

**Submission to
The Honourable Jean-Yves Duclos
Minister of Families, Children and Social Development
on Canada's Poverty Reduction Strategy**

30 June 2017

Income Security Advocacy Centre
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Toronto, ON M5J 2H7

The Income Security Advocacy Centre

The Income Security Advocacy Centre (ISAC) is a provincially incorporated specialty legal clinic funded by Legal Aid Ontario to advance the rights, interests and systemic concerns of low-income Ontarians with respect to income security and employment. Founded in 2001, we are the only legal clinic in Ontario wholly devoted to systemic advocacy on income security issues. We carry out our law reform mandate through test case litigation, policy advocacy, community organizing and public education.

We are governed by a community Board of Directors with representation from all regions of Ontario and composed of individuals, academics and advocates with expertise in issues of income security and poverty. Our Board members include legal clinic caseworkers and people who identify as low-income, with representation from Indigenous communities, racialized communities, people with disabilities and recipients of income support benefit programs.

We work closely with the more than 60 community legal clinics, both local and those with a provincial mandate, who work every day with the challenges faced by low-income people in Ontario. We also work in coalition with other advocacy groups and organizations. Our analysis and recommendations are informed by ongoing consultation with and information provided by our partners and others in the anti-poverty sector.

Improvements to Government Programs

This submission addresses Question 5 of the government's discussion paper, "Towards a Poverty Reduction Strategy", issued in October 2016. Question 5 asks, *Which Government of Canada programs and policies do you feel are effective at reducing poverty? Are there programs and policies that can be improved? What else could we do?*

Publicly-administered income security benefit programs play a significant role in poverty reduction. While poverty is a multi-dimensional problem, a lack of income security is a foundational. Financial benefits provided or administered by or through government or public agencies are often the only source of income for those with the lowest incomes. Direct government transfers have an enormous positive impact on poverty rates; without these transfers, poverty rates for seniors, children, and working-age adults would soar¹. As such, ensuring equitable access to these benefits and adequate benefit levels is critically important.

In this submission, we make recommendations for improvements to the Canada Child Benefit, the Old Age Security / Guaranteed Income Supplement (OAS / GIS) system, CPP-Disability, the Disability Tax Credit, and Employment Insurance. Each of these programs plays an important role in Canada's social safety net, but each one could and should be better aligned with the goal of reducing poverty to better ensure and protect the welfare and well-being of all Canadians. We also make recommendations that would help to ensure that the Canada Social Transfer can play a better role in reducing poverty in Canada, and urge government to create a national Pharmacare program.

Our submission highlights some of the issues around unequal access to federally-administered income security benefit programs that certain groups in Canadian society face due to historical disadvantage and systemic inequities in the labour market, which is exacerbated through the current design of these programs. We also highlight areas of historical deterioration of federal responsibility for provincial and territorial income security benefit programs. Addressing these issues and inequities will make an important contribution to addressing poverty in Canada.

Canada Child Benefit

The Canada Child Benefit is a powerful tool in the struggle against child poverty in Canada and we commend the federal government for its commitment to ensure more robust financial benefits for people with children in Canada with low and moderate incomes. However, a number of changes should be enacted to allow the CCB to more fully realize its potential to address the needs of the more than 1.3 million children in Canada who continue to live in poverty².

a. Indexation

The Canada Child Benefit must be indexed to inflation, before the current projected indexation date of 2020. The CCB will lose about 8% of its value by 2020 or about \$500³, which constitutes a substantial loss in income for low-income families with children in Canada and a missed opportunity to make significant progress on reducing child and family poverty.

b. Access for Indigenous Peoples living on reserve

Take-up of the Canada Child Benefit among Indigenous Peoples must be addressed, particularly given that 60% of First Nations children on reserve in Canada are living in poverty⁴. Since the CCB is only available to those who file tax returns, and the necessity for First Nations people to file tax returns is dependent on their source of income, many First Nations families with children on reserve are likely not accessing this critically important source of funds⁵. We urge you to work with Indigenous Peoples and communities to resolve this pressing problem.

As well, anecdotal reports indicate that Indigenous peoples who are able to access the benefit may be being disproportionately targeted for CRA audits of their CCB eligibility. As noted in a submission to you from the Kinna-awaya Legal Clinic in Thunder Bay, the majority of their clients subject to audit are Indigenous, and these audits pose extreme financial hardship due to the interruption in what is a substantial source of income but also because of the CRA's unduly burdensome documentation requirements, which are often impossible for these families to meet without significant support. We urge you to address these problems with the Minister of National Revenue.

c. Eligibility and immigration status

The Canada Child Benefit must address significant gaps in eligibility for those without regular immigration status. Many people with children are currently not able to access the CCB because of their status⁶, including refugee claimants, failed refugee claimants, temporary residents of less than 18 months, those awaiting a pre-removal risk assessment, those awaiting a Humanitarian & Compassionate determination, and others. This problem applies both to the Canadian-born children of these newcomers and to their children born outside of Canada. No child in Canada should be left to live in poverty because of the status of their parent.

