



Position Statement on Income Security



InclusionNB
Creating Opportunities • Créer des possibilités

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Position Statement

New Brunswickers with an intellectual or developmental disability must have the income and resources they require to meet their personal support and income needs. They deserve to secure the same standard of life comparable to those without disabilities. Where income support is required it must be meaningful, responsive, and adequate. People with an intellectual or developmental disability must also have access to disability-related supports and any required assistance to navigate provincial and federal to fully participate in society.

Background

Financial security is something that all New Brunswickers strive for. Having enough money to afford basic expenses and to meet one's needs is fundamental to living a full and dignified life. Yet, many New Brunswickers with a disability find themselves having to choose one basic need over another.

People with an intellectual or developmental disability face many external barriers to full participation and inclusion. Often, these barriers are compounding. For example, many cannot access affordable and inclusive housing, and are far less likely to have paid employment opportunities. Combined with a lack of adequate disability and income support benefits, this lack of access and opportunity often contributes to increased social isolation and a loss of autonomy, choice, and control.

In general, people with an intellectual or developmental disability experience worse socioeconomic outcomes than persons without a disability, including fewer opportunities to pursue education, increased negative health outcomes, lower employment rates, and higher poverty rates.

Many New Brunswickers with an intellectual or developmental disability rely on Social Assistance for their income and therefore live in deep poverty.

Income Security – Key Principles

People with a disability have the right to an adequate standard of living and social protection.¹ The following principles represent a shift from a welfare model of support to a social and human rights-based model:

1. People with a disability have the right to reasonable and necessary supports and income benefits and should be supported to participate in and contribute to social and economic life.
2. Provincial and federal disability income benefits must include fair and transparent eligibility criteria and reflect a modern social model of disability that focuses on individualized needs rather than diagnoses. The right to appeal eligibility decisions is also a critical component of a modernized income benefit program.
3. Provincial and federal income benefit rates must reflect the current cost of living **and the additional cost of living with a disability** to live with dignity and free from deep poverty.
4. Provincial and federal disability income benefits must be combinable as both levels of government have a responsibility to ensure that people live free from poverty.
5. Income security is enhanced when people have access to paid employment. Provincial and federal disability income benefit programs, as well as other services, must adopt a focus on employment support and labour market participation for working-aged adults with a disability.
6. Access to affordable and inclusive housing is integral to income security and community participation.

Modernize Definitions and Eligibility Criteria

The existing definition used to determine eligibility for disability income benefits is based on an **outdated medical model** that does not reflect the reality that people with a disability face many barriers to full participation and inclusion.

¹ UNCRPD. Article 28: <https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-28-adequate-standard-of-living-and-social-protection.html#:~:text=States%20Parties%20recognize%20the%20right,promote%20the%20realization%20of%20this>

There is currently no appeal process in place in New Brunswick – something that is available in other provinces. Applicants must wait for 6 months to re-apply and must repeat the entire application process, which is a complex process with lengthy wait times.

Fewer than 40% of people who apply for provincial Social Assistance benefits qualify for disability status,² indicating that eligibility criteria are too restrictive. Over 62% of people who apply for disability income benefits are not being approved.³

New Brunswick should **set a goal of increasing the percentage of successful applications for disability income benefits to a minimum of 50%.**

In 2018, the *Premier's Council on Disabilities Act* adopted the UN Convention on the Rights of Persons with Disabilities (UNCRPD)'s definition of disability, which recognizes that many of these barriers stem from people's interaction with society. Other provinces have adopted more modernized income benefit application processes that align more closely with the UNCRPD and the social model of disability. British Columbia's model, for example, provides the applicant with the opportunity to describe the impact of their disability on their life and allows for reviews from a medical professional (including a nurse) as part of the application process (also available in other provinces).

Action: Develop and implement less restrictive eligibility criteria that is open, fair, and transparent and introduces a right of appeal.

Achieving Income Security through Adequate Benefits

New Brunswick's Social Assistance rates are the lowest in the country.⁴

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.

