



CITY OF HAMILTON

COMMUNITY SERVICES DEPARTMENT ***Social Development & Early Childhood Services Division***

TO: Chair and Members Emergency & Community Services Committee	WARD(S) AFFECTED: CITY WIDE
COMMITTEE DATE: February 11, 2013	
SUBJECT/REPORT NO: Beginning the Dialogue: City of Hamilton's Response to the Commission for the Review of Social Assistance in Ontario's Final Report – Brighter Prospects: Transforming Social Assistance in Ontario (CS13007) (City Wide)	
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SIGNATURE:	

RECOMMENDATION

That Appendix A to Report CS13007, Beginning the Dialogue: City of Hamilton's Response to the Commission for the Review of Social Assistance in Ontario's Final Report – Brighter Prospects: Transforming Social Assistance in Ontario, be forwarded on to the Association of Municipalities of Ontario (AMO), the Ontario Municipal Social Services Association (OMSSA) and the Federation of Canadian Municipalities (FCM).

EXECUTIVE SUMMARY

On October 24, 2012, the Commission for the Review of Social Assistance in Ontario tabled its final report, Brighter Prospects: Transforming Social Assistance in Ontario. This report was commissioned as part of the province's poverty reduction strategy and represents one of the most significant reviews of the social assistance program in Ontario in over twenty years.

The Commission's final report puts forward a model designed to transform both the approach and delivery of social assistance in Ontario. Based on an initial review of the report, staff is cautiously optimistic with respect to the recommendations contained in the report. However, many of the recommendations lack sufficient information upon which to offer a concrete assessment at this time. Given the lack of detailed information available on many of the Commission's recommendations, staff are proposing to bring a series of reports to the Emergency and Community Services Committee that will be developed over time as more information becomes available from the province, when any of the recommendations are approved and/or implemented, and/or if municipalities are consulted with respect to implementation.

While unable to provide Council with a detailed analysis of the Commission's recommendations at this time, staff are providing Council with an overview of the report. Appendix A attached to this committee report entitled, Beginning the Dialogue, provides Council with a document that sets the context from which future Council reports on social assistance reform will be written. Appendix A includes two parts: Part One presents a discussion of how recent provincial/federal budget decisions have impacted municipal social service delivery and social assistance recipients/low incomes citizens, while Part Two presents a high level discussion of the Commission's recommendations in ten key thematic areas.

Alternatives for Consideration – see page 4

FINANCIAL / STAFFING / LEGAL IMPLICATIONS

Staff have identified in Appendix A to report CS13007, some initial implications for the City of Hamilton; however, until any of the recommendations are officially adopted by the Provincial government or more detail is provided, staff are unable identify specific financial, staffing, or legal implications at this time.

HISTORICAL BACKGROUND

1. The Commission for the Review of Social Assistance in Ontario was struck in 2010 as part of the province's 2008 Poverty Reduction Strategy.
2. The Province released Discussion Paper #1: Issues and Ideas, in June, 2011. The purpose of this document was to elicit ideas in general from the community on the following key areas:
 - Reasonable expectations and necessary supports to employment
 - Appropriate benefit structure
 - How to make social assistance rules easier to understand
 - How to make the system viable over the long term

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- An integrated Ontario position on income security.

The City of Hamilton presented its response to the Commission's first Discussion Paper at the September 21, 2011 Emergency and Community Services Committee (see CS11081).

The following themes were highlighted in the staff response:

- The need for clear and consistent communication and access: one administrator role for OW/ODSP; easier rules regarding financial dependent and spousal/cohabitation; greater incentives for earnings; simplifying self employment rules; and, increasing asset limits.
- The need for increased benefits and adequacy of rates including the cost of nutritious food; annual indexing; shelter cost based on the geographic area; transportation, telephone and child care; standardized dental care and vision care were also highlighted.
- Further, the response suggested the need for improved supports and resources, employment services to assist through the continuum of employment (pre and post); specialized supports for persons with barriers to employment; and, tools to capture employer needs and the skill sets of the unemployed or underemployed.
- Enhanced education and training: supporting more long term training and post secondary education; and,
- A more person-centered customer service approach to delivery

Based upon the feedback received by the Commission from their first Discussion Paper, the Province released Discussion Paper #2: Approaches for Reform in February 2012. In this report the Commission provided a number of specific "options" for which the Commission was seeking feedback.

The City of Hamilton presented its response to the Commission's Discussion Paper #2 at the March 19, 2012 Emergency and Community Services Committee (see CS11081 (a)). This report presented a discussion on possible key areas for improving the social assistance system. The following were the key points included in the City of Hamilton's response:

- The need for consistent assessment and case management; integrated pre- and post-employment services and supports; access to the same level of services for people with disabilities; and, strong connections with employers.
- The need for improved provincial-municipal collaboration with the municipality assuming the service manager role for employment services
- The development of a Social Assistance Rate Board to determine the appropriate rates for social assistance. Further, the response called for the development of a standardized (provincial) extended health program for all low income individuals and families which would include dental, vision care, prescriptions, diabetic and surgical supplies and assistive devices.

- It was also suggested that an income security program be created for the severely disabled.
- The establishment of a common asset limit for the social assistance program which would mirror that amount with ODSP and that higher asset levels be allowed at the beginning of the receipt of social assistance but would decrease over time.
- Moving the delivery of social assistance away from in-depth verification and re-verification to a centralized audit approach to allow for more time on case management and planning.
- The importance of adopting a person-centered customer service approach to service delivery and that the administrator role for OW/ODSP should reside with the municipality
- The potential for integration of all human services including employment, social assistance (OW/ODSP), housing and childcare at a local level
- That childrens' services such as temporary care and assistance for children with severe disabilities be removed from the current social assistance system and placed within the purview of the Ministry of Children and Youth Services.

POLICY IMPLICATIONS

If implemented, many of the recommendations in the Commission's report will result in changes to a number of OW/ODSP program directives and City of Hamilton's program policies and procedures.

RELEVANT CONSULTATION

- Directors, Employment and Income Support, Community Services Department
- Director, Benefit Eligibility Division, Community Services Department
- Director, Housing Services Division, Community Services Department
- Director, Social Development and Early Childhood Services Division, Community Services Department
- Program Manager, Employment & Income Support, Community Services Department
- Manager, Social Development and Early Childhood Services Division, Community Services Department
- The Social Assistance Reform (SAR) Working Group (Hamilton Roundtable for Poverty Reduction)
- The Hamilton Roundtable on Poverty Reduction (HRPR) Social Assistance Review Working Group has been updated on the city's approach to The Commission for the Review of Social Assistance in Ontario (CRSAO)

recommendations and agrees with the approach undertaken due to the lack of detailed information available on many of the recommendations.

ANALYSIS / RATIONALE FOR RECOMMENDATIONS

The Commission for the Review of Social Assistance in Ontario released its final report on October 24, 2012. The report contains 108 recommendations across seven areas:

1. Enabling Employment
2. Building a Better Benefit Structure
3. Strengthening Accountability
4. Acting on Income Security
5. First Nations and Social Assistance
6. Implementing Change and Early Priorities
7. Costs of Poverty and Return on Investment.

Upon an initial review of the 108 recommendations contained in the Commission's report, staff would, based on the information provided in the report, support all of the report's recommendations ***in principle***. However, many of the recommendations will require more detailed information before staff can provide Council with a more robust analysis and recommendations.

This Committee report contains two parts.

Part One presents a discussion of how municipalities and social assistance recipients and low income citizens have been impacted by decisions from recent provincial/federal budgets.

Part Two provides a high level overview of the Commission's recommendations organized into ten key thematic areas:

1. Integration of the Ontario Works (OW) and Ontario Disability Support Program (ODSP)
2. Employment Services
3. Administration – OW/ODSP
4. Administration – First Nations
5. Benefit Rate/Structure
6. Simplified Social Assistance Rules
7. Block Funding/Transferred Savings
8. Governance of Social Assistance Reform
9. Monitoring of Social Assistance Reform
10. Implementation of Social Assistance Reform

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To provide consistency in approach to the discussion of the Commission's recommendations in each of the ten key thematic areas, six filters were chosen in order to capture the overall dimensions by which the City of Hamilton could be impacted. These six criteria attempt to provide Council with an overall sense as to whether or not the Commission's recommendations will improve the quality of life for clients (improved benefit rates, simplified rules), have potential impacts on the City of Hamilton (financial, human resource, infrastructure etc.), represent integrated or systems-based approaches, and enhance accountability for the both the system users and administrators.

These six filters were:

1. Client Centered
2. Integration
3. Impact on City of Hamilton Human and Physical Infrastructure
4. Funding
5. Systems Based
6. Accountability.

Combined, Parts One and Two provide the Emergency and Community Services Committee with an initial overview of the Commission's recommendations and their complexity.

ALTERNATIVES FOR CONSIDERATION

None

CORPORATE STRATEGIC PLAN

Focus Areas: 1. Skilled, Innovative and Respectful Organization, 2. Financial Sustainability, 3. Intergovernmental Relationships, 4. Growing Our Economy, 5. Social Development, 6. Environmental Stewardship, 7. Healthy Community

Social Development

- ♦ Residents in need have access to adequate support services

Healthy Community

- ♦ Adequate access to food, water, shelter and income, safety, work, recreation and support for all (Human Services)

Financial Sustainability

- ♦ Financially Sustainable City by 2020

APPENDICES / SCHEDULES

Appendix A to Report CS13007:	Beginning the Dialogue: Responding to the Commission for the Review of Social Assistance in Ontario's Final Report Better Prospects: Transforming Social Assistance in Ontario
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Beginning the Dialogue

City of Hamilton's Response to the Commission for the Review of Social Assistance in Ontario's Final Report:

Brighter Prospects: Transforming Social Assistance in Ontario

February 2013

1.0 Introduction:

The Commission for the Review of Social Assistance in Ontario (Commission), struck in 2010 as part of the province's poverty reduction strategy, released its highly anticipated final report on social assistance reform on October 24th, 2012. The report, **Brighter Prospects: Transforming Social Assistance in Ontario**¹, completes the work of the Commission and represents potentially the most transformational review of the social assistance system in over 20 years.

