



May 30, 2022

SENT VIA EMAIL: MinisterMCCSS@ontario.ca

Hon. Dr. Merrilee Fullerton
Minister of Children, Community and Social Services
375 University Avenue, 5th Floor
Toronto, ON M7A 1G1

Dear Dr. Fullerton,

RE: Changes to Ontario's Social Assistance Programs

We are writing to share our concerns about the modernization of Ontario's social assistance system.

We work at Mississauga Community Legal Services, the community legal clinic that has been serving the City of Mississauga since 1978. Mississauga is Canada's sixth largest city and the third largest city in Ontario, and there is an enormous need for legal services for our growing population. We serve the most vulnerable on issues that are most critical to them, including affordable and secure housing, income security, human rights, disability programs, workers' rights, and immigration. Our work is aimed at ensuring that people with low incomes are able to meet their most basic needs, giving them the ability to live healthy lives, in dignity, as active members of society.

The Social Assistance Modernization Project Needs to Halt

The social assistance system is supposed to serve some of Ontario's most vulnerable individuals, and we fear their needs are not fully understood or being properly addressed. We ask that the current modernization project be paused until the program design is fully explained and until the rollout to date can be studied and the findings are made public.

We also ask that policy makers make sure that the needs of the marginalized members of our society are considered in all of their complexity. Certain groups make up a disproportionate number of the people in Ontario who live in poverty. These are Indigenous, Black and racialized people, along with people with disabilities, women, and people with precarious immigration. We are deeply concerned that a side effect of the current modernization process is that it dehumanizes the people who rely on social assistance and strips them of their dignity.

Social Assistance Rates Are Too Low

Social assistance rates for an Ontario Disability Support Program (ODSP) single recipient is currently \$672 for their basic necessities and \$497 for shelter allowance costs. An Ontario Works (OW) recipient currently receives only \$343 for basic necessities and \$390 for shelter allowance. These numbers are in no way reflective of the cost of living in

Mississauga, nor many other areas of the province. We request that this budget increase ODSP and OW rates to reflect the real cost of living, and that rates be adjusted annually for inflation. A Social Assistance Rate Board should be established to help determine rational and just criteria for setting social assistance rates. We also ask that shelter allowances be increased to reflect the realistic cost of housing in today's market. Both Ontario Works and Ontario Disability Support are currently shamefully far below the poverty line, with Ontario Works recipients currently receiving only 37% of the LIM-AT Low Income Measure threshold. (Source: <https://www.povertyfreeontario.ca/poverty-in-ontario/status-of-poverty-in-ontario>)

Current policies mean that individuals who rely on OW or ODSP benefits are forced to live in deep poverty. Social assistance rates have been frozen since 2018. Inflation has gone up over 10% since 2018. The frozen rates, combined with rising inflation, have the effect of a benefit cut.

The current housing crisis means that market rents are beyond the reach of most recipients. People on social assistance are also finding it impossible to afford food, medical supplies, digital access, transportation and disability supports. It goes without saying that they have no cushion for emergencies, as they are struggling to survive from day to day.

Deep poverty and a life of scarcity make seeking employment impossible. People who live in poverty are forced to devote the majority of their time and energy on survival. The goal of stabilizing lives is impossible without raising the rates.

The Current Social Assistance Program Traps People in Poverty

The current social assistance system focuses on punishment rather than providing support, despite the fact the laws that created the system state that their goal is to improve the lives of the people who use it.

The existing program rules claw back any earnings above a certain level or prevent recipients from keeping all of their other benefits (Canada Pension Plan Disability, for example). The rules discourage people from working because they are worried about losing important benefits, particularly health and other benefits that are inaccessible on low wages from precarious employment and contract work. As well, workplaces fail to accommodate people with disabilities adequately.

The Modernization Project Needs More Transparency

Modernization is racing forward. This once-in-a-generation overhaul of the social assistance system is proceeding with limited consultation with the people who are affected.

The Social Assistance Renewal project began in 2020 and is currently planned until 2024. It falls under Ministry of Children, Community and Social Services (MCCSS) and centralizes the administration of Ontario's social assistance programs. So far, MCCSS has provided minimal results about the impact of any aspect of the Social Assistance

Renewal's rollout. Its Employment Services Transformation (EST) is moving ahead without any studies or results on outcomes from its first three prototypes. It is unclear if any studies are planned (for Social Assistance Renewal) or if the findings of the ones that are (Goss Gilroy Inc. for EST) will ever be made public.

We Have Concerns About the Rollout So Far

The centralization of the social assistance programs means that, at the application stage, only complex or high risk cases are referred to local offices. MCCSS has not shared what the threshold is for either of these.

Modernization also includes a move towards digitization for both the application phase and for ongoing communication. MCCSS developed a new digital communication tool, MyBenefits, to communicate with recipients. The process relies on automated data matching, which can speed up the application process. Unfortunately, it also leads to errors. Clients are streamed by means of a digital standardized questionnaire, which forces applicants to oversimplify their situations.

With MyBenefits, there is an expectation that recipients will use technology to access their information, but policy makers must take into account that this is an additional barrier for many. These individuals will need access to phones or computers and need to be able to afford internet fees or phone minutes. Many Mississauga recipients struggle with English or technology, and so they rely on friends or relatives to help them navigate the digital platforms; this means even more barriers to getting important information to social assistance recipients.

We are asking for a pause of both parts of the modernization rollout until there is a full consultation with clients and communities who are most affected by these changes.

Wraparound Services Are Critical and Need to Be Properly Funded

We are concerned about the lack of transparency around municipal-provincial funding agreements. This means a lack of clarity on how wraparound services will be funded in local communities.

Wraparound services are critical to addressing barriers to employment and allowing people to live in dignity. Necessary services include supports for childcare, disability, food security, housing, literacy and language learning, mental health and addiction, settlement, training and education, and transportation. These services must also be trauma-informed and culturally appropriate. There needs to be an immediate influx of financial and program support and a plan for each wraparound service for the duration of the Province's mandate.

Municipalities need to be equal partners in this process. As well, Ontario needs to invest in services rather than off-load the responsibility to third-party service providers focused on earning a one-time lump sum. The focus needs to be on improving the lives of social assistance recipients for the long term.

People with Disabilities Can't Be Forgotten

People with disabilities are twice as likely to live in poverty. ODSP caseloads are on the rise because of reduced coverage by the Workplace Safety Insurance Board (WSIB) and private insurance plans. This means ODSP is no longer a program of last resort—for most people with disabilities, it is their only option.

The extraordinary costs of living with a disability is unique to each person and adds to their cost of living. Workplaces do not accommodate people with disabilities adequately, including those with episodic disabilities who might work but irregularly. We need decision makers to step up and help develop a plan to make workplaces more accommodating.

Newcomers Have Unique Needs

Mississauga has a diverse population and is home to people from all over the world. People who are new to Canada often have precarious immigration status and many do not qualify for social assistance benefits. This increases their rates of poverty. Newcomers need resources and supports tailored to their needs. These individuals often have difficulty accessing work because of a lack of “Canadian experience” and discrimination.

A strong society works to protect its most vulnerable members. We ask that you consider the importance of providing supports to people living in poverty in Mississauga and throughout Ontario.

Yours truly,
The Social Assistance Team

MISSISSAUGA COMMUNITY LEGAL SERVICES



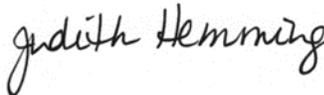
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