



**NORTHERN ONTARIO  
SERVICE DELIVERERS ASSOCIATION**

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

**Approaches for Reform**

**March 2012**

## 1.0 BACKGROUND

The **Northern Ontario Service Deliverers Association (NOSDA)** is an incorporated body that brings together 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. 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.

NOSDA is primarily composed of ten District Social Services Administration Boards (DSSABs), that are unique to Northern Ontario; and ONE municipality (also known as a Consolidated Municipal Service Manager (CMSM)) – the City of Greater Sudbury.

We plan and coordinate the Northern Ontario delivery of public social services and infrastructure programs that result in measurable gains to the quality of life of Northerners through:

- the provision of employment, financial and other supports to persons having difficulty entering or re-entering the labour force;
- the creation, maintenance and provision of affordable, social housing;
- the provision of quality of early learning and child care services that reassure their parents that their children are in safe, nurturing environments while they busy themselves at work or upgrading their skills;
- the provision of emergency medical services in times of personal crisis

**NOSDA** has a proud twelve year history: social infrastructure development and support is the core business of our members. Our intimate understanding of local human services and social infrastructure across all of Northern Ontario explains why **NOSDA's** member Service Managers believe we have significant contributions to make in the development of a comprehensive health and social services network across Northern Ontario.

## **2.0 INTRODUCTION**

The intent of this paper is to focus on those areas where there are differences from a northern perspective in how we do business, the experiences our clients face and the cultural and philosophical challenges there are in the delivery of social assistance in Northern Ontario.

Through discussions with NOSDA members and the communities they serve in Northern Ontario there has been one overriding issue that continues to surface in almost every discussion: the stigma associated with being on social assistance. In the Drummond Report it's addressed through the employment stream, but we feel this is a far deeper issue than simply suggesting people should or could have more successful outcomes if they would just come through another door at an employment service.

Stigma is magnified manifold in smaller communities where there is an increased awareness to individual's and families' personal lives and circumstances. A system that is predicated on judgment and the belief that there are less deserving people in our society will always have challenges of moving those people off social assistance. Stigma is not about the door they arrive through or who helps them in the community, it's about the simple fact they are poor, and often do not have access to the things that as a middle income family has. Those who are poor often have difficulties with education, health issues and the like. These are often referred to as the Determinants of Health.

## **3.0 CONTEXT**

An overview of the Demographic, Educational Attainment, Income and Health Status differences between Northern and Ontario as a whole reveals some of the issues facing social service managers in the North – a declining, aging in place population; lower educational attainment levels inhibiting the development of a strong, well employed labour force; lower employment income; and lower perceived health status relative to the rest of Ontario.

### 3.1 Demographics

As can be noted from Table 1, the population in Northern Ontario declined slightly, by 10,000 persons or 1.4 percent, over the 5 year period between the 2006 and 2011 Census.

**Table 1 Demographic Change 2006 to 2011 Northern Ontario and Ontario, By DSSAB/CMSM Jurisdiction**

DSSAB	2006 Population	2011 Population	% Difference
Algoma	42,513	40,729	-4.2
Cochrane	82,122	81,122	-1.7
Kenora	64,419	57,607	-10.6
Manitoulin-Sudbury	34,484	34,244	-0.6
Nipissing	84,688	84,736	0.1
Parry Sound	40,918	42,162	3
Rainy River	21,564	20,370	-5.5
Sault Ste. Marie	74,948	75,141	0.3
City of Greater Sudbury	157,909	160,376	1.6
Thunder Bay	149,063	146,057	-2
Timiskaming	33,283	32,634	-1.9
All Northern Ontario	785,911	775,178	-1.4
Ontario	12,160,282	12,851,821	5.7

Census of Canada, 2011

### 3.2 Educational Attainment

From Table 2 below, it can be noted that education levels are lower across Northern Ontario than those of Ontario as a whole. Every district in Northern Ontario has a higher rate of the population with less than a high school diploma when compared to the rest of Ontario. The same goes for the percentage of the population with a University degree: not one District in Northern Ontario has a population percentage even close to that of all of Ontario with a University degree. The drop-out rates are generally higher in these areas. There is also less access to Universities, Colleges and funds with which to go to these schools in Northern and rural areas. Therefore, without adequate education, it can more difficult for individuals to provide for their families.