In an initial review of the report's recommendations, there appear to be three themes that underpin many of the Commission's recommendations:

1. Better integrated and coordinated services at the local level will improve outcomes and reduce costs.
2. Municipalities and First Nations have better local understanding of their communities and labour market so it would make sense that the administration and delivery of both ODSP and OW be at the local level. The local understanding of the labour market also influenced their recommendation to have municipalities become partners with the Province in managing and planning employment services.
3. Municipalities can leverage connections not only to local employers, but to other programs municipalities offer such as housing and child care.

While acknowledging the important role of municipalities and First Nations in the role of transforming the social assistance system, many of the Commission's recommendations will require more time to assess in order to identify implications for the City of Hamilton. For the most part, many of the Commission's recommendations were suggested/supported by staff in previous responses to discussion papers set out by the Commission. That said, there are new ideas in the report that will require thorough

¹ <http://www.socialassistancereview.ca/final-report>

analysis and careful consideration concerning their impact on social assistance recipients and the broader system. Simply put, the report lacks enough detailed information on a number of recommendations of particular interest to the City. Further, no proposed timelines are suggested by the Commission during which the system will evolve from the current state to the totally transformed system so it is unclear when the transformation as envisioned by the Commission will take place. It is important to note that the “Brighter Prospects Report”, similar to the Drummond report (Commission on the Reform of Public Services in Ontario), presents a series of recommendations to the Provincial Government who will ultimately approve, revise, or reject the Commission’s recommendations.

Two provincial associations representing the interests of municipalities in Ontario, the Association of Municipalities Ontario (AMO) and the Ontario Municipal Social Services Association (OMSSA), are currently in the process of conducting further analysis of the recommendations in consultation with the government and municipalities. In fact, AMO and OMSSA have struck a joint working group² to review the Commission report and its implications to municipalities.

Due to the transformational nature of the model put forward in the Commission’s report, the City of Hamilton’s Community Services Department proposes to bring a series of reports to Council based on key thematic areas identified from the recommendations. This first report by the City of Hamilton: **Beginning the Dialogue**, attempts to set out contextual background from which the Commission’s recommendations will be reviewed by the City of Hamilton. Part One of this report examines the impacts of provincial and federal budget decisions on municipal social service delivery and identifies potential impacts on social assistance recipients and low income citizens. Part Two highlights ten key thematic areas identified by staff as potentially having significant impact on the City of Hamilton. It is likely that future staff

² AMO/OMSSA Social Assistance Reform Working Group.

reports to council will be focused on the key thematic areas introduced in Part Two of this report. Staff have provided these contextual pieces in order to lay the foundation for more robust discussion and analysis of the Commission's recommendations when more detailed information becomes available.

Future reports will be provided to Council when more information becomes available from the province, when any of the recommendations are approved and/or implemented, or if municipalities are consulted with respect to implementation.

The ten key thematic areas explored in Part Two are:

1. The Integration of Ontario Works (OW) and Ontario Disability Support Program (ODSP)
2. Employment Services
3. Administration – Ontario Works/Ontario Disability Support Program
4. Administration – First Nations
5. Benefit Rate/Structure
6. Simplified Social Assistance Rules
7. Block Funding/Transferred Savings
8. Governance of Social Assistance Reform
9. Monitoring of Social Assistance Reform
10. Implementation of Social Assistance Reform.

Given the limited detailed information available on many of the Commission's recommendations, Part Two presents a high level analysis of the recommendations in the key thematic areas using six criteria to focus that discussion. The six criteria to focus the discussion include: client centered, integration, impact on the City's human and

physical infrastructure, funding, systems based, and accountability. These six criteria were chosen in order to provide Council with an overall sense as to whether or not the Commission's recommendations will improve quality of life for clients (improved benefit rates, simplified rules), have potential impacts on the City of Hamilton (financial, human resource, infrastructure etc.), represent integrated or systems-based approaches, and enhance accountability for the both the system users and administrators.

2.0 Background:

The Commission for the Review of Social Assistance in Ontario was struck in 2010 as one of the strategies identified in the province's poverty reduction strategy, **Breaking the Cycle**, released in 2008.

The goal of the Commission was to:

...undertake a review of social assistance with goal of removing barriers and increasing opportunity – with a particular focus on people to move into employment from social assistance. The review will seek to better align social assistance and other key programs and initiatives, better communicate program rules and ensure that programs as a collective work to achieve the aims of increasing opportunity for the individual³.

The Commission's Vision was to develop:

A 21st century income security system that enables all Ontarians to live with dignity, participate in their communities, and contribute to a prospering economy.

To achieve that vision, the Commission identified five specific outcomes it hoped to achieve and recommend to the provincial government:

- 1. Place reasonable expectations on, and provide supports for, people who rely on social assistance with respect to active engagement in the labour market and participation in treatment and rehabilitation;***

³ Ibid, pg. 30.

- 2. Establish an appropriate benefits structure that reduces barriers and supports people's transition into, and attachment within, the labour market;**
- 3. Simplify income and asset rules to improve equity and make it easier to understand and administer social assistance;**
- 4. Ensure the long-term viability of the social assistance system; and**
- 5. Define Ontario's position vis-à-vis the federal and municipal governments as it relates to income security for Ontarians.**

The Commission undertook a community consultation process that spanned roughly fifteen months beginning in 2011 ultimately reaching over 2000 people in 11 community conversations (including Hamilton) and over 1150 written submissions. To facilitate consultation with community and key stakeholders, the Commission released two discussion papers⁴. This report, **Brighter Prospects: Transforming Social Assistance in Ontario**, represents a culmination of the work completed by the Commission and the community consultation.

The Commission sets the context for a transformed social assistance system by asserting that it must focus on “ability” rather than disability. ***“The starting point of the new system is that all social assistance recipients, including persons with disabilities should be supported to participate in the workforce to the maximum of their abilities and that income security should be guaranteed for those who cannot work”***⁵. Five key principles guided the work of the Commission:

- 1. Dignity and Respect;**
- 2. Consistency;**
- 3. Simplicity;**
- 4. Effectiveness; and,**
- 5. Accountability and Transparency.**

⁴ Discussion Paper #1: Issues and Ideas Released in June 2011 and Discussion Paper #2: Approaches to Reform released February 2012.

⁵ Brighter Prospects: Transforming Social Assistance in Ontario, Commission for the Review of Social Assistance in Ontario, page 14.

From this starting point of “ability” and using the key principles, the Commission tabled its recommendations for a new social assistance system in Ontario. The report contains 108 recommendations covering seven key topics:

- 1. Enabling employment**
- 2. Building a better benefit structure**
- 3. Strengthening accountability**
- 4. Acting on income security**
- 5. First nations and social assistance**
- 6. Implementing change and early priorities**
- 7. Costs of poverty and return on investment.**

It is important to acknowledge that although the Commission’s report is complete and offers recommendations for the consideration of the provincial government, approval and ultimately implementation, rests with the provincial government. At this time, with the provincial government in a state of “prorogation”, the report’s status is unclear.

PART 1: IMPACTS OF PROVINCIAL AND FEDERAL BUDGETS ON CITY OF HAMILTON SOCIAL SERVICES

A discussion of recent decisions made by both the provincial and federal governments in their 2012 budgets may technically lie outside of an analysis of the Commission's recommendations for social assistance reform, however, these decisions impact current/future social assistance recipients and municipalities/First Nations that deliver social assistance. These provincial/federal budget decisions reflect what is best described as a more traditional "silo-bound" thinking than a "systems based" approach to human services planning. "Silo-bound" approaches, where decisions made in one service area either contradict or make it difficult to access services in another area⁶.

Municipalities and other social and community services have picked up where the provincial/federal governments have reduced programs and/or funding under the auspices of fiscal restraint and austerity. This year's federal and provincial budgets have continued this trend leaving the City of Hamilton constrained in its ability to meet the increasing needs in the community.

3.0 2012 Provincial Budget Impacts:

3a) No Increase for Social Assistance Rates

The 2012 Provincial budget included no increase to social assistance rates. However, due to pressure applied by the opposition parties, a 1% increase in social assistance rates was eventually announced. Given that the Provincial Poverty Reduction Strategy

⁶ Human Services Integration and the 2012-2013 Ontario Budget: the Need to Move from Silo-Bound to Systems-Based Thinking, OMSSA, June 12, 2012, page 2. Ibid, page 2.

acknowledged the inadequacy of current social assistance rates and the growth of poverty in Ontario, an increase in the 2012 provincial budget had been anticipated.

3b) Ontario Child Benefit Increases Deferred

The Ontario Child Benefit (OCB) provides financial support for low-income families (whether they are working or not). Proposed provincial increases in the Ontario Child Benefit for 2013 of \$1,310 will now be deferred until 2014 with only a small increase of \$110 taking place in July 2013. The Consumer Price Index for Ontario rose .7% from 2011 to 2012 with food/shelter/education etc. costs rising 1.3% and energy costs by 2%. Delaying planned increases for OCB until 2014 will make it challenging for eligible families to continue to meet the needs of their families as the cost of living continues to rise.

