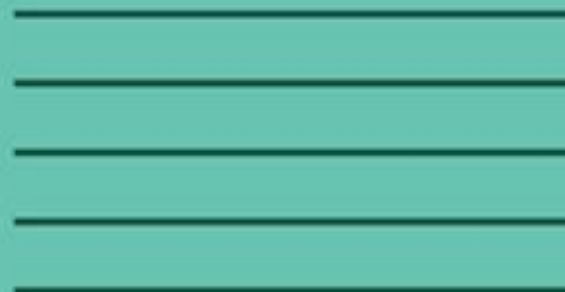




Disability Alliance BC

Recommendations to Update TogetherBC:
BC's Poverty Reduction Strategy
April 2023



April 28, 2023

Dear Honourable Minister Sheila Malcolmson,

Since 1977, Disability Alliance BC (DABC) has been a provincial cross-disability voice that advocates for the rights of people with disabilities. As a non-profit organization, we work to support people with all disabilities to live with dignity, independence, and as equal and full participants in the community. We are submitting our written recommendations to the Ministry of Social Development and Poverty Reduction (SDPR) for consideration in updating TogetherBC: BC's Poverty Reduction Strategy.

In conjunction with this recommendations document, DABC has recently engaged with SDPR as they seek feedback from community organizations on TogetherBC, including a meeting held in February 2023 between DABC and SDPR staff whereby we outlined many of the recommendations written here. DABC also hosted a small-group discussion between clients and members of our network, and SDPR in March 2023.

In addition to the recommendations included here, DABC, as a member of the BC Poverty Reduction Coalition (BCPRC), supports the BCPRC's [submission](#) to the TogetherBC review.

Our recommendations are based on direct feedback from our clients and our membership – most of whom are people with disabilities living on low income. We have witnessed how our clients and our community are affected by poverty. 24.7% of BC's population are people with disabilities,¹ and for many of them, they face two times higher poverty rates, worse housing outcomes and incur higher and additional expenses for basic needs of daily living than persons without disability.² A large majority (71%) of people accessing social assistance in BC are those who receive Disability Assistance (colloquially known as PWD). PWD also accounts for 88% of new clients under social assistance.³ DABC recognizes that Indigenous people with disabilities also face further compounding barriers to poverty reduction. DABC wishes to echo West Coast LEAF's [recommendation](#) in prioritizing Indigenous Poverty Reduction Measures, and in particular, wishes to highlight the recent report titled, [INCOME SUPPORTS AND INDIGENOUS PEOPLES IN B.C.: An Analysis of Gaps and Barriers](#) produced by the First Nations Leadership Council.

We recognize that none of these recommendations would be as compelling without the stories and lived experience of those who are living in poverty. With this in mind, we recommend that SDPR read this submission in conjunction with publicly shared experiences. For instance, we are inspired by the interviews collected in this [document](#), published by the Insufficient Art Project, among many others shared online, in the media, and in publications that place the lived experiences of people with disabilities at the centre.

Recommendations

- 1) Establish PWD as a separate program from Income Assistance**
- 2) Broaden criteria in the PWD application to reflect the wider implications of disability.**
- 3) Expand qualification for designated medical professionals to complete the PWD application**
- 4) Expand qualification to apply for PWD as a prescribed class.**
- 5) Increase the social assistance rates indexed to inflation as guaranteed in legislation**
- 6) Expand eligibility criteria of assistive devices coverage beyond PWD clients**
- 7) Expand Plan C extended healthcare coverage**
- 8) Reduce income-testing requirements for people on PWD**
- 9) Ease clawbacks on unearned income for people on PWD**

Rationale

1. Establish PWD as a separate program from Income Assistance

DABC believes that placing PWD within the social assistance system serves to reinforce discrimination and stigmatization towards people with disabilities.

Income Assistance (IA) is designed to provide short term assistance as a measure of “last resort” for those facing temporary problems. By having the PWD system nested within the IA system, it transfers that intention of

“temporary” assistance to those on PWD and fails to acknowledge the life-altering, often long-term nature of many disabilities that requires sustained and committed financial support that is needed in order to ensure meaningful participation of people with disabilities within the wider society and economy as a whole. This is especially evident in the routine monthly reporting that PWD recipients must provide in order to demonstrate that they are still within the financial eligibility requirements to receive assistance. This level of reporting and investigative nature by SDPR removes the agency of PWD recipients in obtaining financial freedom.