**Table 2**  
**Education Levels in Northern Ontario/Ontario as a Whole, by District – 2006**

<b>Highest Level of Schooling for Population 15 Years of Age and Over – 2006</b>				
<b>District</b>	<b>Total Population 15 Years and Older</b>	<b>Percentage of Population with Less than High School Diploma</b>	<b>Percentage of Population with Trades Certificate or Diploma</b>	<b>Percentage of Population with University Degree</b>
Algoma District	98,255	27.5	10.8	11.9
Kenora District	48,865	38.6	10.3	8.6
Cochrane District	66,455	34.3	12.2	8.1
Manitoulin District	10,565	32.4	11.4	9.3
Sudbury District	17,775	35.1	13.4	6.6
Greater Sudbury Division	129,480	25.7	10.7	13.2
Nipissing District	69,725	26.9	11.1	12.1
Parry Sound District	34,555	28.5	12	10
Rainy River District	17,040	30.1	11.6	9.2
Sault Ste. Marie District	63,556	25.4	9.3	13.8
Thunder Bay District	122,075	26.7	11.5	13.9
Timiskaming District	27,490	34.6	12.8	7.7
Northern Ontario	642,280	29.2	11.3	11.4
Ontario	9,819,420	22.2	8	20.5

Source: Census of Canada, 2006

### **3.3 Income**

From Table 3 below, it can be noted that there is a consistent difference in income between Northern Ontario and Ontario as a whole. Average and median employment income for both part-time and full-time workers in Northern Ontario is at least 10% less than the income for those in Southern parts of Ontario.

Though there are more full-time workers in other parts of Ontario than in Northern Ontario, there is a higher population of part-time workers in Northern Ontario than the rest of Ontario. This also goes to show that the population of Northern Ontario is generally working less hours for lower wages.

**Table 3 Employment Income and Workers, 2005**

	<b>Northern Ontario</b>	<b>Ontario</b>	<b>% Difference</b>
Average Employment Income	\$33,319	\$39,386	15.4
Average Employment Income (Full Time Workers)	\$49,640	\$55,626	10.8
Average Employment Income (Part Time Workers)	\$20,466	\$22,895	10.6
% of Full Time Workers	52.4	56.5	7.8
% of Part Time Workers	47.6	43.5	8.6
Source: Census of Canada, 2006			

### 3.4 Health

From Health statistics in the 2001 Census, Northern Ontario Central Metropolitan Areas (CMAs) had a lower health rate and life expectancy than other CMA's in Ontario, namely Toronto, and Canada as a whole. It was consistent across every chart that Greater Sudbury and Thunder Bay have the lowest life expectancies of all the CMA's listed. There was also generally a higher population of people who had bad health habits and conditions in Northern Ontario when compared to Toronto or Canada.

When talking about self-perceived **unmet** health care needs, Northern Ontario CMA's ranked the highest. Vast areas of Northern Ontario have limited access to health care and emergency services and little to no public transportation to get them to larger urban areas to get the help they need, and increasingly rely on Emergency Medical Transfers as proxies for taxis.

**Table 4 Health Issues**

<b>Health of Canadians Living in Census Metropolitan Areas - 2001</b>				
	<b>Thunder Bay</b>	<b>Greater Sudbury</b>	<b>Toronto</b>	<b>Canada</b>
Life Expectancy at Birth (Age)	77.3	76.7	81	79.4
Self-Rated Health (%)	84.2	83.2	88.3	88
Smokers (% of Population)	25.1	31.1	19.2	24
Heavy Drinkers (% of Population)	21.1	22.8	10.8	16
High Blood Pressure (% of Population)	12.5	16.2	12.5	12.5
Obesity (% of Population)	19.7	18.1	12.5	14.9
	8.3	7.2	6.3	7.1
Self-Perceived Unmet Health Care Needs (% of Population)	17.1	15.1	10	12.3
<b>Source: Census of Canada, 2001</b>				

According to the Rural Ontario Municipal Association (ROMA) Discussion Paper: ‘*A Voice for Rural and Northern Ontario*’ (2011)

“Rural and northern municipalities are facing challenges when providing required services and programs to their citizens. Access to healthcare, social programs, infrastructure demands and the environment, are all competing for municipal funding. Outmigration, a lower employment rate and a rapidly aging population mean that along with the high competition for municipal funding, there is also a lower revenue stream from which to draw for rural and northern communities.

ROMA’s paper suggests that municipalities require a sustainable stream of revenue in order to provide services to citizens. Property taxes generate 45 per cent of municipal revenue and 21 per cent is produced through user fees. In total, 66 per cent of all municipal revenue is generated directly from citizens who live in municipalities. **Municipalities must also deal within fiscal capacity realities that for every tax dollar, municipalities receive 9 cents while the province receives 44 cents and the federal government 47 cents.** At the same time, municipalities deliver the public services that are used most often by Canadian citizens. For rural and northern communities, there are further strains to municipal fiscal capacity. Many rural and northern municipalities have a very small tax base that restricts the ability to raise significant revenues. Due to the often large geographical distances of rural and northern municipalities, user fees can only cover a small portion of the real cost of programs and services. Municipalities don’t have access to income or sales taxes to boost revenues.”