3c) Discretionary Benefits Reductions

Discretionary benefits are provided on a case-by-case basis to OW/ODSP clients who have a need for supports that are not considered mandatory under the Ontario Works Act. These benefits include both health and non-health related items. Municipalities across Ontario offer a different range of items in their discretionary benefits programs depending upon local needs and priorities. In the City of Hamilton, discretionary benefits provide assistance with a range of items including: dental and vision care for adults, prosthetic appliances, orthotics, funerals/burials, cribs, layettes, car seats, utilities arrears and transportation. Prior to the changes in the 2012 Provincial budget, provincial cost-sharing for discretionary benefits was capped at \$8.75 per case/month for non-health related items and there was no cap on health related discretionary benefits.

The Provincial budget effectively capped **combined non-health and health discretionary benefits at \$10 per case/month effective July 1, 2012**. Municipalities across Ontario are in the process of reprioritizing items offered through their discretionary benefits

programs. The City of Hamilton anticipates a funding shortfall of an estimated \$3,756,517 in 2013. To comply with the new funding cap, staff presented a prioritized list of potential items that could be covered under the Provincial funding cap to its Emergency and Community Services Committee on November 1, 2012⁷. On November 14, 2012 Hamilton City Council approved a motion for one-time funding to maintain the programs' current levels until June 30, 2013.

If municipalities are no longer able to assist OW/ODSP recipients with items previously funded through discretionary benefits, clients will be forced to find alternative ways to pay for the items required, rely on other social and community services to assist, or more than likely be forced to go without. If clients are forced to "go without", there could potentially be longer term costs as health conditions potentially worsen without these interventions.

3d) Community Start-Up and Maintenance Benefit Reductions and Transfer to Housing

The Community Start-Up and Maintenance Benefit (CSUMB) was a mandatory benefit under OW/ODSP Programs that assisted individuals and families who receive social assistance to establish a new residence, prevent eviction, or maintain an existing residence. The type of items currently covered under CSUMB include: last month's rent, rent and utility arrears, moving costs, and household furnishings. Effective January 2013, this benefit was eliminated from the Ontario Works and ODSP Programs and will no longer be cost-shared by the Province. CSUMB was the safety net to support individuals in maintaining housing which is difficult when the social assistance rates for single individuals represent approximately 36% of minimum wage (less than \$8,000 per year) which itself is only 35% of the poverty line.

⁷ See: <http://www.hamilton.ca/NR/rdonlyres/EEDD14F3-951C-41ED-9C79-2A5C1606051E/0/Nov01Item41.pdf>

Each municipality may choose to provide alternative financial supports for housing similar to CSUMB as part of the new Community Homelessness Prevention Initiative. It is now a municipal decision whether to offer this type of assistance and to design the program. It is a local decision to establish eligibility criteria and the method of delivery. The benefit is no longer part of the social assistance program but instead part of the housing and homelessness system with the goal of assisting people to obtain and retain housing and assist people at risk of homelessness to remain housed.

In place of CSUMB, the City of Hamilton will provide financial supports for housing as a component of a new program called the Housing Stability Program. On November 14, 2012 City Council approved a motion for one-time funding to maintain the programs' current levels until June 30, 2013.

If funding for the Housing Stability Benefit is not maintained at the same level as previous years CSUMB expenditures, there will likely be an increase in evictions and other hardships. This in turn would increase the level of homelessness in the community and increase reliance on emergency shelters and other social services such as food banks. The impact will be felt by landlords, social housing providers and the many agencies that serve the most vulnerable in the community. The emotional and physical costs to individuals and families may be difficult to measure, but will be profound.

A recently released report from the Wellesley Institute examined the health impacts of the cancellation of the CSUMB program using a Health Equity Impact Assessment. The report noted that "by eliminating one of the few flexible and a targeted supports for people receiving social assistance, there is a risk that for those who are the poorest, who face the greatest housing insecurity, and who are at greatest risk of poor health will be disproportionately affected. The stress associated with housing insecurity

contributes to increased risk of morbidity and premature death”⁸. The Wellesley report also acknowledges the burden placed on municipalities to identify and act on local housing needs well in advance of the need to complete their local housing and homelessness plans with a 50% reduction in funding for the CSUMB program.

3e) Consolidated Homelessness Prevention Initiative (CHPI)

On July 24, 2012 the Ministry of Municipal Affairs and Housing announced the consolidation of five existing housing and homelessness programs into the new Community Homelessness Prevention Initiative (CHPI). The announcement of the new CHPI was intended to provide municipalities with the flexibility needed to design programs that meet local needs and priorities. Under this new program, municipalities will have the flexibility to use the consolidated CHPI funding in four key areas: emergency shelter solutions, housing and related supports, services and supports, and homelessness prevention. The following existing programs were consolidated under CHPI:

- Consolidated Homelessness Prevention Program
- Emergency Energy Fund
- Emergency Hostel Services
- Domiciliary Hostel Program
- Provincial Rent Bank

The CHPI allocation is a combination of base funding and needs-based funding. The allocation also included 50 per cent of provincial expenditures from the former CSUMB

⁸ **The Real Cost of Cutting the Community Start-Up and Maintenance Benefit: A Health Equity Impact Assessment**, Wellesley Institute, November 2012, pg. 20.

provided to both OW and ODSP recipients in the municipality. The 2013 CHPI allocation is \$15,493,151 for the City of Hamilton.

Municipalities have long advocated for increased flexibility in the funding for housing programs, and this new flexibility is potentially good news. Flexibility, however, came at a cost for the City of Hamilton and many municipalities across Ontario. The Provincial allocation basically covers the costs for the existing housing and homelessness programs offered in Hamilton which left a shortfall of \$7.7 million for the financial assistance for Ontario Works and ODSP clients previously provided through CSUMB.

City Council approved the transfer of \$3.35 in net levy funding previously allocated to the five existing programs to off-set the shortfall as well as additional funding from City Reserves for 2013. This assistance will help to avoid undue hardship and further pressure on the social service and housing system. It will also allow time for the municipality to plan for the delivery of the new Housing Stability Program in a measured and thoughtful way beginning 2014.

It is worth noting that the Ministry of Community and Social Services announced on December 27, 2012 one-time grant funding to support municipalities as they transition to the new consolidated CHPI. The City of Hamilton's allocation is \$3,190,278.

3f) Housing Repair Benefit Removed from Social Assistance

The Home Repair benefit was a mandatory benefit for those receiving assistance from ODSP and a discretionary benefit for those receiving assistance from OW. It covered "emergency" type repairs (e.g. furnace, hole in roof, etc.). The province reported that with the elimination of this benefit from OW/ODSP, it would be replaced with **Ontario Renovates** to assist low-income Ontarians, including social assistance recipients with the cost of necessary home repairs.

In reality, Ontario Renovates is a new name for the Renovation Retrofit Assistance Program (RRAP) which has been offered in Hamilton for many years. It is now a component of the Investment in Affordable Housing Program which is a federal/provincial housing initiative. The Ontario Renovates budget was set and approved by City Council prior to the provincial announcement that the Housing Repair Benefit would be eliminated from social assistance. The number of applications for RRAP funding historically outweighs the available funding. Additional applications from Ontario Works and ODSP households will put further pressure on the program and will not meet the needs of homeowners who rely on social assistance. Approximately \$126,000 was issued in financial assistance for home repairs for Ontario Works and ODSP households in 2011. If the funding is not available for emergency home repairs, it will create health and safety issues for the homeowners and possible loss of their homes.

4.0 2012 Federal Budget Impacts:

4a) Employment Insurance Changes

The 2012 Federal budget implemented a number of changes to the Employment Insurance (EI) program including:

- 1.** Calculation of EI benefit amount based on the highest weeks of earnings over the preceding year
- 2.** Introduction of legislation to strengthen and clarify what is required of claimants who are receiving regular EI i.e. suitable employment and reasonable job search
- 3.** Introduce revisions to the Working While on Claim EI pilot

Determining eligibility for the EI program can be an extremely complex endeavor. The recent change in EI benefit amount calculation simplifies the calculation to a degree by basing the EI benefit on the highest weeks of earning over the preceding year using a range of 14 to 22 weeks depending upon the unemployment rate in an EI region.

Depending upon the EI region's unemployment rate, there are different qualifying hours for regular benefits and a minimum and maximum number of weeks payable for regular benefits. For someone applying for EI in the City of Hamilton from November 4, 2012 to December 8, 2012 for example (Region Code 28-Unemployment Rate of 6.2%), they would require 665 hours to qualify for regular benefits and could anticipate a minimum of 15 weeks of benefits to a maximum of 38 weeks. The Caledon Institute emphasizes that this linking of EI benefit rate calculation to unemployment rate has been long acknowledged as obsolete and unfair. "In whatever way the weeks are calculated, this is one more measure favouring so-called high unemployment regions and maintaining, if not exaggerating, the current regional imbalances in Employment Insurance"⁹

Although the requirement to accept suitable employment and conduct a reasonable job search is not new for EI claimants, the federal government has provided greater detail as to criteria and expectations. With changes announced in the 2012 federal budget, four key criteria will be used to identify suitable work: personal circumstances, working conditions, hours of work and commuting time. These four considerations are applicable for all EI claimants. There are two other criteria: type of work and wages that will vary depending upon the worker category (long-tenured, frequent claimant, or occasional claimant)¹⁰. With respect to a reasonable job search, EI applicants can now expect to be able to identify all job search and employment related activities, demonstrate that their intensity of job search effort is aligned with the number of job opportunities available in their community, demonstrate that job search efforts are targeted to "suitable" employment, and be able to provide tangible evidence of all job search activities and outcomes. While greater clarity with respect to both suitable

⁹ Battle, Torjman, and Mendelson, The No-Budge Budget, Caledon Institute of Social Policy, April 2012, pg 29.

