



**Response to the Economic and Social Inclusion Corporation (ESIC)'s  
call for submissions on  
*Overcoming Poverty Together (OPT) 4***

N.B. Disability  
Executives'  
Network



Réseau N.-B. des dirigeants  
des organismes pour les  
personnes atteintes de défis

**NEW BRUNSWICK DISABILITY  
EXECUTIVES' NETWORK**

## Response to the Economic and Social Inclusion Corporation (ESIC)'s call for submissions on *Overcoming Poverty Together (OPT) 4*

### New Brunswick Disability Executives' Network – April 2024

The New Brunswick Disability Executives' Network (NBDEN) welcomes the opportunity to contribute to development of the incoming poverty reduction plan, *Overcoming Poverty Together (OPT) 4*. A renewed poverty plan presents a significant opportunity for bold action and meaningful change for people with a disability living in poverty – often deep poverty – throughout the province. We are pleased to bring forward the following recommendations to the Economic and Social Inclusion Corporation (ESIC) on behalf of New Brunswickers with a disability that we support.

#### ***Statement of Urgency***

Disability rates are on the rise across the country, and they are rising fastest here in New Brunswick. The 2022 *Canadian Survey on Disability* reports that New Brunswick has the second highest rate of disability at 35.3%. This represents over one third of New Brunswick's population and a significant increase of 8.6% from the previous disability survey data released in 2017 – the biggest increase in Canada.

People with a disability are one of the populations most impacted by poverty in New Brunswick, yet they have been historically overlooked in the development of provincial poverty reduction plans. We cannot continue with this approach – there is an **urgent need for targeted disability poverty measures**.

#### **Accessibility of Consultations**

People with lived experience must be actively involved in consultations about policies and programs that impact them. There is no substitute for the voices and expertise of people who live with a disability (and, when appropriate, those who support them). While it is critical to consult with disability organizations that support and advocate with and for people with a disability, it is imperative to provide people with actual lived experience with the opportunity for meaningful consultation. This includes providing any supports and accommodations necessary to ensure the accessibility of consultations and communications.

**Recommendation 1:** *We recommend that ESIC ensure that all future consultations and communications are planned several months in advance and fully accessible to persons with a disability and that ESIC collaborate with NBDEN members to develop measures on accessibility.*



## Poverty and Disability

In general, people with a disability experience worse socioeconomic outcomes than people without a disability, including fewer opportunities to pursue post-secondary education, increased negative health outcomes, lower employment rates, and higher poverty rates. There are multiple compounding factors contributing to poverty for people with a disability, along with additional disadvantages and barriers that perpetuate inequality.

According to the Market Basket Measure (MBM) – Canada’s official poverty measure – New Brunswick’s poverty line ranges from \$23,754 to \$24,395 for a single person, and the deep poverty threshold is \$18,296.<sup>1</sup> Data reported to NBDEN by the Department of Social Development indicates that between 10,000 and 11,000 people with a disability in New Brunswick were receiving Social Assistance benefits (either as people certified ‘disabled’ under the Extended Benefits Program or as people designated to have ‘long-term needs’ under the Transitional Assistance Program), with less than half receiving the maximum amount through Extended Benefits.

**New Brunswick has the largest gap in the country between provincial income assistance for a single person with a disability and the official Market Basket Measure level of poverty.<sup>2</sup>**

Currently, a single person with a disability receiving Extended Benefits receives a maximum of \$13,416 per year, while those receiving Transitional Assistance receive a maximum of \$10,320 per year.

Thousands of **New Brunswickers with a disability are living in deep poverty.**

## Poverty measurement

MBM is based on the cost of a “basket” of goods and services required to meet an individual’s or family’s needs to achieve a basic standard of living for a **person without a disability**. People with a disability often experience additional costs to have the same standard of living as people without a disability.<sup>3</sup> These additional costs include, but are not limited to: medical expenses, accessibility modifications, assistive devices and equipment, support services, and transportation. Since the MBM does not account for the higher cost of living to address disability-related expenses and needs, it is likely that poverty rates among people with a disability in New Brunswick are highly underestimated using the MBM as a key poverty measure.<sup>4</sup>