Having PWD as a separate system would enable people with disabilities to achieve an adequate basic income, with enhanced supplements, that would fully appreciate the long term financial and extended support required by many low income people with disabilities. This separate system would also positively acknowledge the rights and dignities of people with disabilities, and the responsibility of the BC Government to actively support their inclusion in our society.

DABC recommends that SDPR create a separate financial assistance and supports system which would provide a guaranteed income for all low income people with disabilities.

2. Broaden criteria in the PWD application to reflect the wider implications of disability.

The current PWD application process discourages people from accessing much needed support. Many PWD applicants have met with great difficulty and have often had to go through lengthy appeals before having their application approved.

The application process in and of itself can be a degrading experience for an individual, who may already feel demoralized due to public perception that income assistance is a “hand out”. To further go through the PWD application process where one needs to “prove” their disability in great detail in order to receive income, is an insult to many. Further, stigmatization towards people with disabilities, especially those with

“invisible” disabilities, is still very much prevalent in the healthcare sector, as evidenced by experiences shared from DABC clients.

In 2021, The Union of BC Indian Chiefs passed a [resolution](#) calling for the decolonization of the PWD application process, as the current application “does not adequately support, respect, and respond to the cultural, mental, and physical needs of Indigenous applicants, and instead reinforces cultural divisions and inequities between Indigenous peoples and non-Indigenous peoples.”⁴ DABC fully supports this resolution.

DABC recommends that SDPR expand the PWD application eligibility criteria that recognizes a more inclusive process for individuals to declare their disability.

3. Expand qualification for designated medical professionals to complete the PWD application

DABC has heard from many clients the difficulties in accessing a doctor or nurse practitioner available in their community to provide the assessment needed for section 2 of the PWD application. DABC has also heard from PWD applicants who either have recently moved to BC or, due to the nature of their disability are better placed to be treated by a specialist from outside the province, would benefit greatly by having their medical professional from outside of BC complete section 2 of the PWD application. It is in the best interest of PWD applicants to have a medical professional who knows their medical history well enough to adequately fill out the PWD application.

DABC recommends that SDPR include other classes of medical professionals and those practicing medicine or nursing in other provinces to support the PWD application.

4. Expand qualification to apply for PWD as a prescribed class.

DABC recommends that SDPR streamline the PWD application process by recognizing those who have already gone through a similar application, such as:

- Individuals who have been approved for disability assistance in another province and who have then moved to BC

- Recipients of the Disability Tax Credit

DABC argues that the above situations are similar to the current process for Canada Pension Plan – Disability (CPP-D) applicants, who may submit a streamlined application. As CPP-D and DTC applicants, as well individuals who have applied for disability assistance in other provinces, have already undertaken an assessment of disability with a medical professional through these application processes, a full PWD application is not needed.

DABC reiterates the need for SDPR to consider that the level of stress and pressure on individuals to “prove” their disability can be mitigated against through finding ways to streamline the process. Examining instances where individuals who have already gone through an application process for a different disability benefit should not need to go through the same validation process again.

5. Increase social assistance rates indexed to inflation as guaranteed in legislation

In our official [review](#) of the 2023 Budget, DABC stated our relief to see an increase in the shelter rate for people on social assistance; an increase that has been long overdue. The shelter rate, which hasn’t changed since 2007, will increase from \$375 per month to \$500 per month for single individuals in July 2023. For a single person on PWD, this means their rate will go from \$1,358 to \$1,483 per month.

Undoubtedly, rent prices have increased by much more than \$125 since 2007, so while we recognize that this shelter rate increase is a step in the right direction, it fails to meaningfully address systemic poverty in our province. DABC has heard from clients on PWD who continue to have to make impossible decisions between essentials like food, medication, rent, and utilities. Therefore, the current rate of PWD will continue to impact the quality of life, health and well being of low-income people with disabilities.