¹⁰ Discretion as to usual employment and % of wage range acceptable to EI with respect to suitable employment will vary in the range of 70-90% depending upon your worker category: occasional claimant , frequent claimant or long-tenured claimant.

employment and reasonable job search has been provided by the federal government, it is unclear how strictly these new criteria will be enforced potentially impacting EI beneficiaries' ongoing eligibility.

The Working While on Claim Pilot Project (WWCPP) will also have changes as a result of the 2012 federal budget. Prior to the changes announced in 2012, eligible claimants in the WWCPP were entitled to earn through employment \$75 per week or 50% of their weekly benefits (whichever was higher) without having any EI benefits reduced. Any employment income earned above that amount would be deducted dollar for dollar from their EI benefits. The change proposed in the federal budget is that once the two week waiting period to receive EI benefits is served, employment earnings are deducted at a rate of 50% of each dollar earned up to the point where a client's earnings equal 90% of the weekly insured earnings used to establish their EI benefit rate. After this 90% threshold is reached, employment earnings are deducted dollar for dollar from their EI benefits.

Although intended to provide an incentive to work while in receipt of EI, the recent changes to the WWCPP are confusing. A Caledon report reviewing the 2012 federal budget, analyses two specific cases in order to determine if the new changes are beneficial to those on the WWCPP. Using two different weekly incomes, the report found that the new rules under WWCPP benefit those who are able to earn a greater amount of income per week when compared to their EI benefits with the new rules and those who earn smaller amounts in income per week may be worse off¹¹. Considering that women with children may need to pay for childcare or eldercare to return to the workplace, the costs to do so might outweigh the advantages of working while on claim¹².

¹¹ Battle, Torjman, and Mendelson, The No-Budget Budget, Caledon Institute of Social Policy, April 2012, pg 26.

¹² The Federal Budget and Women, Canadian Centre for Policy Alternatives, May 2, 2012.

The new measures announced for EI in the 2012 federal budget do not address an inherent problem with the EI program overall. Access to EI is an on-going issue for both women and men. In 2011, only 37% of unemployed women were able to access regular benefits compared to 45% of men¹³. With access to fewer permanent full-time/part time jobs and an increase in temporary, contract, and seasonal work, the ability of both men and women to accumulate enough eligible hours to apply for EI overall is affected. In particular, women's more irregular work patterns (part time employment, fewer work hours per week, and intermittent labour force participation) means that if they can qualify, it takes them longer to do so.

4b) Old Age Security Changes

The federal budget announced changes to Old Age Security (OAS) beginning in April 2023, which will delay OAS benefits until the age of 67. Those applicants who defer the start of their OAS benefits for up to 5 years will receive higher benefits once claimed. What this change means is that those who are currently 53 years of age and under will have to wait an extra two years to begin to collect OAS.

By increasing the eligibility age of OAS to 67, the federal government has also, as a result, changed the eligibility age criteria for the Guaranteed Income Supplement (GIS) to 67 for low income seniors. The changes in OAS/GIS will disproportionately affect seniors with the lowest incomes. Low income seniors with few options will continue to live in poverty relying on the social safety net. For women between the ages of 65-69, the OAS/GIS comprise roughly 38% of their total income whereas for men in this target group it is 26%.

¹³ The Federal Budget and Women, Canadian Centre for Policy Alternatives, May 2, 2012.

4c) Interim Federal Health Program Funding Reductions

Cuts to the Interim Federal Health Program (IFHP) funded by Citizenship and Immigration Canada were announced in June 2012. The IFHP provided temporary health insurance to refugees, protected persons and refugee claimants in Canada who are not covered by a provincial or territorial health insurance plan. Prior to June 30, 2012, IFHP included basic health care services and benefits such as pharmacy coverage, dental care, vision care, ambulance services and devices to assist with mobility for eligible refugees. Changes made to the IFHP as of June 30, 2012, impact the level of health services available to particular categories of refugees. Specifically, refugee claimants who have withdrawn/abandoned their claim or who have been found not eligible and applicants for a Pre-Removal Risk Assessment who have not made a refugee claim are no longer eligible for any health care coverage.

A detailed report highlighting the specific impacts by refugee target group was presented to the September 19, 2012 General Issues Committee for the City of Hamilton¹⁴. The report highlighted the impact on the City of Hamilton's Public Health Services including dental services, mental health, immunization, sexual health, nutrition counseling, prenatal health and child health development. Aside from the impacts to the City's Public Health Services, local community health centres, mental health services etc. will experience greater pressure to fund services no longer covered by IFHP.

4d) Abolition of the National Council on Welfare

As of 2012, the federal government will no longer fund the National Council on Welfare (NCW). The National Council on Welfare was established in 1969 as a citizens' advisory body to the federal government via the Minister of Social Development. Its mandate

¹⁴ See http://www.hamilton.ca/NR/rdonlyres/C48D72B8-D7E6-4781-B6FC-D212C2C76503/0/Sep19EDRMS_n352634_v1_8_2_BOH12023_Health_Impacts_of_Reduci.pdf

was to advise the Minister on the needs and problems of low-income Canadians and on social and related programs and policies which affect their welfare. The Council published and made available, free of charge, reports on poverty and social policy in Canada including the topics of income security programs, poverty lines and statistics, social services, taxation, welfare reform, legal aid, retirement income system, and labour market issues. Two key reports published by the NCW included ***Welfare Incomes*** and the ***Poverty Profile***. Data from these two key reports are used extensively by policy analysts, community grassroots organizations, advocacy groups, and other levels of government including municipalities who use this important information to make evidence based local decisions. Aside from the potential loss of data, the loss of funding for the NWC also means the loss of the only federally appointed citizen advisory committee providing citizen input into federal policy development for low income citizens.

4e) Statistics Canada Long Form Census:

Although not part of the 2012 Federal budget, the controversial decision of the federal government on June 26th 2010, to discontinue the mandatory long-form Census and replace it with the voluntary National Household Survey (NHS) sparked a significant reaction from a wide range of social services/public health organizations, economic organizations, community developers, policy analysts, researchers and municipal governments across Canada¹⁵. Data from the Census long form has provided the City of Hamilton and local decision-makers with detailed information of our population at the national, provincial, regional, community and neighbourhood level. This information has been fundamental to informing policy and program planning for a range of human services and key social issues related to employment and income, education, immigration, ethnicity, etc.

¹⁵ See the City of Hamilton's response: http://www.hamilton.ca/NR/rdonlyres/9907D216-C05F-4890-81C2-47EB16FB7CB6/0/Feb14EDRMS_n130971_v1_8_4_CS11021_Census_Long_Form.pdf

It is unlikely that data from the new NHS will be able to provide the same robust information that municipalities relied upon to conduct trend analysis and detailed population profiles at small geographical areas at present. There is significant concern that data from the NHS will not be representative of diverse communities and the ability to compare and benchmark with provincial and national statistics will be lost.

Without the Census long form data, it will be difficult for our local government to monitor the changing needs of the local population, make sound decisions, and identify local priority needs. The decision to discontinue the Census long form will severely limit the City of Hamilton's ability to effectively plan programs and services, meet growth management targets, appropriately address legislative requirements and responsibly account for the local, provincial and federal funding received to meet the needs of citizens. The City of Hamilton's ability to effectively plan and monitor services targeted to respond to the needs of under-served communities and assist the vulnerable groups that rely most on local level programs and services will be hindered.

4f) Elimination of Other Key Statistical Surveys:

Aside from the significant loss of the long-form census, a number of other key statistical surveys have been eliminated:

1. **Participation and Activity Limitation Survey (PALS):** contained the major source of national information on persons with disabilities and the supports required to help them live independently. The federal government eliminated this survey and proposed to replace it with a new strategy for data collection for persons with disabilities. With the loss of this survey, it is impossible to accurately track or assess changes in this population over time. It is worth noting that to date, disability groups and others are still waiting for the newly designed tool.

2. **Social Security Statistics: Canada and Province:** contained a wide range of information on federal, provincial/territorial and municipal government programs.
3. **Survey of Labour and Income Dynamics (SLID):** gathered information on changes experienced by people over time including movement in and out of poverty.

4g) What was Missing from the 2012 Federal Budget?

Food Banks Canada commented in their response to the 2012 federal budget that, “it continues a trend toward the federal government distancing itself from social problems, with a consequent expansion of the role of provinces, charities, and non-profits in issues such as poverty, household food insecurity and homelessness”¹⁶. The Federation of Canadian Municipalities also commented on the lack of a federal government response to address issues in the Canadian rental housing market. Municipalities were hoping to see some commitment to a federal housing strategy, federal poverty strategy, and a national child care strategy.

5.0 Summing Up: What is the Cost of Growing Income Inequality?

5a) Personal and Community Costs:

Data analyzed by the Centre for the Study of Living Standards demonstrates that from 1981 to 2010 the poverty rate fell in five provinces across Canada while the poverty rate grew for the other five including Ontario which grew 3.7 percentage points ¹⁷. Additionally, over the same time period, “Ontario experienced the largest change in

¹⁶ **Food Banks Canada’s Reaction to the 2012 Federal Budget,** Food Banks Canada, April 2012, p.2.

