasonal unemployment
- Low housing vacancy rates
- A shortage of affordable and rent-geared-to-income housing(for example, there is a capital shortfall of nearly \$75,000,000 in the Investment in Affordable Housing program based on the current requests in Northern Ontario(*NOSDA Affordable Housing Survey, February, 2012*)
- A variety of distinct urban aboriginal issues
- Lack of funding of emergency shelters in rural areas
- Lack of awareness of government programs in Northern communities
- Vulnerability of households on fixed incomes, including seniors-led households faced with high and rising energy costs and increasing property taxes

- Administratively confusing, ongoing rebalancing of uploading and downloading of programs demands a great deal of attention from our administrators to keep up with decisions made in Toronto. We need clearer, more frequent, open and transparent consultation with Queen's Park and flexibility in the implementation of changes in legislation and regulations before they are imposed on the property tax bases of Northern Ontarians. Northern Ontario conditions are sometimes overlooked by legislators and planners (e.g. higher cost per unit of service due to low and few areas of population concentration; large distances between clients, etc.)

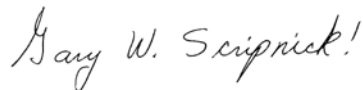
The Social Assistance Review rose out of the need to address the real issues of poverty. Making vast changes in a system without any real improvements in terms of reducing poverty will leave a new system still plagued with the very realities we are already faced with, and this opportunity and your efforts will have been wasted.

NOSDA is committed to continuing to work with the provincial government to ensure that solutions are viable and beneficial to the North.

Should you have any questions, please do not hesitate to contact Fern Dominelli (705) 862-7850 ext. 234 or fern.dominelli@msdsb.net

We look forward to your response at your earliest convenience.

Sincerely,



Gary Scipnick, Chair

Cc: Chris Stewart, Executive Coordinator, NOSDA