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March 16 2012

Frances Lankin, Commissioner  
Munir A. Sheikh, Commissioner  
Commission for the Review of Social Assistance in Ontario  
2 Bloor Street West, 4<sup>th</sup> Floor, Suite 400  
Toronto, ON  
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**Re: CUPE Submission to the Commission for the Review of Social Assistance in Ontario**

Dear Commissioners:

CUPE Ontario is pleased to submit for your consideration the attached brief in response to the Commission's *Discussion Paper 2: Approaches for Reform*. The Commission's work is vitally important, especially at a time when more and more Ontarians have come to rely on the social assistance system for much-needed supports.

CUPE is pleased to have the opportunity to outline our positions and recommendations related to the restructuring of social assistance in Ontario. However, we are concerned that at the end of the day, the Liberal government will make the decision to slash social assistance spending as recommended by the Drummond Commission.

CUPE takes the position that economic prosperity cannot be achieved through drastic cuts to public services. Helping to restore Ontario's economic vitality would be achieved by reinvesting in social services, including training and education programs for the unemployed and for those in receipt of social assistance.

CUPE brought together a working group of members who provide Ontario Works services and supports to discuss and develop responses to the questions posed by the Commission in *Discussion Paper 2*. We would be pleased to discuss with you in person our recommendations and ideas for the positive reform of Ontario's social assistance system.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Hahn".

Fred Hahn  
President  
CUPE Ontario

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**Fred Hahn**  
President

**ONE STRONG VOICE**

**Candace Rennick**  
Secretary-Treasurer

***CUPE***

**Submission  
by the Canadian Union of  
Public Employees (CUPE)  
to the  
Commission for the Review of  
Social Assistance in Ontario**

**March 2012**

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## **Introduction**

The Canadian Union of Public Employees (CUPE) is Canada's largest union with approximately 600,000 members. In the province of Ontario, CUPE represents 200,000 plus working women and men, including 30,000 social services workers. Approximately 5,000 of our members provide a range of municipal social services including social assistance and employment related services and supports under the Ontario Works (OW) program.

CUPE has a long and proud history of being a successful and progressive social advocate in matters of social policy development. We are uniquely positioned to comment and provide recommendations on the state of social assistance in Ontario for the following reasons: 1) we represent workers that provide Ontario Works (OW) services and supports; 2) we represent workers that provide additional supports to Ontario Works recipients, and; 3) we represent members at numerous community employment services agencies.

CUPE is pleased to have the opportunity to outline our positions and recommendations related to the restructuring of social assistance in Ontario. However, we are concerned that at the end of the day the Liberal government will make the decision to slash social assistance spending as recommended by the Drummond Commission.

Drummond recommends social assistance spending is brought under control to balance the provincial budget by 2017-18. He also recommends a two-year delay in the planned upload of OW costs from municipal governments to the province. Containing expenditure growth to the recommended 0.5% would reduce total social assistance spending by over \$2 billion by 2017-18 (current expenditure growth on social assistance approximates 5.0% per year). The key driver of social assistance costs is the number of eligible recipients. Therefore, to trim \$2 billion in social assistance spending by 2017-18 the government would likely have to enforce more strict eligibility criteria for social assistance, and reduce benefit levels.

As stated in our first submission, balancing the budget and eliminating the deficit on the backs of workers who provide vital public services and on the people who rely on those services, such as social assistance, is a short sighted solution. Spending cuts and fiscal austerity do not translate into economic growth, just the opposite. In order to grow the economy the McGuinty government ought to be reinvesting in social services, including training and education programs for the unemployed and those in receipt of social assistance.

For this submission, CUPE brought together a working group of members who provide OW services and supports to discuss and develop responses to the questions posed by the Commission in Discussion Paper 2. Our responses are provided below.

## Question 1: How can employment services be made more effective?

CUPE envisions a holistic system of publicly funded and municipally delivered employment services that provide a comprehensive, integrated system of supports. Recent attempts by the province to privatize employment services have resulted in failure. The private company hired by the province to provide employment services to social assistance recipients could not provide services better than that provide by municipalities.

The failed Jobs Now pilot project was a public-private partnership between the provincial government and a for-profit corporation, the B.C. based West Coast Group (WCG). WCG was hired to essentially do the work of CUPE members providing Ontario Works services and supports to people in receipt of social assistance. The company's profits increased the longer a recipient stayed in paid employment.