¹⁷ **I Falling Behind: Ontario’s Backslide into Widening Inequality, Growing Poverty and Cuts to Social Programs,** A report of the Ontario Common Front, 2012.

income inequality, as measured by the Gini coefficient, in percentage terms at 17.2%”¹⁸. Conveyed in other terms, the widest income disparities between the top 20% and the bottom 20% income groups across Canada are found in British Columbia and Ontario¹⁹.

In her 2007 study, *Ontario’s Growing Gap: Time for Leadership*, Armine Yalnizyan, Senior Economist for the Canadian Centre for Policy Alternatives discusses Ontario’s growing income inequality. “Fully 40% of Ontario’s families have seen almost no income gains or, worse, actual income losses compared to their predecessors 30 years ago.”²⁰ Poverty “intensification” examines both poverty rates and poverty inequality and when combined, Ontario has seen the highest intensification of poverty from 1981 to 2012 across Canada²¹. For those receiving social assistance, living within this climate of growing income inequality, the reality is that social assistance benefits are lower in real dollars now than they were in 1986 and the trend is that “social assistance rates will continue to lose ground, worsening Ontario’s poverty rate”²².

A recently released report examining the impacts of inequality²³, warns of the risks of growing income inequality in Canada noting that extreme income inequality has not only reversed past gains aimed at greater equality, but it also threatens our ability to respond creatively and effectively to major new economic, social, and environmental

¹⁸ Ibid, page 16.

¹⁹ Ibid, page 13.

²⁰ Armine Yalnizyan, Canadian Centre for Policy Alternatives. *Ontario’s Growing Gap: Time for Leadership* (2007), 3.

²¹ Ibid, page 13.

²² **Falling Behind: Ontario’s Backslide into Widening Inequality, Growing Poverty and Cuts to Social Programs.** A report of the Ontario Common Front, 2012, page 11.

²³ **Towards a More Equal Canada: A Report on Canada’s Economic & Social Inequality.** Broadbent Institute, October 2012.

challenges”²⁴. It also found that countries with a more equitable distribution of income, did better with respect to level of trust, life expectancy, incidence of mental illness, infant mortality, obesity rates, children’s educational performance, homicide rates and levels of crime²⁵.

5b) Publicly Funded Social Programs and the Non-Profit Sector Costs:

In Canada, citizens have traditionally benefited from access to a wide range of publicly funded social programs. However, under the mantra of containing budget deficits in the 1990’s, publicly funded social program expenditures were reduced at both the provincial and federal levels. For Ontarians this trend has continued since the 1990’s and for the 2011-2012 fiscal year, “Ontario now funds all of our programs and services – from health care to education, from justice to disability benefits – less than anywhere else in Canada”²⁶. The result of these reduced investments in publicly funded social programs is new user fees, increased wait times, reduced access to social programs, increases to municipal property taxes and growing inequity for low income citizens including social assistance recipients²⁷.

In response to reductions in publicly funded social programs, the non-profit sector has been left to deal with increased need for its programs, but with less funding to deliver them. As a result, the sector has experienced growth in service users, but decreases in the wages of its employees, declining full time employment with a rise in part

²⁴ Ibid, pg. 20.

²⁵ Ibid, pg. 6.

²⁶ **Falling Behind: Ontario’s Backslide into Widening Inequality, Growing Poverty and Cuts to Social Programs,** A report of the Ontario Common Front, 2012, pg. 31.

²⁷ Ibid, pg. 40.

time/contract work, reductions in worker benefits /pensions, reductions in administrative support, and more staff efforts being directed towards fundraising²⁸.

Advocacy groups that often represent the interests of social assistance recipients and low income citizens have also been impacted by funding cuts. These cuts mean that collectively over time, there are fewer avenues by which the interests of the most vulnerable can be heard. The past funding cuts to the Status of Women provide one example of this trend. Although funding for the Status of Women Canada was not entirely cut and still has a presence, the organization received a significant funding reduction from the federal government in 2006. The funding reduction was so significant that 12 of their 16 offices were forced to close and the organization's mandate changed to exclude work on gender equality, political justice and all advocacy, policy research and lobbying.

5c) Municipal Costs:

Municipal social service programs and social assistance recipients have also been impacted by provincial/federal budget decisions from the 1990's, particularly the reduction of social assistance rates in 1995 by 21.6% by the province. Using often creative approaches, municipalities have developed programs designed to alleviate the impacts of inadequate social assistance rates. The City of Hamilton for example developed a 100% Municipal funded low income discretionary benefits program to assist persons with low incomes (including seniors) with health related benefits as they were previously funded under General Welfare Assistance but removed when Ontario Works Act was proclaimed, a Utilities Arrears Program, an Affordable Transit Pass Program, discretionary benefits such as child related (car seats and cribs), Affordable Recreation Pass, reinvestment of the National Child Benefit (NCB), support for Food Banks and the Housing Allowance Program. The reality is, however, that recent

²⁸ Ibid, pg. 37.

federal/provincial policy decisions and changes have meant that municipalities increasingly lack the resources to continue to fill in the gaps.

This increasing local pressure to fund municipal social services is a direct result of the “downloading” of costs to the municipalities from the 1990’s through the Local Service Realignment (LSR). Since the 1990’s, the City of Hamilton, and other municipalities, became financially responsible for funding a number of programs: including the delivery and funding of social assistance, child care, land ambulance, social housing, public health and court security. As a result of the recent Provincial-Municipal Fiscal and Service Delivery Review in 2008, the province began “uploading” the costs of the OW/ODSP programs (Court Administration was also part of the upload program and Public Health funding was restored to pre-LSR levels). While many municipalities in Ontario, particularly in the GTA, have experienced significant benefits from the upload, the City of Hamilton is not projected to realize a benefit until at least 2013²⁹ (this excludes the additional costs from Social Housing incurred since 1998).

5d) Commission’s Report on Social Assistance Reform:

The Commission’s report on social assistance reform presents a bold new vision designed to transform how social assistance benefits are determined and how the program is delivered overall. The 108 recommendations in the Commission’s report will require additional information from the province in order for municipalities to determine whether or not this new proposed model is truly transformative benefiting both social assistance recipients and municipalities/First Nations who would be responsible to deliver it.

Implementing this new model of social assistance reform put forward in the Commission’s report will require changes outside of the social assistance system. Some examples of these changes include, but are not limited to: the development of a

²⁹ See: City of Hamilton report (FCS11062)

disability/children's/special diet benefit outside of social assistance likely with other provincial ministries, enhancing service agreements between provincial/federal ministries to reduce red tape with respect to the submission requirements by social assistance recipients, better linkages with federal income security programs, etc. It is this systems based approach that appears to underlie the new model for social assistance reform that is encouraging. In the current economic context of economic restraint and austerity at both the provincial/federal levels of government, the future of the Commission's recommendations remains unclear. "Ontario's budgets for the last fifteen years have repeatedly prioritized tax cuts while casting concomitant cuts to social programs as necessities rather than choices"³⁰

Even if the Commission's model were to be fully implemented tomorrow, it is only one piece of the very complex puzzle of income inequality. Without significant investments in federal/provincial income support programs, stable employment that pays a living wage and provides benefits, increased investment in public programs, affordable housing and child care and a review of the current federal/provincial taxation system³¹, income inequality will not be addressed.

6.0 Conclusion:

Municipalities provide many services directly to citizens in the community and as a result experience first-hand the impacts of years of silo-based provincial/federal budget decisions. Many of those served by municipalities are seeing that in today's economic climate their quality of life is being eroded by growing income inequality with the most vulnerable struggling to survive with inadequate social assistance benefits.

³⁰ **Falling Behind: Ontario's Backslide into Widening Inequality, Growing Poverty and Cuts to Social Programs,** A report of the Ontario Common Front, 2012, pg. 47

³¹ **Towards a More Equal Canada: A Report on Canada's Economic & Social Inequality,** Broadbent Institute, October 2012 pages 18-22.

Part One of this report sought to demonstrate how decisions made in provincial/federal budgets directly impact municipalities and their residents. The reality is that municipalities, although willing, are unable to address issues related to growing income inequality on their own. Leadership is required at the federal government in terms of a national poverty strategy, an affordable housing strategy, and a national child care strategy.

The Commission's report presents an opportunity for the development of a transformational model to address the many short comings of social assistance in Ontario. It also acknowledges that reforming social assistance alone will not adequately address the impacts of growing income inequality in Ontario. Many of Commission's recommendations acknowledge that change is required across many provincial ministries, and partnerships with the federal government to address income inequality across Canada. If the Province intends to live up to the commitments made in its Poverty Reduction Strategy, full implementation of the Commission's recommendations would be an important step.

PART TWO: COMMISSION RECOMMENDATIONS BY THEME AREA

This section of the report provides a high level analysis of the 108 recommendations contained in the Commission's report on social assistance reform. Although the City of Hamilton staff supports the recommendations contained in the Commission's report *in principle*, the lack of detailed information from the Commission/province makes it difficult to provide a robust analysis of many of the recommendations. Rather, the Commission's recommendations have been sorted into ten key thematic areas and prioritized in terms of their perceived potential impacts to the City of Hamilton.

The ten thematic areas that will be discussed in this section of the report are:

1. The Integration of Ontario Works and Ontario Disability Support Program
2. Employment Services
3. Administration – Ontario Works/Ontario Disability Support Program
4. Administration – First Nations
5. Benefit Rate/Structure
6. Simplified Social Assistance Rules
7. Block Funding/Transferred Savings
8. Governance of Social Assistance Reform
9. Monitoring of Social Assistance Reform
10. Implementation of Social Assistance Reform.