<sup>1</sup> <https://www.cbc.ca/news/canada/new-brunswick/new-brunswick-social-assistance-rates-lowest-in-canada-1.6934198#:~:text=Although%20welfare%20rates%20are%20low,income%20poverty%20threshold%20is%20%2418%2C296>

<sup>2</sup> [https://maytree.com/wp-content/uploads/Welfare\\_in\\_Canada\\_2022.pdf](https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf)

<sup>3</sup> Inclusion Canada

<sup>4</sup> <https://link.springer.com/article/10.1007/s11205-022-02900-1>





Given that official poverty measures are often used to develop income benefits for people with a disability, it is critical to ensure that these measures accurately account for the unique barriers faced by people with disabilities and the additional cost of living with a disability.<sup>5</sup> To create an adequate policy framework, a more comprehensive and inclusive approach is required, including significant data collection to quantify the additional costs of living with a disability followed by an adjusted MBM to reflect the additional costs of living with a disability.<sup>6</sup> Until the actual cost of living with a disability accurately reflected through poverty measurement, social programs based on these measurements will remain inadequate.

**Recommendation 2:** *That the government of New Brunswick recommend and strongly encourage the government of Canada to develop a disability-adjusted Market Basket Measure (MBM) and offer to collaborate in a process to determine how the new measure will be calculated.*

## Income Security

New Brunswick's Social Assistance rates are the lowest in the country.<sup>7</sup> Our benefit rates are far below most other jurisdictions and below the Canadian average for a single person with a disability, which is around \$16,500 per year. Recently-implemented affordability measures like the monthly \$200 household supplement for social assistance recipients are helpful, but they are not enough.

Our income assistance rates are simply too low, and our eligibility criteria for disability income benefits are far too restrictive. Data from 2021 shows that over 62% of people who apply for disability income benefits are not being approved.<sup>8</sup> A modernized, multi-pronged approach is needed to lift New Brunswick from the bottom and to support people with a disability to live with dignity and free from poverty, including the modernization of income support (and other) programs for people with a disability.

In addition to the necessary increase in benefit rates to reflect the cost of living with a disability and the rising cost of living in general, it is critical that New Brunswick commit immediately to exempting the Canada Disability Benefit (CDB) as a source of income for those eligible for the provincial disability income benefits or who otherwise qualify for the CDB. Expected to come into effect within the next year, the forthcoming CDB presents New Brunswick with the opportunity for national leadership by enabling its citizens to combine federal and provincial benefits and to have an income at or slightly above recognized poverty measures.

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<sup>5</sup> Inclusion Canada

<sup>6</sup> <https://link.springer.com/article/10.1007/s11205-022-02900-1>

<sup>7</sup> [https://maytree.com/wp-content/uploads/Welfare\\_in\\_Canada\\_2022.pdf](https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf)

<sup>8</sup> NBDEN Brief on Social Assistance Reform (2021): [https://nbacl.nb.ca/wp-content/uploads/2021/10/NBDEN-Executive-Brief-SA-Reform-Final-July-20-2021\\_final.pdf](https://nbacl.nb.ca/wp-content/uploads/2021/10/NBDEN-Executive-Brief-SA-Reform-Final-July-20-2021_final.pdf)



**Recommendation 3:** *Develop and implement less restrictive eligibility criteria for disability income benefits that is open, fair, and transparent and introduces a right of appeal.*

**Recommendation 4:** *Modernize the definition of disability to reflect the definition in the Accessible Canada Act.*

**Recommendation 5:** *Establish a provincial disability income benefit at a rate that reflects the additional cost of living with a disability and the rising cost of living:*

- a) *Increase provincial disability income benefit rates for people with a disability to a minimum of \$1500 per month and maintain the current cost of living increase for benefits*
- b) *Ensure that eligible people with a disability are able to combine provincial and federal benefits by committing immediately to no claw-backs related to the Canada Disability Benefit.*

## Affordable and Inclusive Housing

Housing is more than simply a basic need; it is a precursor to many other critical aspects of building and living a life with autonomy, dignity, and choice. Access to adequate and affordable housing is a right recognized under international law,<sup>9</sup> yet New Brunswick is facing a provincial affordable housing crisis, leaving thousands of New Brunswickers – including people with a disability – without a safe place to live.