An independent evaluation of Jobs Now revealed that many jobs were part-time and low-waged. The results-based payment structure of Jobs Now resulted in the placement of clients in inappropriate jobs. One of the main criticisms of for-profit delivery of public services is that the provider's focus shifts from the needs of clients to ensuring increased profits. Another criticism is that providers cherry pick the easiest to serve client population to ensure maximum results and profits. The failed pilot project cost taxpayers \$7.6 million dollars.

The Jobs Now pilot project was similar to a Social Impact Bond (SIB) in that it was a payment by results scheme. We note that Drummond recommends the use of SIBs in the provision of public services. Social Impact Bonds (SIB's) are a form of market-driven privatization that open up the provision of public services to new providers, or social enterprises. SIB's are payment-by-results schemes with payment contingent on agreed outcomes. Privatization schemes stand in direct opposition to CUPE's vision of social assistance as an integrated system of publicly funded and municipally delivered services and supports. It is for this reason that we cannot support the notion of SIBs in the funding and delivery of public services.

Many important client specific employment programs are offered by the community agency sector (e.g. mental health and addictions programming). However, the community sector has been struggling for decades with chronic underfunding and a subsequent loss of capacity to deliver quality public services in a timely and consistent manner due to several years of flat lined budgets. Wages have stagnated and are below the poverty line in some cases. Pension and benefit levels have been eroded. Many workers have no pension or benefits at all.

We believe that the social assistance system must be restructured in such a way that meets recipients' basic needs including nutritious food, clothing and shelter. It is difficult, if impossible, for one to focus on education and training when one is consumed with the daily struggle to pay the rent, bills and put food on the table. CUPE's other recommendations include:

- Expand the mandate of Employment Ontario to provide employment services and programs to all Ontarians, including Ontarians in receipt of social assistance.
- Expanded Employment Ontario services and programs should be provided by all municipalities.
- Increase staffing to address high caseload levels.

- Implement varying levels of program support to reintegrate people into the labour force (a mix of intensive and moderate supports are needed).
- Stabilize funding to ensure consistent, quality programs and delivery.

## **Question 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?**

We recommend the following strategies to achieve “greater consistency in effective employment services and supports for social assistance recipients”:

- Explicitly include in the review of Social Assistance a commitment to ensuring high quality and effective education, training and employment support programs for recipients of OW and ODSP. In the interim, extend eligibility for all provincially funded and/or delivered employment support and training programs to recipients of Social Assistance.
- Ensure that every annual plan required under the Canada-Ontario Labour Market Agreement explicitly includes the provision of high quality and effective education, training and employment supports to people receiving OW and ODSP. Implement an asset-based employment skills assessment tool so that OW and ODSP workers are able to work with client’s strengths with respect to employment prospects.
- Provide training to all workers so they can more readily identify client’s transferable employment skills and abilities.
- Provide training to all workers so they can more readily identify the soft skills that clients may need to improve to re-enter the workforce.
- Conduct a full review of the current Non-Compliance and Quit/Fire Policy under Ontario Legislation. The policy’s punitive nature can create financial hardship for clients and contribute to low self-esteem and morale.
- Provide supports to parents and families to encourage youth to obtain an Ontario Secondary School diploma.
- Include “employment assessment” software on the provincial computer system.
- Implement a funding structure to address specific labour market needs based on different geographic realities.

**Question 3: Should standard assessment tools be used to identify people's needs and match them to appropriate services and supports?**

We believe that the design of any assessment tool ought to be as comprehensive as possible. Such an assessment tool should identify individual's strengths, abilities, skills, literacy level and areas in need of improvement and support. The tool should be designed such that it allows OW and ODSP workers to work with client's employment strengths by, for example, identifying individual's job readiness, training needs, and level of employability. It would also be available to persons with disabilities who want to work in paid employment. The assessment tool should also have system wide availability to all employment specialists through the province-wide computer system.

**Question 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?**

We are opposed to any mandatory employment-related participation requirements for people with disabilities. Any such participation requirements should be voluntary for people with disabilities who want to work in paid employment. Employment assistance benefits (e.g. training, safety boots, etc.) ought to be made available to persons with disabilities who want to work. Further, persons with disabilities who cannot or do not want to enter paid employment should not be penalized for non-compliance.