In each theme area a synopsis of the Commission's recommendations is provided. To give context to the recommendations in the thematic area, a standard set of six key criteria³² act as a set of filters through which a discussion of the recommendations is presented. These six filters were chosen in order to capture the dimensions by which the Commission's recommendations could impact both the client as user of the social assistance system and the City of Hamilton as administrator could be impacted by the Commission's recommendations. The six criteria are: client centered, integration, impact on the City of Hamilton (human and physical infrastructure), funding, systems based, and accountability.

Combined, both parts of this report provide a foundation upon which the City of Hamilton can begin a dialogue on social assistance reform. Working collaboratively with many key stakeholders in the community, City Council, and both OMSSA and AMO, that dialogue will be one of the most significant ones on social assistance reform taking place not only in the City of Hamilton, but municipalities across Ontario.

THEME 1: INTEGRATION – ONTARIO WORKS/ONTARIO DISABILITY SUPPORT PROGRAM

Synopsis of Commission Recommendations:

- Integrate the OW and ODSP programs (17)³³
- Municipalities /First Nations to deliver the newly integrated program (18)
- The province to review models for job security for staff within the social assistance system during the transition (19)

³² Schedule A contains a list of the six key criteria used as well as some of the guiding questions in each criteria considered.

³³ The numbers in brackets refer to the actual recommendation number in the Commission's report.

Criteria	Theme 1: Discussion
Client Centered	• One integrated social assistance system will streamline both access, eligibility, and referrals for both target groups • Individualized supports (depending upon what the municipality can offer) will benefit clients
Integration	• Municipalities/First Nations are identified to deliver the new integrated social assistance program in recognition of the ability of local municipalities/First Nations to link clients to other municipal services such as housing, child care, employment services etc.
Impact on City of Hamilton Human and Physical Infrastructure	• Based on the City of Hamilton’s experience when the Family Benefit Allowance and General Welfare Programs integrated in the 1990’s, it will be important to know whether the province intends to provide one-time costs during the implementation phase • Delivering an integrated program will have significant impacts on City staffing and infrastructure. At this time it is unclear what will be funded by the province as part of this integration
Funding	• The City will need to confirm the exact funding formulas for on-going funding for the delivery of an integrated program.
Systems Based	• The Commission acknowledges that integrating both OW and ODSP into a single social assistance program will improve access to consistent support for clients beginning right at their point of entry into the system. The Commission’s recommendations eliminate the current differences in approach between OW (short term emergency assistance) and ODSP (longer term support for persons with disabilities) by putting the focus on “ability and pathways to employment” for all social assistance recipients. Identifying municipalities/First Nations to deliver the integrated program acknowledges the important role that local service delivery can have in ensuring access to other programs required by OW/ODSP outside of social assistance
Accountability	• Pending the conditions under which funding is received; there will potentially be greater transparency in a streamlined social assistance system.

THEME 2: EMPLOYMENT SERVICES

Synopsis of Commission Recommendations:

- Persons with disabilities receiving social assistance receive equitable access to employment services and other supports previously available for only able bodied recipients as well as specialized disability supports (1)
- A range of integrated high quality pre and post-employment support programs be available (2)
- A “distance from the labour market” approach be used both in social assistance and Participation Agreements be replaced with Pathways to Employment Plans for recipients identifying employment goals, planned activities and supports required (7,8)
- Introduce a new range of supports for administrators and case managers to gain experience working with persons with disabilities – no penalty in the short term for persons with disabilities failing to meet the commitment in their plans (11)
- Introduce a new range of supports for administrators and case managers to gain experience working with persons with disabilities – no penalty in the short term for persons with disabilities failing to meet the commitment in their plans (11)
- Municipalities /First Nations maintain responsibility for employment services for social assistance recipients and integrate employment with other human services (20)
- Revise eligibility criteria for Employment Ontario programs (where not restricted) for social assistance recipients (21)
- Expand Employment Ontario locations where municipalities express an interest (22)
- Municipalities and the province be full partners in planning and managing employment services (23)
- Province to define the outcomes of employment services and supports to ensure the outcome is sustainable employment (68)

- Contracts with any third party deliverers of employment services include clear outcomes and targets and performance based funding (71)

Criteria	Theme 2: Discussion
Client Centered	• It appears that clients will have access to a range of “high” quality pre and post-employment supports tailored to individual needs. What is unclear is what will be included in the pre and post supports and whether they will cover a full range of barriers to employment including mental health, addiction services, and child care • For persons with disabilities, this shift to a Pathways to Employment Plan may generate fear and anxiety so there has to be some assurance that there will be no financial penalties for fulfilling the goals as set out in the plans
Integration	• A “distance from the labour market”³⁴ approach is proposed by the Commission and that this concept be used for both social assistance and provincial employment and training. Assuming this approach is being proposed to address “barriers” to employment and acknowledges that some clients may be more employment ready than others, it is unclear how this concept will be implemented
Impact on City of Hamilton Human and Physical Infrastructure	• Unknown at this time
Funding	• The Commission report states that the pre and post-employment supports and employment services provided will be funded via a “block” fund based on current funding levels. Although the discretion provided to municipalities will be welcome, current funding levels do not allow municipalities to

³⁴ This approach is being used in the City of Toronto. They use this term to determine the level of supports people need and then respond to them. The range includes intensive services to overcome multiple issues affecting employability for people who are “distant” from the labour market and few interventions to become job ready for those “closer” to the labour market

Criteria	Theme 2: Discussion
	provide the range of employment services and supports required and as we have seen in with the CHPI program, municipalities gained flexibility with reduced funding.
Systems Based	• The Commission recognizes the need to integrate employment services with other human services and recommends that municipalities and First Nations be responsible for employment services for social assistance recipients • As barriers are identified for clients with respect to their “distance from the labour market”, there needs to be additional investments in other municipal services that might be required to support clients to achieve their goals, i.e. housing, child care, transportation, etc.
Accountability	• The province has been asked to define outcomes for employment services and supports to ensure clients find their way to sustainable employment. Municipalities need to be consulted as these employment outcomes are defined. • The requirement that contracts between municipalities and third parties identify clear targets and outcomes will assist municipalities in ensuring that clients receiving service from third parties achieve their employment goals

THEME 3: ADMINISTRATION—ONTARIO WORKS/ONTARIO DISABILITY SUPPORT PROGRAM

Synopsis of Commission Recommendations:

- Hire social assistance recipients as peer navigators (12)
- Transfer Temporary Care Assistance and Assistance for Children with Severe Disabilities to Ministry of Child and Youth Services (46)
- Make available Family Support Workers to help social assistance recipients who wish to pursue child support (60)
- Service agreements between municipalities and the province define roles and responsibilities and establish outcomes and standards for the dissemination of information on best practices to achieve targets (80)

- Municipalities to identify a senior official to be the clear point of contact for the proposed Provincial Commissioner (81)
- Until the Eligibility Verification Process is fully implemented move to a risk-based approach based on a risk profile of recipients (86)
- The proposed Provincial Commissioner consult with municipalities to develop an overall risk management plan for social assistance including risk level and continuous review (87)
- Address the backlog of medical reviews for ODSP (88)
- Adopt the exception-based reporting model currently used in ODSP so all social assistance recipients are only to report when there is a change in their income (90)
- Allow social assistance recipients to do their reporting online (91)

Criteria	Theme 3: Discussion
Client Centered	• Hiring social assistance recipients as peer navigators would provide an opportunity for those hired to gain employment experience • Pursuing child care support can be a daunting task for clients so the recommendation that Family Support Workers be available to support clients will be helpful. The City of Hamilton OW already has such workers in place; however, ODSP does not have this service available. • The move to a more risk based approach in the Eligibility Review Process, reduction in the paperwork required for on-going eligibility, exception based reporting and access to online reporting would be welcome by clients
Integration	• Unknown at this time
Impact on City of Hamilton Human and Physical Infrastructure	• It is unclear how hiring social assistance recipients as peer navigators would be handled within current HR policies
Funding	• It is unclear if the province will be providing additional funding so municipalities can hire social assistance recipients as peer navigators

Criteria	Theme 3: Discussion
Systems Based	• The transfer to the province of the Temporary Care Assistance and Assistance with Severe Disabilities aligns the programs with the ministry's mandate and these clients can be better served as a result • Revising the information sharing agreements amongst other ministries etc. may assist in reducing administrative time
Accountability	• Revising service agreements between the municipalities and the Province to include clearly defined roles and responsibilities will enhance accountability in social assistance • The City's General Manager for the Community Services Department is recognized as the senior official responsible for social assistance and would act as our contact with the Provincial Commissioner. • Developing a risk management plan for social assistance will enhance accountability and allow administrators to focus resources better

THEME 4: ADMINISTRATION – FIRST NATIONS

Synopsis of Commission Recommendations:

- First Nations will define employment appropriate activities for social assistance recipients consistent with provincial objectives (9)
- Build capacity with First Nations administrators to provide employment assistance (24)
- Build capacity with First Nations administrators to deliver the newly integrated social assistance program and increase access to medical assessments (25)
- Allow First Nations to determine appropriate asset rules (65)
- Explore implications of social assistance reform for implications from the 1965 Indian Welfare Agreement (99)
- Initiate tripartite discussion to explore a greater role for First Nations to design and manage the social assistance system in their communities (100)