The poverty line for the majority of the province is roughly \$2100 per month for a single individual,⁵ and so this recent rate increase still will not meet the poverty line. While the [BC Basic Income Panel report](#) recommends that PWD be increased to match the poverty line,⁶ DABC further argues that people with disabilities will most certainly have additional disability-related

costs to incur on a regular basis, which goes beyond what a person without a disability would incur. Therefore, the current poverty line does not reflect the higher cost of living for people with disabilities. DABC highlights the BCPRC statement in their Blueprint for Justice: “we must not mistake Canada’s Market Basket Measure poverty line for a finish line. Shifting people marginally past a low threshold may achieve a statistical benchmark, but it does not signal that their fundamental human rights have been met. The poverty line is not a benchmark by which to measure the achievement of secure, full-time, unionized work with all the benefits workers and families deserve.”⁷

DABC recommends that SDPR increase the PWD rate, including indexed year on year for inflation and guaranteed within legislation. This will ensure PWD recipients peace of mind with their financial security rather than depend on the whim of whichever political party is in government at any time.

6. Expand eligibility criteria of assistive devices coverage beyond PWD clients

As noted above, there is an inherent cost in having a disability. Many people with disabilities have higher daily living expenses, such as extra healthcare costs including medical equipment, caregiving and home support, education and employment costs including assistive technology.

In the context of assistive devices, most provinces (except BC) have broad programs for access to assistive devices that are not tied to income, but focus instead on ability. Ontario’s Assistive Devices Program is not income tested; rather, it is available to any resident with a valid health card that has a long-term physical disability.⁸ In Quebec, assistive devices are available free of charge to anyone with a physical or intellectual disability or autism spectrum disorder that is covered by the provincial health plan.⁹ Alberta’s Aids to Daily Living Program provides a broad range of assistive devices to anyone with a long-term disability, chronic illness or terminal illness that has an Alberta health care card; it is a cost share program, but low income people do not pay the cost-sharing portion.¹⁰

In BC, most financial coverage available for adults for these devices is available for people on PWD only. Those that do not qualify for PWD can

apply for certain types of medical equipment and assistive devices only if they can establish that it is needed to meet a “direct and imminent life-threatening need”, and they have an extremely low income.¹¹ Many applicants fail to meet this strict criteria. People with disabilities who do not qualify for PWD are left to purchase expensive medical equipment and assistive devices on their own or to seek out help from non-profits and charities. In addition, many people who acquire a disability after retirement age are shocked to find there is no government financial assistance for assistive devices. This is not a minor issue. As noted by ARCH Disability Law Centre, assistive devices “can be the difference between independence, inclusion and participation in daily activities.”¹²

DABC recommends that SDPR expand eligibility beyond PWD clients to include other people with disabilities, including seniors and people who receive CPP-D.

7. Expand Plan C extended healthcare coverage

The BC Expert Panel on Basic Income recommends an approach of reducing “extended benefits coverage as income rises, using an approach similar to Fair Pharmacare”¹³. DABC further argues that in order for this approach to be successful, Pharmacare and MSP should be improved to expand coverage of prescriptions and treatments that are not currently covered under this system. In particular, DABC acknowledges that people living with mental health disabilities have felt ostracized from the PWD system as treatments such as counselling and psychiatric care are in large part not covered within the healthcare system.

Further, the current \$23 supplement for extended therapies¹ provided to PWD recipients is not effective in providing any financial relief as DABC has heard from clients that many practitioners often refuse to provide treatments to PWD clients as the administrative cost alone to apply for reimbursement from either MSP or the Ministry is more than \$23.

DABC recommends that SDPR collaborate with the Ministry of Health to increase and expand Plan C coverage, especially within the context of low income people with disabilities who are not on PWD, and who are often the

¹ Extended therapies includes: acupuncture, chiropractic, massage therapy, naturopathy, podiatry and physical therapy. It does not include any mental-health related therapies

most affected by this lack of coverage due to additional prescription and treatment costs.

8. Reduce income-testing requirements for people on PWD

The current PWD system disincentivizes recipients from actively seeking out opportunities that would improve their life situation (such as a full-time job, living with a partner/spouse, joining a rehabilitation facility for treatment, or travelling outside of the province) because of fear that their PWD income would be clawed back or revoked altogether. The level of restrictions currently imposed on PWD recipients in order to continue receiving assistance negatively affects the life choices of these recipients to such a degree that the Ministry has inadvertently established a class system in BC whereby low income people with disabilities are not afforded the same freedoms as everyone else.

DABC recommends that SDPR simplify the income testing process for PWD applicants, and that ongoing income testing to prove continued eligibility for assistance be structurally overhauled to heavily reduce the amount of reporting that currently PWD recipients are obligated to provide.