**Question 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?**

See response to **Question 3**.



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

We have a number of ideas to encourage and support employers to hire more social assistance recipients. For example, municipalities could work with local chambers of commerce, boards of trade, and employers to host job fairs with onsite interviews geared specifically to social assistance recipients. Wage subsidies would also act as an incentive for employers to hire social assistance applicants who may require some additional training support to re-enter the workforce.

Municipalities could partner with transfer payment agencies and local business to develop pilot projects with the goal of transitioning qualified and job ready social assistance recipients to the paid labour force. Caseworkers could work with applicants and local employers to facilitate the transition to employment and to ensure job retention.

Of course, these types of engagement strategies require the assistance of qualified specialists such as job developers, job matchers, labour market researchers, employment counselors, labour force developers and job retention workers, among others.

## **Question 7: Which adequacy and wage benchmarks should be used to set rates? Are there other measures that should be considered?**

As an immediate first step, OW and ODSP rates should be indexed to inflation. Benefit levels should be increased to reflect the actual costs of living for rent, nutritional food, utilities, telephone and transportation. The shelter allowance should be tied to average rents taking into consideration the rising costs of hydro, gasoline, and property insurance, all of which is captured by the shelter component. We also call on the government to eliminate the 3 month, 100% earnings deduction from employment income.

A tightening job market and an increase in part-time and other precarious forms of employment mean that increasing numbers of Ontarians constitute what is commonly known as the working poor. It is important to note that some of the working poor are eligible for OW but some choose not to apply for assistance or are unaware that they're eligible for support.

Additional supports are required for low-income earners. For example, social assistance for low-income earners could be expanded to allow for a top-up to earnings so that people are not working for poverty wages - a move that would be in line with Ontario's poverty reduction strategy.

**Question 8: In a methodology for setting rates, what proportions would balance adequacy, fairness and incentives?**

See response to **Question 7**.

**Question 9: Should health benefits be provided to all eligible low-income Ontarians? If so, how should the cost be covered?**

In our first written submission, we advocated for the establishment of an affordable provincial health and dental plan for all low-income earners. A system of fair taxation could provide all low-income Ontarians access to publicly funded health and dental benefits through the provincial tax base. Income-testing could be used to determine eligibility. All low-income earners who do not receive health and/or dental benefits from their employer would be eligible for benefits under the publicly funded health and dental plan. Larger employers at or above a certain employee and payroll threshold would be required to provide health and dental benefits to its employees to avoid abuse of the publicly funded system. The application process for publicly funded health and dental benefits should be easy to understand and widely available in accessible formats.

**Question 10: Should Ontario use a two-rate approach, based on how long someone requires social assistance? If so, should there be exemptions from starting at the lower short-term rate?**

In a two-rate approach there should be exemptions for people starting at the lower short-term rate. We would also recommend the development of a tool to establish eligibility. Lastly, as stated in our first submission, we recommend that in the short term, all asset tests are delayed for the first 6 months of assistance, as is the case in Newfoundland and Labrador.

However, we maintain that any reengineered rate must adequately provide recipients with the resources necessary to obtain nutritious food and clean and safe shelter for themselves and their dependents. A system that values the self-worth of individuals and provides recipients with a sense of dignity can make the transition from social assistance to paid employment a less traumatic and stigmatizing experience.

**Question 11: Would an earned income supplement be a good mechanism to increase the incentive to work? If so, how should it be designed?**

Any earned income supplement should be available to all low-income Ontarians whether in receipt of social assistance or in paid employment. Income-testing could be used to determine eligibility. While we are not opposed to an earned income supplement for low-income earners it

should be noted that such a supplement would be unnecessary if the minimum wage were poverty-proofed.

In 1995, Ontario's general minimum wage was frozen at \$6.85 an hour for nine years. The 2011 provincial budget keeps the minimum wage at \$10.25 per hour in 2011. Poverty-proofing the minimum wage for full-time workers would mean "raising the minimum wage to a level at which a single adult working full-time, full-year would earn enough income to rise above the poverty line" (Spence, 2009: 7). We would also recommend the minimum wage be indexed to inflation.