²NBDEN Brief on Social Assistance Reform (2021): https://www.inclusionnb.ca/wp-content/uploads/2023/11/NBDEN-Executive-Brief-SA-Reform-Final-July-20-2021_final.pdf

³NBDEN Brief, 2021

⁴https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf

| Total welfare incomes for all example households in each province, 2022⁵⁶ | | | | |
|---|--|--|---------------------------------|-----------------------------|
| Province | Unattached single considered employable | Unattached single with a disability | Single parent, one child | Couple, two children |
| Quebec | \$20,905 | \$16,355 | \$25,715 | \$58,338 |
| Prince Edward Island | \$16,861 | \$18,715 | \$30,162 | \$47,897 |
| Saskatchewan | \$12,496 | \$17,039 | \$25,451 | \$35,089 |
| Newfoundland and Labrador | \$12,319 | \$20,400 | \$25,361 | \$32,177 |
| British Columbia | \$12,177 | \$18,054 | \$25,876 | \$38,298 |
| Ontario | \$10,253 | \$15,871 | \$23,102 | \$33,368 |
| Manitoba | \$10,252 | \$14,125 | \$25,182 | \$34,103 |
| Alberta | \$9,800 | \$21,319/\$11,268* | \$24,078 | \$35,080 |
| Nova Scotia | \$9,493 | \$12,687 | \$21,724 | \$33,449 |
| New Brunswick | \$8,031 | \$10,884 | \$21,657 | \$28,664 |

The two measures of poverty commonly used in Canada are the Market Basket Measure (MBM) and the Deep Income Poverty (MBM-DIP) threshold.⁷ The 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. The MBM-DIP is defined as “a disposable income of less than 75% of the MBM.”⁸

Currently, a single person with a disability receiving Extended Benefits receives a maximum of \$10,632 per year. According to the MBM, New Brunswick’s poverty line ranges from \$23,754 to \$24,395⁹ for a single person, and the deep poverty threshold is \$18,296.¹⁰ It is clear that New Brunswickers with a disability are living in very deep poverty, and that an increase to income benefit rates is a critical first step towards a livable income.

The higher cost of living with a disability must also be taken into consideration when evaluating and establishing income benefit rates, as well as the rapidly increasing cost of living in general.

⁵https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf
⁶These figures do not reflect cost of living increase for Social Assistance benefits introduced in 2023 nor the proposed \$200 household supplement due to take effect in February 2024.
⁷https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf
⁸https://maytree.com/wp-content/uploads/Welfare_in_Canada_2022.pdf
⁹<https://www.country94.ca/2023/08/02/n-b-has-lowest-social-assistance-rates-in-canada-report/#>
¹⁰<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>

Combinable Benefits

The *Canada Disability Benefit Act* received royal assent in June 2023. Expected to come into effect by June 2024, this will provide federal funding to low income, working-aged people with a disability. It will be supplemental in nature and is not meant to replace provincial income benefits; rather, the federal benefit is intended to assist Canadians with a disability to reach a livable income.

It is critical that the provincial government exempt the Canada Disability Benefit as a source of income for those eligible for the provincial disability income benefit. This will allow people to combine federal and provincial benefits and to have an income above recognized poverty measures.

Action: Establish a provincial disability income benefit at a rate that will allow people with a disability to live with dignity and free from poverty

- Increase provincial disability income benefit rates for people with a disability to a minimum of \$1500 per month.
- Maintain the current cost of living increase for benefits.
- Ensure that eligible people with a disability are able to combine provincial and federal benefits.

Achieving Income Security through Employment

Income benefit programs in other jurisdictions have begun the shift from the traditional welfare model to a modernized approach that includes an emphasis on supporting employment goals.¹¹ In addition to incentives like wage exemptions, individualized support to explore, prepare for, and access employment is a critical component of a holistic and progressive income benefit model for people with a disability. This requires active measures to facilitate access to training and enhanced employment incentives for people receiving income assistance, including access to transportation.

People with an intellectual or developmental disability want to work, yet more than 77% of working-aged New Brunswickers with an intellectual or developmental disability are unemployed.

