Submission to the Social Assistance Review  
Multiple Sclerosis Society of Canada, Ontario Division  
August 2011

Introduction
The Multiple Sclerosis Society of Canada, Ontario Division, (MS Society) is pleased to provide a submission to the Commission for the Review of Social Assistance in Ontario. The changes resulting from the Social Assistance Review have great potential to have a positive and lasting impact on the lives of people with disabilities. The MS Society commends the Government of Ontario for launching a review of social assistance; this is an important review to the lives, and livelihoods, of many Ontarians.

The MS Society is hopeful that many excellent suggestions for improving the current programs will come from this process. We are pleased to engage in the review and will continue to provide our feedback where possible.

Background about Multiple Sclerosis
Multiple Sclerosis (MS) is an unpredictable and often disabling disease of the brain and spinal cord that lasts a lifetime. MS is most often diagnosed in young adults – individuals who are finishing school, starting careers and beginning families – with the average age of diagnosis being 30 years. A diagnosis of MS impacts the entire family, and ultimately, society as a whole.

MS is an episodic illness, meaning that people who live with MS may experience unpredictable and fluctuating symptoms, which may render them unable to participate regularly in the workforce. As the disease progresses, up to 80 percent of people living with MS will be unable to work full-time.

Canada – and Ontario - has one of the highest rates of MS in the world. There are between 55,000 – 75,000 Canadians who have been diagnosed with MS; 21,000 – 29,000 of these individuals reside in Ontario.

MS Society Input
Overall, the MS Society believes that a broader discussion on income security and supports programs in Canada is required. This discussion should involve all jurisdictions in Canada that provide income security – Canada Pension Plan – Disability Benefits, federal and provincial tax credits, Workers Compensation and social assistance programs - with a goal to developing a single, simplified pan-Canadian income support program which would ensure people receive the income and the benefits they need. We believe following this important provincial review Ontario should take leadership and initiate the broader discussion.

The scope of the MS Society submission focuses primarily on the Ontario Disability Supports Program (ODSP) since many people who live with episodic or permanent disabilities resulting from MS utilize, or may utilize, this program over the course of living with MS.
We also recognize there is interplay between other income security programs and ODSP, for example RDSPs and CPP-D, and that this can create challenges for ODSP recipients. As such we provide input into those broader interactive and/or systemic issues where they have a direct or indirect impact on ODSP.

**Issue 1: Reasonable Expectations and Necessary Supports to Employment**

With respect to the first issue presented in the consultation discussion paper the MS Society recommends three main changes to a renewed social assistance program:

- A simplified process for potential recipients to obtain information on the program and to apply to the program;
- A fair, equitable and customer-service oriented process;
- A program that ensures that recipients are able to live adequately while providing them with opportunities to contribute to society and remain motivated in doing so.

**Issue 2: Appropriate Benefit Structure**

Some groundwork has been done on improving the benefit structure. Recently, a private member’s bill, Bill 23: An Act to amend the Ontario Disability Support Program Act, 1997, and the Taxation Act, 2007, was introduced at the Legislative Assembly of Ontario and went through first reading on March 31st, 2010. The MS Society supports a number of the changes to social assistance in the bill and recommends they be incorporated into the commission’s final report presented to the government. Important measures of the bill include:

- Increasing the individual and spousal asset limits;
- Providing disabled persons with an incentive to find work by allowing them to maintain a larger portion of their earnings;
- Providing incentives, such as a tax credit, for employers who hire people living with disabilities for medium or long-term employment opportunities.

**Encouraging Workforce Participation**

The MS Society believes that greater attention must be paid to encouraging workforce participation and adequately supporting people who return to work. People with disabilities can and want to work. Currently to qualify for retraining to find employment, the recipient must be able to return to work full time; those who can only work part time, or freelance, are not considered, nor are the types of disability individuals may have. For people with MS who experience fatigue and/or chronic pain, working full-time is often not an option.

Expanding retraining and educational opportunities to individuals who might be able to work part-time may broaden their skill sets, making them more employable for the future, and may help to subsidize their income and become productive taxpaying members of society.

It is always a challenge to create definitions on certain terminology, however sometimes it can validate and legitimize an issue. One approach would involve building a consensus on the definition of disability and, in particular, episodic disability. MS can often cause disabilities that are invisible and may be episodic. This can make it difficult for employers to understand their needs, and therefore accommodate them. Terminology that would remain broad and yet recognize the episodic nature of disabilities would establish some guidelines and recognize indiscernible disabilities that people experience.
The government of Ontario should also review the employment equity laws and add in parameters that would help those living with episodic or permanent disabilities participate actively in the workforce. It should also ensure that there is broader awareness of the benefits that employers would gain as a result of hiring individuals with disabilities.