### **Recommendations:**

- Immediately increase the minimum wage to \$11. per hour.
- Poverty-proof the minimum wage to free the working poor from a life of poverty.
- Index the minimum wage to annual inflation rates.
- Consult with organized labour on ways to improve the minimum wage.
- Immediately revise the 100% employment earnings deduction during the first 3 months of receiving Ontario Works, and implement either a flat rate exemption of \$500. or immediately apply the 50% employment earnings exemption.

## **Question 12: Would a housing benefit improve fairness and the incentive to work? If so, how should it be designed?**

A new housing benefit should be designed and delivered within the current publicly funded social assistance system and available to all low-income Ontarians. Income testing could determine eligibility. Application forms should be easy to understand, widely available and in accessible formats. Housing is a basic need and human right. Having access to affordable housing allows people to focus on other important goals, such as finding meaningful employment.

In the 1980s and '90s, the federal and provincial governments began to cut funding and download responsibility for affordable social housing to local governments. By the mid 1980s, the federal government implemented funding cuts for new affordable housing; by 1993, almost all federal funding had been cut. Then in 1996 the federal government announced its intention to download the majority of its housing programs to the provinces and territories. The Ontario government cancelled virtually all funding for new affordable housing in 1995. Three years later in 1998 the province commenced the downloading of affordable housing to municipalities.

According to the Wellesley Institute, Ontario has "the worst housing investment record among the provinces. At \$64 per capita, Ontario invests half the provincial average, and less than one-third of the amount invested by nation-leading Saskatchewan. Ontario downloaded housing programs and spending to municipalities and requires them to make a bigger contribution than any other province. Even with modest increases in recent years, provincial housing spending is still the lowest in two decades" (2010: 83)

New social housing units are desperately needed in Ontario, and indeed across the country. The federal government continues to shirk its responsibility to provide affordable social housing

to the thousands of families who continue to struggle with unaffordable and substandard housing. In 1988, 22,000 new social housing units were built in Canada. But by 2002 the number of new social housing units had dwindled to a meager 1,500 for all of Canada (CCSD, Feb. 5, 2010). The supply of new social housing is obviously not keeping up with the demand and the result is long wait lists.

Hundreds of thousands of poor people in Ontario, whether they work or receive social assistance, spend more than half their income on housing. Over a ten year period spanning 1991 to 2001, the number of Ontario households living in unaffordable, substandard, or overcrowded conditions increased from 433,000 to 600,000 households or about 1.7 million women, men and children (Maxwell, 2009: 19).

There are 152,000 households in Ontario waiting for social housing, an 8.0% increase from 2010 and an 18.0% increase since 2009 (ONPHA, 2011). More than 60,000 people are waiting for subsidized housing in Toronto, and another 10,000 plus households in Ottawa. And the wait for social housing can be long. Wait lists in Toronto for social housing can be as long as 140 months; in Ottawa it can take up to 100 months to find social housing (FCM, 2010: 40, Chart 33).

Of course, any discussion about the need for adequate and affordable social housing must take into consideration the social problem that is homelessness. The statistics are alarming and embarrassing for a province as rich as Ontario. In Toronto, 10,000 people are homeless on any given night, including those people living in shelters; the corresponding numbers for Ottawa are 1,000-2,000 homeless people each and every night (CCSD, Feb. 5, 2010).

### **Recommendations:**

- The provincial and federal government should provide sufficient levels of funding such that local governments are able to: increase the affordable housing supply, deliver emergency and supportive housing services, and implement an action plan to prevent and end homelessness.
- Press the federal government to create and fund a National Affordable Housing Program with targets and timelines.
- Invest to bring aging social housing stock up to standard.
- Provide a monthly Housing Benefit to low income tenants to reduce high rent costs.
- Strengthen tenant protection legislation.

### **Question 13: How should income supplements for low-income people with disabilities be designed and delivered? Should such supplements be provided outside the social assistance system?**

Income supplements for low-income people with disabilities should be designed and delivered within the publicly funded social assistance system. See also our responses to **Questions 12 and 17** for more information.

### **Question 14: Should there be a separate basic income program for people with severe disabilities who are unlikely to generate significant earnings?**

We are of the opinion that a separate basic income program for people with severe disabilities already exists within the ODSP. The funding spent on duplicating services and supports would be better spent enhancing ODSP services and programs to ensure that persons with severe disabilities have timely access to the caseworker support they require. Persons with disabilities constitute a vulnerable client population with changing needs. This fact underscores the importance of the one-to-one relationship that caseworkers foster with social assistance recipients, especially as individual's life, work and health circumstances change.