¹¹Maytree, 2020 <https://maytree.com/wp-content/uploads/System-Transformation-in-Ontario-Works.pdf>

Many adults benefit from agencies delivering employment supports in their communities; however, a significant amount of work remains to implement the new standards for the Employment and Support Services Program (ESSP) adopted by the Department of Social Development in 2019.

Current policy provides minimal incentives and/or support for people with a disability receiving provincial income benefits to explore employment opportunities. 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 and, eventually, a pathway out of the income benefits program.

In December 2022, the provincial government passed amendments to the *Employment Standards Act* to more clearly define the employer/employee relationship regardless of whether a person receives accommodations to meet their needs. This will remove any ambiguity around the paying of discriminatory, sub-minimum wage stipends, **enabling minimum wage equality for all New Brunswickers** for the first time in our history and further support people with an intellectual or developmental who are working to transition out of receiving income benefits.

Action: Enhance employment incentives and facilitate employment support measures

- 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.
- Fully implement the 2019 ESSP service standards, which require agencies to focus on paid employment as a key priority for working-aged people receiving services. Prioritize developing strong agency leadership in shifting to supported employment services.
- Develop and implement a new formula to fund ESSP agencies to strengthen their capacity to support people to work. The current model is based on group and centre-based services with people occupying seats in programs. This makes it difficult to provide individualized employment supports and services and limits real pay for real work.
- Ensure the proclamation of the amendments to the *Employment Standards Act* by the spring 2024 to finally end the discriminatory practice of paying employees with an intellectual or developmental disability a small stipend instead of minimum wage.

Income Security through Access to Affordable and Inclusive Housing

New Brunswick is facing a provincial affordable housing crisis that is unprecedented. In recent years, renters have faced dramatic increases in their rent of up to 50%, often forcing people to look for alternate housing.¹²

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.¹³

In June 2023, it was reported that New Brunswick rents were the fastest-rising in Canada at 5.7% within the first five months after the rent cap ended. The increase, which was the largest in Canada for the time period, was more than double the national average.¹⁴

People with a disability are more likely to be housed in the rental market than the general population.¹⁵ They are also more likely to live in subsidized rental dwellings.¹⁶ While rent supplements are a necessary and helpful tool to access housing, the current rental market and the lack of supplements (or access to supplements) presents significant challenges; in particular, for those receiving income benefits. For additional details on housing affordability and inclusivity, please see [Inclusion NB's Position Statement on Housing](#).

Government released a new multi-year housing strategy in June 2023, and while it does include initiatives aimed at making housing more affordable and accessible for New Brunswickers, the strategy does not indicate how people with a disability will benefit from new housing initiatives. It also does not address how housing developments will be inclusive by design.

Housing inclusivity 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.

¹²Cline, J. (2021). Doubling Rent and Denying Dignity: The Affordable Housing Crisis in New Brunswick. McGill Centre for Rights and Legal Pluralism. https://www.mcgill.ca/humanrights/files/humanrights/cline_johanna_-_doubling_rent_and_denying_dignity_the_affordable_housing_crisis_in_new_brunswick.pdf

¹³<https://www.cbc.ca/news/canada/new-brunswick/nb-landlords-big-year-1.6666057>

¹⁴<https://www.cbc.ca/news/canada/new-brunswick/new-brunswick-tenants-fastest-rising-rents-1.6890652>

¹⁵Statistics 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>.

¹⁶Statistics 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>.

Action: Develop and adopt policy and programming design to ensure that people with a disability are prioritized in housing programs, including the new initiatives presented in the 2023 NB Provincial Housing Strategy.

- Commit to adopting Inclusion NB’s proposed definition of housing inclusivity in the strategy.
- Ensure the design of the direct-to-tenant benefit and the rent bank program are inclusive of and fully accessible to persons with a disability.
- Revise current policies to make Portable Rent Supplements adequate and more flexible. For example, ensure subsidies match current local rental rates, develop quicker approval processes, and enable the transfer of Portable Rent Supplements to a direct payment benefit to persons with a disability.
- Fund and support community-based disability organizations and researchers to develop and implement the processes required to assess housing needs for people with a disability, including through the collection of relevant, provincial data.



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