People with a disability are more likely to be housed in the rental market than the general population.<sup>10</sup> In November 2022, New Brunswick rent increases were reported to be well above the national average of 4.7% from October 2021 – October 2022 at an average increase of 7.9%, despite the rent cap that was in place at the time.<sup>11</sup> In June 2023, it was reported that **New Brunswick rents were the fastest-rising (and had the largest increase) in Canada** at 5.7% within the first five months after the rent cap ended.<sup>12</sup>

Currently, there is a lack of access to affordable housing and in the supply of inclusive housing. **Inclusive housing is safe, affordable, physically accessible, close to activities, amenities, and services and welcoming of all people within diverse and dispersed mixed income developments, structures, and neighbourhoods.** Too many people under 65 with a disability in New Brunswick are living in congregated and segregated housing, including special care and nursing homes – many of which are working-age adults. There are 1,863 adults with a disability

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<sup>9</sup> United Nations Convention on the Rights of Persons with Disabilities - Article 28 (2006).

<sup>10</sup> Statistics Canada. Housing Experiences in Canada: Persons with Disabilities (June 2022). Retrieved from: <https://www150.statcan.gc.ca/n1/pub/46-28-0001/2021001/article/00011-eng.htm>.

<sup>11</sup> <https://www.cbc.ca/news/canada/new-brunswick/nb-landlords-big-year-1.6666057>

<sup>12</sup> <https://www.cbc.ca/news/canada/new-brunswick/new-brunswick-tenants-fastest-rising-rents-1.6890652>



living in special care homes and approximately 300 adults with a disability living in nursing homes, while the majority of people living in community residences – roughly 595 people – are adults with a disability.<sup>13</sup> Congregate housing reinforces poverty and does not support autonomy, choice, or opportunities for support social inclusion for people with a disability.

The provincial, multi-year housing strategy released in June 2023 provides hope for change through new initiatives like the Rent Bank, the Direct-to-Tenant Benefit, and the development of additional affordable housing units. The strategy does not, however, indicate how people with a disability will benefit from new housing initiatives nor how housing developments will be inclusive by design. It is critical that government commit to ensuring that people with a disability are prioritized in housing policy and programs, including the new initiatives presented in the 2023 NB Provincial Housing Strategy. Additionally, New Brunswick should look to experts in accessible and inclusive housing for support and guidance on increasing the supply of **inclusive housing – housing that is accessible, affordable, and dispersed.**

**Recommendation 6:** *Increase access to affordable housing for people with a disability.*

- a) *Develop and adopt policy and housing programs designed to ensure that people with a disability are prioritized, including the new initiatives presented in the 2023 NB Provincial Housing Strategy.*
- b) *Develop a Direct-to-Tenant Benefit for people with a disability with customized eligibility criteria and benefit rates.*
- c) *Revise current policies to make Portable Rent Supplements more flexible, including to enable the transfer of Portable Rent Supplements to a direct payment benefit to persons with a disability.*

**Recommendation 7:** *Develop requirements to ensure that organizations involved in housing development (including developers, external funders, and provincial and local governments) commit to housing inclusivity and mixed-income housing for the development of new housing in New Brunswick.*

- a) *Explore the potential to consult with experts on developing accessible and inclusive housing and housing policy and programs.*
- b) *Commit to adopting Inclusion NB's proposed definition of housing inclusivity in the implementation of the provincial housing strategy.*
- c) *Invest in provincial affordable housing incentives (i.e. the Rental Housing Program) that facilitate the dispersion of affordable units within new housing developments.*

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<sup>13</sup> GNB Department of Social Development, March 10, 2022, [https://www2.gnb.ca/content/gnb/en/news/news\\_release.2022.03.0128.html#:~:text=There%20are%20about%20475%20adult,to%201%2C863%20adults%20with%20disabilities](https://www2.gnb.ca/content/gnb/en/news/news_release.2022.03.0128.html#:~:text=There%20are%20about%20475%20adult,to%201%2C863%20adults%20with%20disabilities).