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.)

Below is a summary of the themes and recommendations and parallel the Discussion Paper 2. These real problems impact service delivery of all types – particularly social services – in Northern Ontario.

## **4.0 COMMENTARY**

### **4.1 Chapter 1: Employment**

We know that employment and engagement in the labour force is our primary goal in moving people forward, both from a financial perspective as well in improving their lives in a variety of dimensions. Although employment has been separated out as an issue on its own, we don't believe this should be the case. The fundamental building blocks needed to of move someone forward and engaging them in the workforce are things like safe and stable housing, access to childcare, access to education, transportation issues, access to good quality health care, etc. In Northern Ontario, people who come to NOSDA members have problems. We have approached these issues and problems people have through the provision of a vast array of programs and interventions that offer solutions. We discovered many areas where success had been achieved in solving problems but often this requires many different approaches.

It is that experience that suggests to us that one size does not fit all. Across the North there are areas with very different realities and to suggest that employment services all be delivered in the same manner would not support our communities or the people we serve. Some areas have extraordinarily close relationships with First Nations employment service providers because of their proximities to a First Nation. Others have established integrated approaches with MTCU funded programs. Still others have close linkages with Economic Development and Chambers of Commerce. The one common element about where there has been success has been the "relationship" and where there was a lack of success it was also often about the lack of a "relationship." The success of the employment service provider has also relied on the relationship and trust between service user, employment provider and facilitator in their communities.

There are many stories where NOSDA members have been catalysts for bringing training to their area where none existed before. There are many examples of community college programs being offered where there were existing shortfalls of appropriately skilled labour. This made better sense for our clients. It is evident that



NOSDA members across the north have been were already working towards greater collaboration and if the messaging from both Ministries (the Ministry of Community and Social Services (MCSS) and the Ministry of Training, Colleges and Universities (MTCU)) were consistent there would be greater success.

There are some very real concerns that by moving all employment services to MTCU, service providers may not meet the specialized needs or really help to address the barriers many of our clients face. The solutions that NOSDA members have been engaged in through the delivery of employment and income support programs are not isolated solely to “employment” in the purest sense. They are multi-dimensional and put the client at the centre of a holistic approach to addressing their needs. Without targeted strategies for this client group, they may well end up with the very challenges they currently face in attempting to access employment services outside of our programs.

The other piece that is clear is that the types of services NOSDA members are primarily engaged in from an employment perspective are really focused on the pre-employment piece of preparing clients. They range from helping a client get their driver’s licence to developing curricula for job specific training or behavioral-related training to meet local employer and client needs. The reality of the North is that there are basic barriers that exist for recipients of social assistance like distance, a lack of public (or any) transportation and the many issues of access to programs and services in health care, mental health, counseling and the like. The North has many areas where considerable gaps exist in the range of services being delivered locally. NOSDA members have great experience in developing the infrastructure and relationships needed in communities.

There are also models of collaboration and coordination that exist where there have been very positive outcomes. The vast areas NOSDA members serve all have access to employment services; whereas they may not have access to MTCU or Service Ontario in every community.

There are also some very real and tangible things that can be done to support a more collaborative approach to these services.

We **RECOMMEND** that:

- 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

## **4.2 Chapter 2: Appropriate Benefit Structure**

There is agreement that the benefit structure currently in place does not meet the needs of the clients we serve. A movement to a system where more universal benefits exist for all individuals living in poverty regardless of their attachment to the system seems to make sense. In our discussions, we found that energy cost issues were common for residents in Northern Ontario. Maintenance of heat and energy programs that had traditionally been programs directed at social assistance recipients are now much more broad and targeted towards individuals and families including seniors living in poverty but outside of the current social assistance system. In addition it was thought that simply providing universal benefits that are not all encompassing and are treated as income could just contribute to a new class of poverty, that is, if you create a housing benefit that is deducted from social assistance, this could reduce a portion of the caseload but does not address health related benefits and will not improve a recipient's overall situation.

There was also general consensus that a single program for individuals and families seemed to make the best sense and that regardless of circumstances, that shelter costs and basic needs were still the same. This is an area that requires more careful consideration as the complexity of the Ontario Disability Support Program and the complex health needs of the community should be carefully analyzed before proceeding further. Without more detailed information a comprehensive response is difficult.

