

January 5, 2018

Hon. Helena Jaczek
Minister of Community and Social Services
6th Floor, Hepburn Block
80 Grosvenor Street
Toronto, Ontario M7A 1E9

Dear Minister Jaczek,

On behalf of the Association of Local Public Health Agencies (alPHa) and the Ontario Public Health Association (OPHA), we are writing to provide feedback on the recently released "Income Security: A Roadmap for Change" report.

Our associations, representing the public health sector, are member-based and not-for-profit. OPHA represents the public health workforce and is comprised of a diverse membership of 10 public health and community health associations and individuals from the public health, health care, academic, voluntary and private sector. alPHa provides leadership to the boards of health and public health units in Ontario. Membership is open to the 36 public health units in Ontario. alPHa works closely with board of health members, medical and associate medical officers of health, and senior public health managers in each of the public health disciplines – nursing, inspections, nutrition, dentistry, health promotion, epidemiology and business administration.

Together, our associations have established a joint Work Group on Health Equity. The Work Group focuses on advocating for policies at all levels that reduce inequities in health and on promoting activities that address the social and economic determinants of health within the mandate of public health units in Ontario. The interest of our members in seeing improvements made to the provincial social security system arises from our understanding of current research linking lower incomes with poorer health status and outcomes. This link is also well outlined in the Roadmap Report. Our Health Equity Work Group reviewed the Report and prepared this response.

Previously, one or both of our associations have made submissions on related issues such as Basic Income (in 2015), the Ontario Poverty Reduction Strategy (in 2013 and 2008), the minimum wage (in 2013), and the 2012 report from the Commission for the Review of Social Assistance in Ontario. In 2017, alPHa and OPHA passed Resolutions on the Public Health sector's Response to the Truth and Reconciliation Commission Calls to Action.

First, we want to commend your government for commissioning this broad review of the Ontario income security system. The three working groups represented a wide range of perspectives layering expertise with lived experience and Indigenous representation to focus on low income and income security issues.

The Roadmap promotes taking a fundamentally different approach, putting people – and their needs and rights – at the centre of the income security system. We believe the major directions and recommendations of this report are insightful and far-reaching. If implemented, we believe that the proposed changes would have a significant impact on income and health.

We are particularly supportive of the following areas:

- Adoption of the six guiding principles as a basis for change is a crucial step needed to move away from the current ‘punitive’ system. The six guiding principles: adequacy, human rights, reconciliation, access to services, economic and social inclusion, and equity and fairness follow from the recommended new vision for Ontario’s income security system, in which:

“All individuals are treated with respect and dignity and are inspired and equipped to reach their full potential. People have equitable access to a comprehensive and accountable system of income and in-kind support that provides an adequate level of financial assistance and promotes economic and social inclusion, with particular attention to the needs and experience of Indigenous peoples” (p.69).
- Making a commitment to moving towards income adequacy
 - Establishing an adequate Minimum Income Standard that sets a goal for income assistance programs as per the recommendations made in the Report about first using the Low Income Measure (LIM) - with 30% more for people with disabilities - and eventually moving towards developing a transparent Ontario Market Basket Measure.
- Providing immediate help to those in deepest poverty and continuing to raise income assistance rates to meet the goal of the Minimum Income Standard
 - It is imperative to move on making regular and sustained increases in income support levels - the steps as outlined in the Report provide a solid plan to follow to progress toward income adequacy. We strongly urge the government to provide immediate increases in assistance levels to those in greatest need.
- Improving the broader income security system
 - Ensuring that all low-income adults receive Pharmacare, dental, vision, hearing, and medical transportation benefits, phased in over the next ten years starting with prescription drug coverage for all low-income adults.
 - Creating a portable housing benefit is critically needed now in Ontario.
- Transforming the social assistance system, including a First Nations-based approach
 - Transforming social assistance including legislative reform and establishing a culture of collaboration and problem solving, trauma-informed, equity-informed and anti-racist practices.

- Taking an 'assured income' approach for disability, that is, establishing a basic income for those with a disability.
- Creating a flat rate structure in Ontario Works and modernizing Ontario Works income and asset rules
- Respecting First Nations jurisdiction and ensuring adequate funding
 - It is reassuring to see a substantial focus on Indigenous populations as having considerable need and a very unique context, including the recommendation for self governance of social assistance.
- In order to increase accountability, we support the Roadmap's recommendation to ensure government reporting take place, with follow-up by a third party, concerning the changes that are planned. A performance measurement framework should be put in place on both an individual and system level to assess how these policy changes are affecting our communities and health.

We would like to see reform of the income security system go further than proposed in the Report in certain areas, as follows:

- In terms of Recommendation #5 about making essential health benefits available to all low-income people starting with those in the deepest poverty, we believe dental coverage should be extended to low income Ontarians beyond the age of 65 as many low income seniors do not have insurance coverage.
- We also recommend that access to mental health counselling services be extended to all low income individuals.
- In addition to the portable housing benefit recommended in the Report, which we strongly support, we believe the provincial government needs to take more measures to increase the supply of affordable, livable housing. As part of this, we urge the government to explore provincial participation in the recently announced National Housing Strategy.
- We believe a basic income approach should be taken to Ontario Works and the entire low income population - working or not.

In summary, we are very supportive of the recommendations and general direction of the Roadmap, and hope that it receives positive and swift action by your government. The Report sets out a progressive, phased ten-year plan for how change should happen, and the investments that government should make in the first three years. As a first priority, we emphasize the need for your government to act immediately to increase social security rates. This government must take action now to make life better for low-income people in Ontario.

We understand the Ministry will release its own report taking into consideration the strategies presented in this document. With this in mind, please accept our appreciation for the opportunity to share our thoughts with you.

We would value an opportunity to engage further with the government on this issue. Should you wish to discuss our feedback in greater detail, please contact Pegeen Walsh, Executive Director, OPHA at pwalsh@opha.on.ca or Loretta Ryan, Executive Director, aPHa at loretta@alphaweb.org.

Sincerely,



President
Association of Local Public Health Agencies



President
Ontario Public Health Association

cc:

Hon. Kathleen Wynne, Premier of Ontario
Hon. Charles Sousa, Minister of Finance
Hon. Peter Milczyn, Minister of Housing and Minister Responsible for the Poverty Reduction Strategy