**Recommendation 8:** *Actively encourage and support municipalities to:*

- a) *Develop inclusionary zoning bylaws to require private developers to ensure that a percentage of new housing development is designated as affordable units, and*
- b) *Develop and implement bonus incentives for housing developments that include dispersed affordable housing units.*

## Post-Secondary Education and Employment

New Brunswick is a leader in inclusive education legislation and policy within Canada and internationally, but this does not extend to post-secondary education. Fewer youth with a disability are attending post-secondary education; 18% of persons with a disability do not have a certificate, diploma, or degree (compared to 9.6% of persons without a disability (Statistics Canada, 2017)).<sup>14</sup> Students with a disability simply do not have equal opportunity to attend post-secondary education, and it's time for that to change.

Access to employment is another significant barrier for people with a disability. Many people with a disability can and want to work, yet employment rates for working-age persons with a disability are significantly lower than those without a disability – 55% of persons with a disability were employed in NB in 2017 compared to 77% of people without a disability.<sup>15</sup>

The traditional welfare model of income support presents a significant barrier to employment for individuals with a disability receiving social assistance. In its current state, New Brunswick's social assistance program is not designed in a way that support adults with a disability to achieve greater independence, maintain a livable income, and contribute to the economy of the province. A modernized income support program with built-in employment incentives is critical to provide a stable pathway toward financial security for people with a disability. For example, an increase to the current wage exemption would not only help to incentivize employment for people receiving income benefits but also to maintain an adequate standard of living through the transition to sustainable employment. Individualized support to explore, prepare for, and access employment is also a critical component of an effective income support program.

**Recommendation 9:** *Expand opportunities for people with a disability to attend post-secondary education by expanding the number of seats available at NBCC and CCNB through the special admissions processes and adopt practices such as inclusive “micro-credentialing” (tailored, industry-specific, rapid training) to increase opportunities for post-secondary learning.*

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<sup>14</sup> <https://www.nbjobs.ca/sites/default/files/pdf/2020-02-11-lmi-report-pwds-en.pdf>

<sup>15</sup> <https://www.nbjobs.ca/sites/default/files/pdf/2020-02-11-lmi-report-pwds-en.pdf>



**Recommendation 10:** *Adopt a new policy on employment incentives that would increase the wage exemption from the current full exemption on the first \$500 of net income earned plus a 50% exemption on the balance to a full exemption on the first \$800 of net income earned plus a 50% exemption on the balance.*

## Disability Supports and Transportation

New Brunswick has the second highest rate of people with a disability in the country at 35.3%, and many people within this population require disability supports and services to participate in the community in meaningful ways. Often, people with a disability lack real choice over where they live and the support that they receive. A modernized, human rights-based disability support services model that is focused on individualized supports and choice, control, and autonomy for people with a disability is essential to address this gap.

In 2019, NBDEN set out a number of key recommendations to support better access to transportation that addresses the barriers people with a disability experience. Access to transportation plays a key role in improving the quality of life and community involvement of people with a disability, including their participation in the labour force and earning an income. The three priorities around increasing the **accessibility, affordability, and availability** of transportation services set out in OPT 3 remain critical to people with a disability who need timely, on-demand transportation options that are available when they need them.

**Recommendation 11:** *To effectively address poverty experienced by people with a disability, NBDEN recommends that the Department of Social Development develop a collaborative committee to redesign the disability services model and ensure that standards, benchmarks, and a human resources plan is developed to ensure the success of the model.*

**Recommendation 12:** *NBDEN recommends that Regional Service Commissions require that accessible and available transportation for persons with a disability be a requirement of all funding provided to Community Inclusion Networks or other organizations for transportation initiatives.*







## About NBDEN

NBDEN organizations are significant employers and collectively employ 316 staff and have over 663 volunteers engaged in our organizations. We also deliver a total of 114 programs and services throughout New Brunswick and helped 642 persons with a disability secure employment and 156 people enrol in post-secondary education or training. Collectively we provided services to over 218,000 New Brunswickers with a disability in 2020-2021.

NBDEN meets monthly for four hours to network, share information and resources, engage in joint planning and training, and to collaborate on public policy developments. We are not an incorporated body, but a cohesive network with an elected secretariat, Inclusion NB, which oversees the administrative aspects of the network. The Chairperson rotates monthly and the network is governed by an unanimously adopted terms of reference. NBDEN aims to provide better opportunities, support, and quality of life for persons with a disability and their families.