9. Ease clawbacks on unearned income for people on PWD

Currently, unearned, unexempted income received by PWD recipients are clawed back dollar for dollar from their monthly PWD income. The IA application process and the ongoing PWD monthly reporting process, has been given the term “welfare wall” which disincentivizes PWD recipients from earning too much, or accessing other benefits like CPP-D, lest they have their PWD pay clawed back or removed entirely. The BC Expert Panel on Basic Income suggests that clawbacks should be changed from 100% to 70%. DABC agrees that this would be a large improvement on the current treatment of unearned, unexempted income, however, we argue that CPP-D payments should not be clawed back at all.

For those who are no longer able to work, DABC is aware of the practice that SDPR takes in requiring PWD recipients to apply for CPP-D. Since CPP-D is taxable income and PWD income is not, the PWD client is worse

off financially when their PWD income is clawed back as they ultimately would need to pay taxes on the CPP-D income. This is discriminatory.

For those on PWD who are able to work, DABC believes that income replacement systems like employment insurance (EI) should be treated as earned income, not unearned income because workers contribute their employment earnings to EI through a deduction in their pay cheque. Everyone who pays EI premiums can rely on EI benefits being there when they need them, including PWD clients, however the difference is that PWD clients “are required to pursue and accept the other income or means of support,”¹⁴ meaning that they must accept EI benefits if they are eligible for them, but have no recourse to stop their PWD income from being clawed back. DABC believes this clawback of EI benefits is discriminatory against PWD clients, which hinders them from escaping the cycle of poverty. This argument was reflected in our [letter](#) to the Ministry in March 2022.

DABC recommends that SDPR exempt all unearned income.

Conclusion

DABC acknowledges the policy changes that SDPR has enacted over the years which have resulted in improved quality of life for low income people with disabilities in our province.¹⁵ Ultimately, we believe that further action is needed to provide stronger, more robust supports for people with disabilities living in poverty.

DABC welcomes open, sincere dialogue with SDPR and the Province in working towards meaningful poverty reduction measures for low income British Columbians with disabilities.

Sincerely,

A handwritten signature in blue ink that reads "Helaine Boyd". The signature is written in a cursive, flowing style.

Helaine Boyd
Executive Director
Disability Alliance BC

¹ Canadian Survey on Disability (2018). Persons with and without disabilities aged 15 years and over, by age group and sex, Canada, provinces and territories (Table 13-10-0374-0). Statistics Canada.

<https://doi.org/10.25318/1310037401-eng>

² Scott, C.W.M., Berrigan, P., Kneebone, R.D. et al. Disability Considerations for Measuring Poverty in Canada Using the Market Basket Measure. Soc Indic Res (2022). <https://doi.org/10.1007/s11205-022-02900-1>

³ <https://maytree.com/social-assistance-summaries/british-columbia/>

⁴ Page 42 of

https://d3n8a8pro7vhmx.cloudfront.net/ubcic/pages/132/attachments/original/1615323503/2021FebCC_FinalResolutions_Combined.pdf?1615323503

⁵ <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110006601>

⁶ Page 39 of https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

⁷ <https://www.bcpovertyreduction.ca/full-blueprint/economic-security>

⁸ <https://www.ontario.ca/page/assistive-devices-program>

⁹ <https://www.quebec.ca/en/health/health-system-and-services/assistive-devices-disabilities-andhandicaps/assistive-devices-programs-for-persons-with-a-physical-or-intellectual-disability-or-an-autismspectrum-disorder-asd/>

¹⁰ <https://www.alberta.ca/alberta-aids-to-daily-living.aspx>

¹¹ Employment and Assistance Regulation, BC Reg 263/2002, s. 76; Employment and Assistance for Persons with Disabilities Regulation, BC Reg 265/2002, s. 69.

¹² <https://archdisabilitylaw.ca/resource/arch-bulletin-on-covid-19-ontario-assistive-devices-program/>

¹³ BC Expert Panel on Basic Income. (2020). *Covering All the Basics: Reforms for a More Just Society*. Page 501.

https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

¹⁴ <https://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual/eligibility/pursuing-income>

¹⁵ <https://engage.gov.bc.ca/povertyreduction/actions-to-date/> and <https://disabilityalliancebc.org/community-update-province-announces-policy-changes-aimed-at-reducing-poverty/>