

The Honourable Carla Qualtrough
Minister of Employment, Workforce Development & Disability Inclusion
House of Commons
Ottawa ON K1A 0A6

VIA EMAIL

April 21, 2020

Dear Minister Qualtrough:

RE: COVID-19 Impacts on People with Disabilities

We are writing to express our concerns about the impact of COVID-19 on people with disabilities across the country, and specifically in BC.

Disability Alliance BC (DABC) is a cross-disability, provincial organization that advocates for the rights of people with disabilities. We are hearing from our members and clients that they fear for their health, safety, and financial well being, and that they have felt left behind in the measures announced in response to the pandemic to date.

We were so pleased to see the creation of the new federal 11-member advisory group to help ensure the voices of people with disabilities are heard during the pandemic. While we understand that provincial governments are responsible for many of the financial and health care measures that would help mitigate the impacts of COVID-19, we hope that the advisory group and federal leadership will work towards a unified national approach to supports and inclusion for people with disabilities during this crisis.

We would also ask that you urgently consider the specific federal issues below.

1. COVID-19 Supports for CPP-Disability Recipients

One issue that falls squarely within federal jurisdiction is CPP-Disability (“CPP-D”) benefits. Many CPP-D recipients are people with chronic illnesses and others who may have acquired a disability later in life after having worked for a number of years.

People who receive CPP-D are facing significant COVID-related impacts. Many are currently at heightened risk of infection and serious illness due to their disabilities, and are unable to leave their homes to purchase essential goods or to attend appointments. Many (if not all) are now incurring additional expenses that may include, among other things, a stock of food in the household, hand sanitizer, disinfectant, gloves and masks, Tylenol, cough medicine and other over-the-counter medications, and delivery costs.

At this point, many CPP-D recipients are not eligible for provincial emergency benefits specifically for low income people with disabilities. For example, the BC government recently announced a \$300 monthly COVID supplement for the next three months for provincial income assistance and disability assistance recipients. Unfortunately, people who solely receive CPP-D are not eligible for the provincial COVID supplement, as their benefits fall under federal jurisdiction. In our view, this leaves a significant gap in the supports available to people with disabilities.

We are also concerned about reassessments of eligibility for CPP-D benefits in the present context. These reassessments cause significant stress during an already difficult time, and can involve insurmountable barriers for those unable to leave their homes (e.g. where a physical exam and/or doctor's note is required).

Finally, we understand that the Social Security Tribunal is no longer receiving mail due to COVID-19. We are concerned that Notices of Appeal sent in by mail are accumulating, and the materials are not being sent out to those parties. We are concerned about the backlog that this will create, as well as accessibility issues for those who do not have access to computers and email.

We urge the federal government to take the following actions in relation to CPP-D:

- **Provide emergency financial supports for people who solely receive CPP-D that align with the emergency supports that provincial governments are providing to people on provincial disability assistance;**
- **Provide a clear statement that receipt of the Canadian Emergency Response Benefit (CERB) will have no effect on a person's entitlement to CPP-D benefits; and**
- **Temporarily suspend reassessments of eligibility for CPP-D (especially where a doctor's report is needed).**
- **Hire additional staff at the Social Security Tribunal to allow safe handling of paper Notices of Appeal and other forms.**

2. Registered Disability Savings Plan (RDSP) & Disability Tax Credit (DTC)

We are also concerned about the effects of the pandemic on long-term financial planning for people with disabilities.

The Registered Disability Savings Plan (RDSP) is a powerful way for eligible people with disabilities to save for their long-term financial security. It also enables people receiving social assistance to protect assets and income. Contributions to an RDSP may be strengthened by federal grants and savings bonds, up to a lifetime maximum of \$90,000. Grants and bonds can be received until December 31 of the year the

beneficiary turns 49. Eligibility for an RDSP is determined based on eligibility for the federal Disability Tax Credit (DTC).

Unsurprisingly, the COVID-19 health emergency (and related financial crisis) has meant that many people are unable to make the RDSP contributions that they would otherwise make. Difficulty in reaching medical professionals and/or attending in person appointments is also posing significant barriers to the DTC/RDSP application process.

We urge the federal government to take the following actions in relation to the RDSP:

- **Allow a one-year extension on all RDSP contribution deadlines to allow those who cannot contribute during this year to do so in subsequent years (including allowing a 49 year old beneficiary to catch up on maximum amounts until age 50).**
- **In the alternative, allow for discretion to extend contribution deadlines on a case by case basis.**

We urge the federal government to take the following actions in relation to the DTC:

- **If the CRA requires additional information, send the questionnaire directly to the applicant rather than the medical practitioner to allow the applicant to proceed with their application if they can meet their doctor remotely;**
- **For applicants turning 49 by December 31st of 2020, recognize DTC applications initiated in 2020 but not approved in time due to COVID, and allow these applicants to still open an RDSP and receive all bonds and grants they are eligible for, including any retroactive amounts, in 2021;**
- **Allow those who are applying for the DTC in 2020, but are not yet approved, to receive the credit from 2020 onwards; and**
- **Where a DTC application is denied, lift or extend deadlines to file a formal objection and/or an appeal to the Tax Court of Canada.**

Thank you in advance for your consideration of the matters above. We would welcome the opportunity to discuss these with you further – please let us know if you have any questions, or would like further information.

Sincerely,

Erin Pritchard
Executive Director: Programs & Policy

Andrew Robb
Staff Lawyer

- c. The Honourable Diane Lebouthillier, Minister of National Revenue
The Honourable Deb Schulte, Minister for Seniors
The Honourable Ahmed Hussen, Minister for Families, Children, and Social
Development