Criteria	Theme 4: Discussion
Client Centered	The Commission acknowledges the unique circumstances faced by First Nation social assistance recipients and these recommendations reflect and demonstrate a commitment to ensure cultural sensitivity and autonomy of First Nations is considered
Integration	Relationships are already in place with agencies that serve urban Aboriginals in the City of Hamilton
Impact on City of Hamilton Human and Physical Infrastructure	Not Applicable
Funding	Not Applicable
Systems Based	Not Applicable
Accountability	Not Applicable

THEME 5: BENEFIT RATE/STRUCTURE

Synopsis of Commission Recommendations:

- On-going eligibility for social assistance recipients be linked to their Pathways to Employment Plans within the context of their employment barriers (10)
- Replace current benefit structure with one that has a standard rate for all adults and a disability/children's supplement (26)

- The province to adopt a rational methodology to provide the information required to set social assistance rates that will address adequacy (27)
- Develop a new Basic Measure of Adequacy (BMA) (28)
- The standard rate should be initially set at \$100 per month over the current rate for single adults (32)
- Persons on social assistance living with another adult (regardless of relationship) receive a modified rate equivalent to 86% of the standard rate (34)
- If a housing benefit is introduced it should be available for all low income persons (54)
- Eliminate the use of rent scales for social assistance recipients in rent geared to income housing (66)
- Encourage the federal government to provide a supplement for those waiting determination of eligibility for Employment Insurance or Canada Pension Plan (98)
- Grandfather social assistance who might be negatively impacted by changes to the benefit rate/structure as proposed (103)

Benefit Rate Structure: Disability

- Introduce a new disability benefit outside of social assistance (38)
- Persons applying for or receiving social assistance who meet the current definition of disability used in ODSP receive the disability supplement (39)
- The initial value of the disability supplement be determined to ensure that the standard rate and disability supplement is equivalent to the maximum rate for a single renter on ODSP (40)
- Until a disability supplement is introduced, persons with disabilities be allowed to retain a portion of the disability supplement currently received through social assistance (41)
- Funds from the Work-Related Benefit (ODSP) also be redirected to fund benefit structure improvements (106)

Benefit Rate Structure: Children

- All families with children to receive the children's supplement (43)
- All sole support parents receiving social assistance receive the children's supplement (44)
- The value of the children's supplement be determined in consideration of the standard rate and the Ontario Child Benefit so that the net result is not a decrease in assistance for sole support parents on Ontario Works (45)

Benefit Rate Structure: Special Diet

- Nutritional supplements for unintentional weight loss to be provided by the Ministry of Health and Long Term Care using funding currently provided for these supplements. Any funds remaining in the special diet be used to help fund the standard rate to improve adequacy (50)

Benefit Rate Structure: Extended Health Benefits

- Examine ways to make prescription drugs, dental and other health benefits available to all low income Ontarians and that this benefit be outside of social assistance (47)
- Initially, harmonize health-related special benefits such as adult dental and provide to all social assistance recipients (48)
- In the long term the Ministry of Health and Long Term Care be responsible for all health-related special benefits for those on social assistance (49)

Criteria	Theme 5: Discussion
Client Centered	• The benefit rate structure proposed with a standard rate and supplement for disability and children (when fully implemented) will increase benefits for social assistance recipients • The introduction of Basic Measure of Adequacy and the expectation that a rational methodology based on evidence will ensure that social assistance rates will potentially provide more adequate income support • A housing benefit available for all low income persons will potentially provide greater housing stability • The assurance that no one will be worse off by any proposed changes to benefit rates/structure (including the disability and

	children's supplement) by grandfathering current recipients will alleviate anxiety with respect to loss of social assistance benefits • Nutritional supplements will be retained for those with unintentional weight loss • For those on ODSP, the loss of the Work-Related Benefit may be initially a concern, but these funds are to be reinvested in the benefit structure specifically in the disability supplement so in principle ODSP clients would not be negatively affected • Harmonized extended health care benefits for both OW/ODSP recipients would create equity for all social assistance recipients. There are currently differences between OW and ODSP with respect to eligibility for extended health benefits, levels of coverage etc.
Integration	• Whether these recommendations are consistent with new Affordable Long Term Housing Strategy needs to be determined
Impact on City of Hamilton Human and Physical Infrastructure	• If fully implemented, case managers should be spending less administrative time calculating benefits
Funding	• While the Commission report alludes to savings from the integration of OW/ODSP as one source of funding for the \$100 increase and the new standard rate, it is unclear how the new benefit rates will be sustained • It is unclear how these changes be addressed by the Provincial Municipal Fiscal Service Delivery Review • Since the disability and children's benefit will lie outside of social assistance and potentially not administered by the municipality, there should be no funding impact for the City for these specific benefits
Systems Based	• The recommendation for a supplement for those pending EI or CPP would save administrative time for case managers and issues related to overpayments/recoveries when those on social assistance eventually receive EI or CPP benefits
Accountability	• Unknown at the time

THEME 6: SIMPLIFIED SOCIAL ASSISTANCE RULES

Synopsis of Commission Recommendations:

- Allow social assistance recipients to earn an additional \$200 per month in employment earnings without affecting their benefits (33)
- Adults who either meet the definition of disability or adults who live with their parents on social assistance be deemed financially independent and able to apply for social assistance if eligible (35)
- Adults without disabilities who live with parents not in receipt of social assistance continue to be required to meet a test of financial independence to be eligible for social assistance (36)
- Definition of a spousal relationship be changed to one year of living together as a couple consistent with the Income Tax Act (55)
- Child support payments received by social assistance recipients be treated as earned income (a 50% earnings exemption as opposed to the current 100% (58)
- Social assistance recipients be allowed to choose whether or not to pursue child support (59)
- Harmonize liquid asset rules for all social assistance recipients to \$5,000 for singles and \$7,500 for a couple (61)
- The province to consider raising the asset limits if the province is able to assess whether this increase has had an impact on caseload growth or a client's ability to exit social assistance (62)
- Introduce a total allowable exemption for RRSP, RESP, Individual Development Accounts and other long-term savings to a maximum of \$60,000 in determining eligibility for social assistance (63)
- Exempt all primary vehicles from the calculation of assets for all social assistance recipients (64)

Criteria

Theme 6: Discussion

Criteria	Theme 6: Discussion
Client Centered	- Some of the rule changes proposed by the Commission will result in social assistance recipients having more monthly income (\$200 employment exemption and 50% earnings exemption for child support payments) and which will help to address inadequacy of social assistance rates - A number of other rule changes proposed will help to shift the culture of social assistance from being a punitive program and create equity amongst social assistance recipients (harmonization of asset rules, exemption of primary vehicles, greater exemptions for longer term investments, determination of financial independence of adults living at home, and harmonizing the definition of couple to align with Income Tax guidelines). - For women, in particular, the freedom of choice to pursue child support recognizes and acknowledges the unique and sometimes difficult circumstances that sole support parents find themselves in and now respects their choice in circumstances where women would not want to pursue child support in abusive situations
Integration	Some of the recommendations seek to harmonize the differing rules and asset limits that currently exist in the ODSP and OW programs
Impact on City of Hamilton Human and Physical Infrastructure	Several recommendations in the Commission's report will streamline the eligibility processes and guidelines for both OW and ODSP recipients
Funding	Some of these recommendations will have a negative short term impact on the municipal budget as client's income is deducted from their social assistance benefit on a lower rate than currently exists in either OW or ODSP. However, this is minimal and it will be a non-issue by 2018 when OW benefits are uploaded 100% to the province
Systems Based	Income tax handles cases different than OW with dependant adults and spousal relationships, which causes confusion. Aligning definitions with the Income Tax Act will provide clarity

Criteria	Theme 6: Discussion
Accountability	Unknown at this time

THEME 7: BLOCK FUNDS AND TRANSFER OF SAVINGS

Synopsis of Commission Recommendations:

- Existing funding for employment related benefits be consolidated into a block fund and transferred to local administrator for their discretionary use to meet recipient's needs (excluding the ODSP Work-Related Benefit) (51)
- A block fund be established for other special benefits unrelated to health or employment to be used at the discretion of local administrators (52)
- Any funds transferred into the special benefits block fund not be reduced (53)
- The province to set a target for administrative savings as a result of integrating OW and ODSP and these savings be reinvested in employment services and supports (105)
- Savings resulting from slower growth in the overall caseload be invested into the longer term transformation of social assistance. Also the province set a target for reducing the number of persons with disabilities receiving social assistance and these savings be invested into the disability benefit (107)

Criteria	Theme 7: Discussion
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Client Centered	The recommendation that suggests setting a target to reduce the number of persons with disabilities receiving social assistance will require further discussion and clarification to alleviate concerns amongst persons with disabilities
Integration	Local discretion with the block funds to be created will likely provide municipalities a greater opportunity to consider options and programs within a broader human services planning context
Impact on City of Hamilton Human and Physical Infrastructure	Unknown at this time
Funding	- Recommendations to create block funds for employment related benefits and “other” special benefits while providing municipalities with needed flexibility must be adequately funded. - What is most telling and supportive for municipalities is the Commission’s own acknowledgement in its report that these block funds when created <u>should be at current funding levels!</u> The CSUMB issue was specifically identified in the Commission’s report as meeting the policy intent of the change, but that the funding level should have been maintained - The block funds identified would appear to be funded from existing resources - Other investments are identified as resulting from administrative savings from the integration of ODSP and OW and lower projected social assistance caseloads. Municipalities need to be involved in the establishment of block funding models and the associated suggested reinvestment strategies - Moving away from “monitoring to case management” means that the municipality will decide their operations based on funding available from MCSS and the municipality. There is no widely adopted process identified to determine how to proceed in this context. . Unknown at this time
Systems Based	Stream lining of benefits eliminates the varying criteria for eligibility that currently exist between the province and municipality making it easier to educate and communicate with other agencies, clients, and the community overall. A