### **Question 15: How should the current rate structure be changed to reduce complexity?**

We agree with the Commission's suggestions for dealing with the complexity of benefits outlined on page 34 of *Discussion Paper 2: Approaches for Reform* (February 2012). We can support a single rate structure for basic needs, shelter and nutritious food as long as regional variations in costs are taken into account, especially in the North where costs are considerably higher than elsewhere in the province. We also agree that the "dependent adult" category should be eliminated for adults not enrolled in post-secondary education.

### **Question 16: Should some special benefits be rolled into a standard rate? If so, which ones?**

We believe that all benefits, including employment assistance benefits and special health benefits should be available through all service delivery agents; however they should not be rolled into a monthly benefit allowance. There should be established guidelines on eligibility. But as we outlined under Question 15, concerns related to regional variations in the costs of nutritious food and housing must also be addressed, particularly for Northern communities.

### **Question 17: 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?**

It is our recommendation that the special diet allowance should be available to all low-income Ontarians. Applications for the allowance should be easy to understand, widely available and in accessible formats. CUPE's other recommendations include:

- Comply with the ruling of the Human Rights Tribunal and reinstate the \$250 per month cut from the Special Diet Program.

- Reinstate SDA coverage for the medical conditions listed below.
- Adopt eligibility standards that will not unreasonably deny individuals access to SDA benefits.
- Implement guidelines that will respect the privacy rights of individuals pertaining to personal medical history and information.

The 2010-11 provincial budget cut the Special Diet Allowance, a program that provided up to \$250 per month in additional funds for social assistance recipients whose health required particular nutritional needs as determined by a physician. This resulted in a 30% income reduction for individuals in receipt of social assistance who also received the special diet allowance. It was the largest cut to social assistance since welfare rates were slashed in 1995 under Mike Harris.

The government's intention was to replace the Special Diet Allowance with a new Nutritional Supplement Program<sup>1</sup> to be administered by the Ministry of Health and Long Term Care. The government cited escalating costs as the primary reason for ending the Special Diet Program. The new Nutritional Supplement Program would have been more restrictive than the Special Diet Program meaning that fewer people would have been eligible for support.

Since that time, the government has decided to revise the Special Diet Allowance, instead of adopting the Nutritional Supplement Program. The revised SDA came into effect April 1 2011. In the interim, the ministry has decided to implement all of the recommendations of the Special Diet Expert Review Committee with respect to the dollar amounts attached to specific dietary requirements. The Review Committee's final report was submitted to the ministry in April 2008. The Review Committee has also recommended government de-list several health conditions that were previously covered by the SDA including:

- Congestive heart failure
- Food allergy – eggs
- Food allergy – soy
- Metabolic bone disease
- Ostomies<sup>2</sup>
- Microcytic anemia (vitamin B12 and folic acid deficiency)
- Macrocytic anemia (iron deficiency anemia)

Other changes to the revised SDA include the requirement that recipients consent to the release of relevant medical information to support their application, which will likely raise issues related to privacy.

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<sup>1</sup> In 2010, the Ontario Human Rights Tribunal ruled “the government was discriminating against (individuals) based on a medical condition or disability, which is a violation of the Human Rights Code” (Toronto Star, February 26 2010). The Tribunal ordered the government to provide more monies to people using the Special Diet Program. Only months later the province decided to scrap the SDA altogether and replace it with a new Nutritional Supplement Program. However, the government has since decided to comply with the Tribunal's ruling as of April 1 2011.

<sup>2</sup> The United Ostomy Associations of America defines ostomy as “the surgically created opening in the body for the discharge of body wastes.” Examples include colostomy and ileostomy.

## **Question 18: How should the different rates for different family types be established?**

The current basic needs rate structure for Ontario Works and Ontario Disability Support Programs cover singles, couples, sole-support parents, and two-adult families with children. We support this structure and feel it is easy to explain and understand. However, the current system does not provide a couple with basic needs assistance equal to two singles. The same problem exists with two-adult families with children. We recommend any new rate structure should address this inadequacy.