Based on our experience as service deliverers, we know that many clients in receipt of ODSP are engaged in services in our NOSDA member offices already either through the provision of employment services, housing services, child care services or

discretionary benefits. We believe all of these things are integral to helping individuals move forward in the labour market. A program with similar supports would be beneficial to ODSP recipients. If this is the case, would it make sense to enhance the existing ODSP program or to create a new program where the two are one at a municipal level? Many clients in receipt of Ontario Works strive to get on ODSP simply because their financial needs dictate it, not because they cannot work. It is a survival strategy while they transition to work which may be a longer process that requires a variety of supports for varying amounts of time, according to the needs of the client.

There may be a way within the existing OW & ODSP Provincial Budget to develop a flat rate structure that would not require the verification of household expenses or the determination of shelter costs. The Ministry would need to determine how many OW & ODSP clients are not receiving the maximum shelter allowance. The only exception would be social assistance recipients residing in subsidized housing. With today's accommodation costs in the private market and a comparison to the OW /ODSP shelter rates, the vast majority of recipients are receiving the maximum shelter allowance for OW & ODSP.

If the province determined the cost of moving all recipients to maximum shelter allowance, the amount required would be surprising negligible. Once that amount is determined and the province can live with this modest increase, the OW & ODSP rate structures could be fixed to a flat amount that includes basic needs and shelter. This would eliminate a large piece of the work staff do verifying eligibility and making shelter cost changes.

Ideally municipalities would like to see recipients in subsidized housing paid the same as clients in the private market as this would go a long way in dealing with the Social Housing infrastructure deficit and maybe overtime this is something that can be achieved.

The resulting flat rate structure, with the exception of subsidized housing, would be simplified and allow staff to dedicate their time to assisting clients with their goals along the road to independence.

All of these things need to be balanced with cost and reasonable funding agreements. Municipalities, not unlike other government levels, cannot bare additional cost implications where no real cost benefit outcomes are evident. We also know this is no easy fix.

Some general observations include:

- All clients should have access to a full range of supports
- All disincentives to engaging in the labour force must be removed
- Movement toward the provision of universal benefits such as a housing allowance and health care benefits is the direction we should be taking where

they are exempt as income from social assistance. We do acknowledge there is a cost impact but the cost-benefit should carefully be analyzed.

- A fair living wage is necessary for those to achieve employment or for those who cannot be reasonably expected to become attached to the labour force

We **RECOMMEND** that:

- 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 as well as 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.

### **4.3 Chapter 3: Easier to Understand**

In the North we believe that an audit based system of verification and monitoring would be a more effective use of time and create some efficiency in the system. We would caution however on the success of the Equifax risk model which is just now being implemented in offices across the province. We do believe it will be a better assessment of risk but the challenges if any existing within are yet to be identified. The high accommodation costs in northern Ontario, often as a result of energy issues, result in a great deal of incremental changes in the system but no outcomes. It also suggests a belief that if there are higher costs we will address them at the NOSDA member/municipal level. The current rate structure does not allow us to do so.

There is a general consensus that penalties for abusing the system should be similar to those that are in place for income tax systems. Where clear intent to defraud the system is determined, those cases should be pursued through the legal system already in place and penalties assessed at that level.

In reference to the question related to assets, there was a consistent direction that asset levels should be higher. The experience in the north has been that in most cases those clients coming through our doors do not have considerable asset levels. In those cases where a vehicle or tools are the assets, we should not be stripping their assets to the point where it exhausts our clients of all available resources so when they do become employed - a crisis, like a late pay cheque - lands the client back on social assistance.

Where asset levels do have impacts in the North are usually around cyclical economic downturns in the resource extraction industries or a sector experiencing massive layoffs such as forestry or mining sector. It is felt that for those individuals who are laid off, they should be allowed to keep those assets for a period of one year before suggesting they have to sell or liquidate them where there are opportunities to re-engage them in the workforce.

The definition of asset can also be problematic as previously identified. There are areas in which an ATV or snowmobile is a mode of transportation, a second vehicle is a necessity in areas where there is no public transportation system, a bush lot may be used to supplement their energy costs through the provision of firewood and the like. Currently we all work to disentangle the legislation to address the needs of the northern client. Careful consideration of northern needs around assets should be looked at when addressing this issue and there should be some flexibility at a local level to make exceptions where unique circumstances are in place.

**We Recommend that:**

- 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 penalties can create. Penalties should fit the crime. They 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

#### 4.4 Chapter 4: Viability

We have spoken of viability issues and the very challenges that all levels of government are facing. We do not see this as a separate issue but one that needs to be front and centre of all decision making on any proposed changes to social assistance. If there is no good rationale and reason to believe that it will lead to good outcomes then we simply shouldn't "make change for change's sake." There needs to be extensive financial analysis done when contemplating changes to components of the social assistance framework. We are all very aware of the cost associated with transitioning programs and services. Municipalities are already challenged financially and many in the northern region are at risk. Populations are declining in the North and federal and provincially mandated programs are expensive to implement. Any further negative financial impacts on these communities will have devastating effects.