Accountability	Unknown at this time
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THEME 8: GOVERNANCE OF SOCIAL ASSISTANCE REFORM

Synopsis of Commission Recommendations:

- Appoint a senior public servant as the Provincial Commissioner for Social Assistance with a rank of deputy minister (77)
- The Provincial Commissioner to have responsibility for the operation of the social assistance program and budget (78)
- Establish a coordinating council of representatives of municipalities and First nations chaired by the Provincial Commissioner (82)
- Establish a stakeholder advisory body, including social assistance recipients, to advise the Provincial Commissioner (83)
- Broaden the mandate of the Poverty Reduction Results Table to include oversight of the progress of social assistance transformation
- The Provincial Commissioner be given the authority to intervene if municipalities and First Nations are not meeting their targets etc. (85)

Criteria	Theme 8: Discussion
Client Centered	Creating a deputy minister position (Provincial Commissioner) to oversee social assistance may signal to clients that there is a longer term commitment required to ensure that social assistance reform takes place and a political champion required to provide oversight

	The creation of an advisory body with representation from social assistance recipients will provide an avenue for clients to provide feedback and concrete suggestions to the Commissioner
Integration	Unknown at this time
Impact on City of Hamilton Human and Physical Infrastructure	Unknown at this time
Funding	Unknown at this time
Systems Based	Unknown at this time
Accountability	- The appointment of a Provincial Commission for Social Assistance, the creation of a coordinating council and an advisory body are all important measures in providing important feedback during the implementation phase for social assistance reform and to hold the process accountable - There may be an opportunity for the Hamilton Roundtable on Poverty Reduction, as well as other local poverty reduction collaboratives, to participate in the stakeholder group and other processes used by the Commissioner or the Province in the future

THEME 9: MONITORING OF SOCIAL ASSISTANCE REFORM

Synopsis of Commission Recommendations:

- Identify targets for expected caseload size and incorporate into service agreements (69)

- Develop performance measures against defined outcomes be developed jointly with municipalities, employers, community agents etc. to ensure the measure are sound and appropriate (70)
- Baseline and outcome data be collected to form the basis for evaluating how the social assistance system is addressing the needs of recipients including higher risk groups (72)
- Municipalities to develop an annual performance report highlighting progress (73)
- The province to collate results of municipalities/First Nations progress and produce an annual report card (74)
- The annual report card to include an assessment of the social assistance system (75)
- The annual report card also report on the implementation of the transformation of social assistance and be included with its annual report on the poverty reduction strategy (76)
- The Provincial Commissioner in consultation with municipalities and others lead the process to establishing performance measures and that the Provincial Commissioner be responsible for coordinating data collection evaluation and research activities to report on the performance and integrity of the system (79)
- Each change resulting from the Commission's report be designed to set the stage for new directions and not reinforce the status quo (101)
- The province will develop a return on investment indices to measure the benefits of changes in social assistance to allow comparison of returns with the cost of implementation (108)

Criteria	Theme 9: Discussion
Client Centered	• Unknown at this time
Integration	• The annual report card produced by municipalities might provide opportunities to demonstrate how social assistance reform has been undertaken with the context of other human services at the City
Impact on City of Hamilton Human and Physical Infrastructure	• Staffing levels need to remain sufficient in order to assist clients in reaching the goals identified on their Pathways to Employment Plans •

Criteria	Theme 9: Discussion
Funding	Unknown at this time
Systems Based	The City is strongly in support of the Commission's recommendation that the province develop a return on investment indices with respect to investment in social assistance reform. Municipalities know intuitively that investing in social assistance and other measures designed to lessen the impacts of income inequality, have profound impacts on expenditures in the long term in other service areas. It has been difficult to develop these indices and to quantify this concept³⁵
Accountability	- The Commission's recommendations involving targets for caseloads, more detailed service agreements, the development of performance measures against defined outcomes will be important tools to ensure that investments made in social assistance reform are providing the intended outcomes - Annual report cards on the status of social assistance reform for both municipalities and the province will provide the public with important updates on the progress made - Outcomes will be developed based on the needs and barriers of the clients to achieve stated goals - The City of Hamilton agrees that measures, standards, and oversight need to be in place and that municipalities need to be seen as an equal partner at the table in establishing these

THEME 10: IMPLEMENTATION OF SOCIAL ASSISTANCE REFORM

Synopsis of Commission Recommendations:

³⁵ See, Makhoul, Torjman, Assessing the Benefits of Community Human Services, Caledon Institute of Social Policy, November 2012.

- Link with B.C. Centre for Employment Excellence to see if a similar organization could be established in Ontario (4)
- Develop a strategy to support alternate forms of employment for social assistance recipients (5)
- Accelerate the next phase of Ontario's Comprehensive Mental Health and Addictions Strategy and identify employment as an outcome (6)
- The Province work with municipalities, employment service providers and other key stakeholders to develop provincial standards and best practices for the provision of employment services (13)
- The province to support employer driven initiatives and establish employer councils (14)
- The province to partner with corporate leads to champion hiring persons with disabilities (15)
- The province, municipalities and not for profit sector lead by example and hire more persons with disabilities and social assistance recipients (16)
- Link changes in the minimum wage to Ontario's economic performance so that minimum wage can be used as an appropriate reference wage for setting social assistance rates (29)
- The province to undertake more research on the impact of benefit withdrawal rates on work incentive (30)
- The province establish an advisory group with a mandate to assist in the work on benchmarks and make recommendations to the Minister on rates and making rate adjustments (31)
- The province not to introduce any new benefits with the social assistance system without making them available for all low income (37)
- The complex interaction between the Northern Health Travel Grant and social assistance be explored (67)
- The province to develop a comprehensive human capital development strategy in concert with the work of the Jobs Prosperity Council (93)
- The province to undertake a broad review of existing benefits and tax transfer with a view to improving their ability to provide secure incomes to low income Ontarians (95)
- The province to establish a framework to assess the impact of changes on different higher risk groups (102)

Implementation: Provincial and Federal Government Linkages

- The federal and provincial governments continue to enhance children's benefits for all low income families (42)

- The province engage the federal government in further enhancing children's benefits and partnering to introduce a disability benefit (92)
- The province and federal government to help initiate a review of rising income inequality and the inability of the tax-transfer system to address it (94)
- The province engage the federal government and other provinces to help initiate a broader review of the benefit and tax-transfer system
- The province continue to work with the federal government on the impact on social assistance of EI, immigration and the Working Income Tax Benefit (97)

Criteria	Theme 10: Discussion
Client Centered	• The Commission supports alternate forms of employment for social assistance recipients including self-employment – this recommendation will provide more choice for social assistance recipients • Accelerating the Mental Health and Addictions Strategy and including employment as an outcome recognizes some of the unique challenges faced by social assistance recipients seeking employment • The Commission is promoting strategies that will either promote or encourage hiring persons with disabilities and social assistance recipients, which would assist municipalities who sometimes have challenges encouraging employers to hire recipients from either target group • The recommendation that states that no new benefits are to be introduced within the social assistance system without making them available for all low income persons will create equity between all those with low incomes
Integration	• The recommendations include a number of areas that the province intends to work with the federal government including: enhancing children's benefits, developing a disability benefit and a review of the EI program and tax transfers
Impact on City of Hamilton Human and Physical Infrastructure	• Unknown at this time

Criteria	Theme 10: Discussion
Funding	Unknown at this time
Systems Based	- Many of the report's recommendations represent an initial effort to begin to move away from traditional silo-based thinking towards a more integrated approach to human services planning and service delivery The Commission recommends that a broad review of all benefits and tax transfer in Ontario be reviewed in order to determine their ability to provide secure incomes to low incomes persons - Recommendations included that recommend that both the provincial and federal government continue to work on further enhancing children's benefits for all low income families and to partners on the development of a disability benefit are encouraged - The City of Hamilton also supports the recommendations that request that the federal government review the impact of federal programs, particularly EI, housing, and child care and the tax-transfer system and their impact on social assistance
Accountability	Unknown at this time

Schedule A: Key Filters Used to Analyse the Commission's Social Assistance Reform Recommendations

Criteria	Guiding Questions:
Client Centered	• Is quality of life improved? Will basic needs be met? • Do the proposed recommendations reduce poverty and income inequality? • Do the proposed recommendations meet the principles of the nutritious food basket, living wage, etc.? • Do the recommendations proposed facilitate improved access to social assistance? • Do the recommendations simplify rules, clarify expectations etc.? • Are barriers to employment considered? • Is there opportunity for client choice/engagement?
Integration	• Do the recommendations support local integrated human services planning and service delivery within the social assistance system and other municipal programs?
Impact on City of Hamilton Human and Physical Infrastructure	• How will the recommendations affect the City of Hamilton's Ontario Works staff, City infrastructure (space, buildings, equipment, technology)?
Funding	• Will the recommendations be adequately financially supported? • Are funding sources identified and clarity provided about what is included? • Will recommendations have an impact on the City of Hamilton net levy budget?
Systems Based	• Do the recommendations take into account impact on and alignment with other provincial/federal programs (eligibility, funding, collaboration etc.)?
Accountability	• Do the recommendations clarify roles/responsibilities for the municipality and province? • Do the recommendations offer opportunities for monitoring and public reporting on the status of the implementation of social assistance reform or its outcomes?