## **Question 19: Should the social assistance system move from a surveillance approach toward an audit-based system of verification and monitoring?**

As we state elsewhere in our submission, the vast majority of social assistance recipients do not commit welfare fraud. The move to an audit-based system of verification and monitoring could shift work from surveillance to relationship building and developing case-plans with recipients. However, in an effort to reduce overpayments from a lack of information or a misunderstanding of policies we do support accountability in the Eligibility Verification Process where files with flags (e.g. pending income from another source and high accommodation costs) trigger an eligibility review. The Eligibility Verification Process facilitates case planning and follow-up with recipients who may need referrals to housing programs, the development of accommodation plans, and support with navigating entitlements from other income sources.

## **Question 20: What penalties would be required and feasible in an audit-based system?**

At the outset we want to stress that the vast majority of social assistance recipients do not commit welfare fraud. We also believe that a social assistance system that provided adequate benefit levels and supports would have even fewer instances of fraud. CUPE's recommendations regarding penalties include the following:

- Collect overpayments only if and when people leave the system for paid employment.
- Give people the voluntary option of repaying overpayments while in receipt of social assistance or when they transition to paid employment.
- Administrative overpayments should not have to be recovered and clients penalized (in the past, administrative overpayments could be waived in order to avoid undue hardship for the client).

## **Question 21: What is the right level of risk tolerance, in either the current system or an audit-based system?**

The current level of risk relies upon recipients' self-declaration of changes in circumstances, verification to be provided and background data collection through third-party services. An audit-based system relies on the same self-declaration and third-party checks. However, to propose less verification the risk is increased.

- A system with integrity needs checks and balances to ensure people are not doing things for prolonged periods of time that would result in an overpayment and therefore increased debt.

## **Question 22: Should asset limits be changed? If so, how?**

Asset limits and clawbacks serve to keep poor people poor and perpetuate the cycle of poverty in families. Asset limits guarantee more hardship for social assistance recipients, not less, and that hampers Ontario's economic recovery efforts. Currently, to become eligible for social assistance in Ontario one has to drain all savings and RRSP's. Our recommendations regarding asset limits include the following measures:

### **Recommendations:**

- Conduct a comprehensive review of asset regulations to create a more consistent and fair approach to assets and income.
- Harmonize and increase asset levels for OW and ODSP.
- Raise asset limits for a single ODSP recipient to \$10,000 and \$500 for each additional member of the benefit unit.
- Exempt a further \$5,000 per adult in Tax-Free Savings Accounts and RRSP's as Alberta has done.
- In the longer term, consider a blanket exemption in registered instruments of \$60,000, like Quebec.
- In the short term, delay all asset tests for the first 6 months of assistance, like Newfoundland and Labrador.
- Exempt RRSP's as assets.

## **Question 23: 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?**

When approaching a new service-delivery model for Ontario Works and Ontario Disability Support Programs the focus on relationship-building between caseworkers and recipients is of paramount importance. Caseload size and workload must be examined to allow relationships between recipients and workers to develop so that issues and concerns can be addressed in a thorough and timely manner.



A meeting of CUPE members delivering OW programs and supports found that a majority of members have caseloads in excess of 150; some have caseloads in excess of 200. Our members are concerned about the quality of services they provide a vulnerable client population given such high caseloads. They are concerned that high caseload levels are working against the people they serve. There are now wait lists to see clients. High paperwork expectations and other workload requirements have resulted in many of our members saying their work has become deskilled and impersonal; some don't even know many of their clients. As one worker put it, "clients are numbers now."

High caseload levels are a health and safety concern for our members. Unrealistic caseload expectations may lead to worker burnout, compassion fatigue and stress-related leave, all of which have negative impacts on service quality.

### **Recommendations:**

- The province must provide adequate funding and other resources to address the problem of high worker caseloads. As OMSSA states, "an overburdened caseworker is an ineffective caseworker", which results in clients receiving poorer quality service.
- Fund set caseworker-client ratios similar to the funding of set teacher-student ratios in the education system, and the child care system funds set caregiver-child ratios.
- Adequately fund the social assistance system to support caseload ratios bargained by employers and unions.

CUPE also has concerns regarding the automation of services and transactions, as this could create "virtual relationships" between recipients and caseworkers instead of meaningful face-to-face relationships that should be the focus of social assistance reform.