One of the questions asked in the Social Assistance Review is where the Temporary Care Allowance should be situated. There was a general consensus that the determination of appropriate care providers is outside of our realm of expertise and that many municipalities felt at risk in doing so without the proper tools and supports. There is a sense however that there should be an alignment/coordination between Children's Services and those in receipt of Temporary Care where we may be able to assist. In some areas they provide benefits to children in receipt of social assistance outside of the Ontario Works/ODSP programs through the Social Assistance Reinvestment funds and we would want to ensure those linkages still exist.

To ensure the Social Assistance system is viable over the Long Term, we **RECOMMEND** that:

- 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 (Northern Issue)
- 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

## 4.5 Chapter 5: Integration

While integration continues to be a theme that exists throughout all efforts we make in delivery of services, there are great lessons to be learned from experiences in the North. It is evident that all are working on some level of integration but the degree to which it exists varies across the vastness of our areas. The word integration is sometimes overwhelming and there may be good reasons why some services remain specialized. There is great value in furthering these efforts where they make sense and that collaboration is what we must achieve.

By becoming generalists we sometimes may lose the intent of what we are trying to achieve, however there may be opportunities where it also makes sense. Under the employment section we talked about greater collaboration between MTCU and MCSS employment services and ministries. The foundational piece to moving people forward and out of poverty is often through the provision of housing and accessing health care. There should be continued efforts to reinforce this through engagement in human service planning, understanding the impacts of one program's intent on another, and the like.

In the North there are examples of where great strides have been made both through the purest sense of integration where one person is responsible for all three program deliveries from intake to case management to areas in which the intake portion of programs is integrated. These models exist for a variety of reasons including efficiencies because the number of clients in the area they serve is small and funding models and labour force availability doesn't support the needs of 1/3 of a person.

The one thing we consistently heard throughout our discussions was that the challenges at a local level have often been overcome and there was an ability and willingness to continue to work on this. However, the challenges created by ministry silos were beyond local control and have significant impacts on efficiencies, workload issues, and serving the client and community. There was a general sense that if there was better collaboration and integration at a ministry level on issues that exist between MMAH, MCSS, MTCU and MOHLTC but that there were opportunities for efficiencies at a local level. Examples of these were challenges related to how income impacts shelter subsidies in housing programs, or the lack of understanding on how Second Career funding should be considered for determining eligibility of social assistance. These things are often worked out once they hit the front line delivery systems, but there could be greater collaboration as they are packaged for delivery which would prevent the confusion for staff, clients, and the other service deliverers we are working with.

At the present time there is no one organization or coalition that works on these issues nor is there a place to raise them. When issues arise, feedback or recommendations are raised back up through the silo from which the policy or program issue emanated. Often what is fed back down is based upon the interpretation of one ministry. There are numerous examples that have risen up as a result of the challenges around privacy and information sharing between programs.

To promote an Integrated Ontario Position on Income Security, ideas to consider include:

- Northern NOSDA members often have functioned in an integrated fashion out of necessity
- We support continued opportunities to integrate and collaborate
- We have concerns that at a ministry level there often appears to be a lack of inter-ministerial integration/collaboration
- We need a body that addresses program integration issue across ministries(e.g. a Policy Field system)
- Issues related to eligibility (for example, how income and assets are treated differently in the three programs we deliver, the impact of earnings on housing subsidies negatively affect clients we are working to move off social assistance), information sharing and privacy challenges among programs, etc. continue to be of concern for NOSDA members

We therefore **RECOMMEND** that:

- 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 could be addressed to and mandate ministries to engage in a solution's based focus.
- This body should involve representatives from NOSDA members and CMSM's across the province to ensure it is meeting the needs of their communities.

#### **4.6 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



## 5.0 SUMMARY

In Summary, the Northern Ontario Service Deliverers Association understands the intricacies of social service delivery in Northern Ontario. We have consulted our members and other key partners 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.
- We believe 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

- A single tier delivery system which supports employment and engagement in the community as a potential outcome for all clients makes sense (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 as well as 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 penalties can create. Penalties should fit the crime. They 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 (Northern Issue)
- 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 could be addressed to 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

## 6.0 CONCLUSION

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 with which we are already faced. We would like to view this opportunity to comment with optimism and hope that your efforts will not 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.**