The government should consider establishing an award recognition program for businesses and organizations that find innovative ways of hiring and supporting employees living with disabilities. This would create opportunities to share best practices, encourage recruitment, and publicly recognize businesses and organizations that hire, train, and provide accommodation for employees living with disabilities. Recognition could also be provided to businesses and organizations that achieve a certain percentage of recruitment of those living with disabilities.

Summary of MS Society Recommendations:
- Expand retraining and educational opportunities to individuals who can work part-time.
- Ensure terminology is inclusive of people who live with episodic disabilities.
- Review employment equity laws and include definitions that would help people living with episodic or permanent disabilities participate actively in the workforce.
- Establish an award recognition program for businesses and organizations that find innovative ways of retaining and supporting employees living with disabilities.

The MS Society also supports the recommendations that have been put forth in the paper, “What Stops Us from Working?” prepared by John Stapleton, Stephanie Procyk from Open Policy and Lindsay Kochen from the Dream Team. Some of these suggestions include:

- Increasing the Work-Related Benefit (WRB) to $150 a month;
- Implementing a 12-month, time-limited earnings exemption of $300 a month for the first year of earnings;
- Allowing Canada Pension Plan-Disability (CPP-D) recipients whose payments are too high for them to qualify for ODSP cash benefits to still qualify for ODSP ancillary benefits, such as housing and transportation;
- Assessing rent based on earnings after deductions are made to earnings;
- Continuing ODSP benefits throughout the reapplication for those who have lost CPP-D benefits;
- Increasing the Employment Start-up Benefit (ESUB) to $1,500;
- Creating a financial assistance planning program or linking with organizations that already provides this service voluntarily.

Recognizing the Real Costs of Living with a Disability
Currently, there is no policy or program in place to help ease the burden of increasing costs of electricity use for those living with disabilities and/or chronic illnesses. The increase in electricity prices - charging more for electricity use during peak hours - unfairly singles out people living with MS and others who require devices powered by electricity. Seniors and individuals who live in northern communities have been provided with energy rebates, but people with disabilities have not. Income assistance, rebates and/or refundable tax credits should be provided to people with disabilities who have higher utility bills resulting from medically required air conditioning, higher heating bills, the need to run medical equipment (such as charging power chairs and scooters). These benefits could be provided to those who qualify for the Disability Tax Credit and/or to those who qualify for ODSP.
The Assistive Devices Program (ADP) provides welcome assistance for persons with disabilities who require devices such as wheelchairs, walkers, hearing aids and diabetic supplies. While ADP is the responsibility of the Ministry of Health and Long-Term Care, there are important interactions between ADP and ODSP that could be improved. For example, the rules to qualify for ADP are complex and the process is too lengthy and should be simplified. In addition ODSP should look at reviewing and covering equipment requests denied by ADP as well as requests for needed equipment that is not on the ADP approved list. ODSP should also look into ensuring that there is equity in coverage throughout all areas in Ontario. For example an MS client living in Newmarket will likely be able to access funding from ODSP for a hospital bed and mattress while MS clients living in areas such as Brantford or Sault Ste. Marie will not likely be able to receive ODSP funding for the same equipment. In the view of the MS Society, people who rely on ODSP would be better served by a simpler application process, and a better coordination between the two programs so people understand the devices for which they qualify and the flexibility to allow people who require a device not covered by ADP to have it funded by ODSP.

Summary of MS Society Recommendations:
- Income assistance such as rebates and/or refundable tax credits should be provided to people with disabilities to assist with higher utility bills.
- Better interaction with the Assistive Devices Program including a simpler application process, better coordination and flexibility to allow people who require a device not covered by ADP to have it funded by ODSP.

Issue 3: Easier to Understand
When people turn to social assistance programs they do so during a stressful period of their life. The process needs to be streamlined and made user-friendly to make the process as easy and supportive as possible. As one MS Society volunteer noted, “My heart has broken for many friends who are left so frustrated and hopeless! It is also very much like health care where some things are available in one part of the province and are not in others.”

There is a need to promote and advertise existing resources for people living with disabilities who are looking for employment. Recently, ODSP launched a valuable online resource, Don’t Waste Talent (http://www.mcss.gov.on.ca/en/talent/) that is housed within the Ministry of Community and Social Services site. This site is an existing resource that could also provide a listing of free employment services that exist in local communities. For example an MS Society volunteer has cited the Durham Region Employment Network (DREN) program in Durham (www.dren.org), with support from the Ontario Trillium Foundation, as being a successful free employment search service for people with disabilities.