In April 2010, the Social Services Modernization Project was launched to replace the Service Delivery Management Tool, otherwise known as SDMT. The SDMT is the computerized system that applies the 800 rules and regulations to determine social assistance eligibility and benefit levels. In the words of the ISAC review of the 2004 Matthews report: "It is clear that the SDMT was developed to frustrate rather than support a caseworker system based on client support and advocacy. Computer systems that are inflexible, e.g., the purported computer "glitch" that for months prevented the government from processing the 3% increase to social assistance rates, should be replaced"" (ODSP Action Coalition Access Committee, 2008: 26).

Unlike SDMT, the new software will allow online applications for social housing, child care, ODSP, and OW. The problem is that the software, not a person, will determine initial eligibility for services. Will the design of the new software easily allow people with disabilities access to the system? What about people with low literacy skills? The online applications also reduce the ability to immediately refer people who are ineligible for OW and ODSP to community-based programs that may be able to provide supports.

Front-line workers and their unions must be consulted in the design and implementation of the new computer technology to replace SDMT, known as the Social Services Modernization Project. Accenture (formerly Andersen Consulting) was hired by the province to design and implement the SDMT computer system but workers were never consulted during the process. The results have proved disastrous: workers report increased stress and frustration, increased caseloads, a loss of skills, limited control over their work, and a depersonalized workplace with

little interaction with clients (Hennessy & Sawchuk, 2003). As of 2004, Accenture was paid \$284 million for its work on the Social Services Modernization Project (Conrath and MacMillan, 2004).

### **Recommendations:**

- New technology is welcomed since SDMT has never been effective; however front-line workers and their unions must be consulted in the design and implementation of the new technology.
- The new technology must be safe for workers given the increase in WSIB claims related to repetitive strain injury for OW workers.
- The new technology must be compatible with voice-activated software that should be available to workers and clients with disabilities.
- The intent of the software must be to assist with determining eligibility allowing the worker more time to get to know each client so as to discuss appropriate opportunities for employment and training, and appropriate referral to community agencies and supports.
- The system generated letters should use plain language for clients to understand.

### **Question 24: Should full responsibility for Temporary Care Allowance or Assistance for Children with Severe Disabilities be transferred to the Ministry of Children and Youth Services?**

We agree that the Temporary Care Allowance (TCA) should be transferred to the Ministry of Children and Youth Services “to ensure more consistent oversight of child safety in temporary care situations” (Commission for the Review of Social Assistance in Ontario, February 2012: 47). We recommend that the allowance is fully funded by the province in tandem with adequate program supports and training for front-line workers. We believe the MCYS should provide adequate oversight and funding for children and youth who are no longer in the care of their parents.

### **Question 25: Are there major and problematic program interactions that we have not mentioned here?**

CUPE recommends the elimination of the Assignment of Benefits Process for social assistance applicants/recipients who are waiting for EI Benefits, and instead issue one (1) full month’s assistance. Ontario Works and ODSP caseworkers complete Agreement to Reimburse and Assignment of Benefits forms when recipients are applying for other forms of Income. CUPE recommends building a communication’s structure for information to be shared between agencies to prevent delays in granting and issuing ongoing assistance. We also recommend the simplification of the ODSP application process and the provision of ongoing assistance for those who need help to apply. It should also be noted that proposed federal changes to Old Age Security (OAS) would increase the age of eligibility for OAS to age 67. Such a move would mean that social assistance recipients would receive OW and ODSP assistance for longer periods of time thereby exerting increased financial pressure on the system.

**Question 26: What position should the Commission recommend that Ontario consider taking on specific intergovernmental issues, including First Nations issues, related to income security?**

CUPE's position on various intergovernmental issues are discussed throughout our two submissions. Please see our first submission for a discussion of Employment Insurance, social housing, child care and early learning, the Ontario Child Benefit, minimum wage, and pay equity. In this second submission we also offer a discussion of social housing and the Old Age Security benefit.

**Question 27: 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?**

Our position is that First Nations have authority in the area of social services and an inherent right of self-government. Therefore, First Nations are best positioned to design and deliver a publicly funded social assistance system that complements their culture, customs and beliefs.

**Question 28: What position should the Commission recommend that Ontario take with the federal government on issues related to First Nations and social assistance?**

Our position is that First Nations have authority in the area of social services and an inherent right of self-government. Therefore, First Nations are best positioned to design and deliver a publicly funded social assistance system that complements their culture, customs and beliefs.

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