The Ontario government has also launched the Ontario Benefits Directory (http://www.ontario.ca/en/residents/benefitsdirectory/index.htm), a site that describes the more than 40 benefit programs and tax credits offered. Another example is Health Gateway (www.healthgateway.ca), an innovative web-based resource for people living with episodic disabilities and complex chronic illnesses that provides a one-stop resource for information that people need to manage their health and daily living needs including employment and housing information, income support, equipment, services support and funding. Part of the site, officially launching on 18th October 2011, will be dedicated to guiding individuals on ways to enter or re-enter the job market. The Ontario Episodic Disabilities Network (OEDN), a network of organizations working on issues affecting people with episodic disabilities, provided quality resources and content for Health Gateway and the website is the result of collaboration between Bridgepoint Health and the Canadian Working Group on HIV and Rehabilitation (CWGHR).
Members of the OEDN and have also supported the creation of resource guides for human resource professionals on the hiring and retention of those living with disabilities. Managing Episodic Disabilities is an online self-directed course (http://cwghrcampus.hivandrehab.ca/online-course-descriptions.php#medcourse) that helps human resource professionals understand episodic disabilities and learn how to accommodate, encourage workplace participation and provide opportunities for people living with episodic disabilities.

The Ontario government should create an inventory of these online and offline resources and existing employment services within the province. A centralized location for people with disabilities to find this information would ease access and create greater transparency.

**Putting People First**

Some ODSP recipients from the MS community have received poor customer service and sometimes do not feel supported by their case worker. Fraud is always a possibility within the system, however there is a sense that case workers approach each client with the view of fraud in mind. One MS Society volunteer, who already faces hurdles to obtaining employment due to disability, was embarrassed when dealing with ODSP and has decided not to continue searching for employment due to this unfriendly treatment. This issue was recently highlighted in an article, *Disabling effect of Ontario Disability Benefits*, published by the Toronto Star on August 31st by city columnist Joe Fiorito.

It is recognized that case workers are carrying heavy caseloads and that this is, undoubtedly, stressful. Heavy caseloads, complex program rules, and poor customer service create challenges for people with disabilities who need to navigate the system. Ongoing customer service and disability awareness training, manageable case loads and simplified rules for obtaining and maintaining ODSP benefits would improve the relationships that some ODSP clients have with their caseworkers. In addition, it is hoped, the Accessible Customer Service Standards will help to improve treatment of ODSP clients.

**Summary of MS Society Recommendations:**

- The Ontario government should create a centralized inventory of online and offline resources of benefits and employment services for Ontarians with disabilities.
- Put people first by providing ongoing customer service and disability awareness training, manageable case loads and simplified rules for obtaining and maintaining ODSP benefits.

**Issue 4: Viable over the Long Term**

As noted earlier, The MS Society believes that a broader discussion on income security and supports programs in Canada is required. This discussion should involve all jurisdictions in Canada that provide income security – Canada Pension Plan – Disability Benefits, federal and provincial tax credits, Workers Compensation and social assistance programs - with a goal to developing a single, simplified pan-Canadian income support program which would ensure people receive the income and the benefits they need. We believe that following this important this provincial review, Ontario has the potential to take leadership on this initiative and is in a position to initiate the broader discussion.

Currently, there is a mish-mash of social assistance programs in Canada, creating duplication of services and administrative costs, at times resulting in claw-backs, and causing greater bureaucracy and confusion on the services provided. The creation of a single, simplified pan-
Canadian income security program would help to reduce administrative costs and duplication of effort.

Also outlined earlier, taking measures to help – and not penalize – ODSP clients to seek and engage in active employment, whether it be part-time or full-time, should help to create greater long-term financial viability of the ODSP.

Summary of MS Society Recommendations:
- Ontario should take leadership in working with the federal, provincial and territorial governments to develop a pan-Canadian income security and supports program.
- Help ODSP clients seek and engage in active full-time or part-time employment.

Issue 5: An Integrated Ontario Position on Income Security
The Ontario government’s practice of claw backs from people who receive benefits and/or income from other sources needs to be carefully considered and reduced in the short-term, and, ideally, eliminated in the long-term. This is strongly linked to the harmonization and coordination of provincial and federal income security and supports programs.

The provincial government should continue to upload social services and should not download administration and funding of social services to municipalities. Many ODSP and social assistance clients have noted that they find the system confusing and find it difficult to navigate the complex system of income supports because they deal with three levels of government to receive the benefits they require. A simple, coordinated system between all levels would be more beneficial.

Summary of MS Society Recommendations:
- Reduce claw backs for people who receive income from sources other than ODSP and eliminate claw backs in the long-term under a certain income level.
- Continue to upload social assistance and other social services back to the province.

Conclusion
The MS Society appreciates the opportunity to provide input into the Social Assistance Review. We look forward to further dialogue and collaboration on improving income supports for people living with MS, who are at the heart of all that we do.

For more information please contact:

Kim Steele
Manager, President’s Office and Strategic Initiatives
416-967-3001
kim.steele@mssociety.ca

Natasha Mistry
Coordinator, Government Relations and Communications
416-922-6600 ext. 3193
natasha.mistry@mssociety.ca