d. Clawbacks from social assistance benefits

Fourth, the federal government should prohibit provincial and territorial governments from clawing back the CCB from social assistance benefits or restructuring social assistance benefits for children in order to reduce the positive impact of the CCB. All children in Canada should see the full benefit of the CCB, regardless of their parent/s' source of income. There are no stipulations in place within the program or agreements with the provinces and territories that would prevent the provinces and territories from reducing social assistance benefits for children⁷, which would undermine the effectiveness of the CCB as a national poverty reduction tool.

e. Base benefit levels

The base amount of the CCB should be increased. We join Campaign 2000 and others in raising these issues and in calling for a CCB design that ensures a 50% reduction in the child poverty rate by 2020⁸.

f. Better dispute resolution processes

Administration of the CCB through the income tax system poses particular problems when disputes about eligibility, benefit amounts, and other issues arise. The CRA's dispute resolution processes, which are unduly burdensome and can take many months to reach resolution, are simply an inappropriate method through which to ensure fairness for low-income people for whom the CCB is such a significant source of income. We urge you to address this issue with the Minister of National Revenue in order to reduce hardship and ensure access to justice for low-income people in Canada.

Old Age Security / Guaranteed Income Supplement

The OAS / GIS system has played a key role in improving the income security of seniors and, given that these benefits are not contributory, helps to ensure income security for those with limited labour market participation. The GIS singles top-up in the 2016 budget is commendable and will positively impact 900,000 vulnerable seniors⁹.

a. Growing poverty among seniors and impact on vulnerable groups

Canada is losing ground on previous progress¹⁰ on improving seniors' income security. An increasing number of seniors experience or are at growing risk of poverty¹¹. The seniors' low-income rate increased from 3.9% in 1995 to 11.1% in 2013¹². A growing number of seniors rely on food banks across Canada; between 2014 and 2015 in Ontario alone, food banks saw a 35% increase in usage by seniors¹³. Women are particularly hard-hit, as they make up the largest number of older Canadians living alone and have historically lower employment history and earnings¹⁴. 63% of single, low-income seniors are women^{15,16}. Older women are twice as likely to live in poverty as men, and 30% of older Canadian women live in low income¹⁷.

b. The GIS and poverty reduction

We commend the federal government for increasing the GIS singles top-up in the 2016 budget by a maximum of \$947 per year, which will have a positive impact on the incomes of 900,000 of Canada's most vulnerable seniors¹⁸. However, more can and should be done. The House of Commons Standing Committee on Human Resources, Skills Development and the Status of Persons with Disabilities (HUMA) recently recommended that government increase the Guaranteed Income Supplement¹⁹. Another, more targeted step to address the poverty experienced by the lowest-income seniors, including women, racialized seniors, and newcomers, would be to provide further increases to the GIS top-up, as proposed in the Canadian Centre for Policy Alternatives' Alternative Federal Budget 2017²⁰.

c. Preventing discrimination in low-income seniors benefits

As well, in the context of a commitment to reducing poverty, government must ensure that amendments made by the previous government to eligibility for low-income seniors' benefits will not be brought into force. A section of Bill C-31, which was passed in 2014, would disqualify seniors subject to a sponsorship undertaking from accessing low-income seniors' benefits²¹. This section would prevent sponsored parents and grandparents, for whom the undertaking period is twenty years, from accessing benefits even if they have lived in Canada for the required ten year period. There is no justification for requiring sponsored parents and grandparents to reside in Canada for ten years longer than any other resident before they can qualify for low-income seniors' benefits. As the HUMA Committee has recommended, government must ensure that the GIS "reaches all low-income seniors"²².

CPP-Disability

People with disabilities are much more likely to live in poverty in Canada, with median incomes of about \$10,000 less than people without disabilities²³. CPP-Disability is the largest public benefit program for long-term disability in Canada²⁴, but its potential to address poverty is limited. Because CPP-D is a contributory program tied to labour market participation and uses a relatively strict definition of disability to determine

eligibility, many persons with disabilities in Canada are not able to qualify. Those who do qualify are not necessarily able to live a life out of poverty. Only 15-32% of those self-identifying as having “severe” disabilities receive CPP-D benefits, resulting both from definitions of disability and from CPP-D’s contributory requirements²⁵. Changes should be made to address the poverty that persons with disabilities in Canada face.

a. Contribution requirement

The labour market participation rate of adults with disabilities in Canada is only 47%, compared with 74% for those without disabilities²⁶. Those who have had no or limited labour market participation, particularly those who acquired their disabilities earlier in life or who have episodic illnesses²⁷, are thus disadvantaged by the structure of the CPP-D program, which is based on pre-disability income. This disadvantage also affects the growing number of precarious workers in the labour market, who are predominantly women²⁸, people from racialized communities, and newcomers²⁹. Increasing access to CPP-D benefits by loosening the contribution requirement would be one step toward improving the program.

b. Low benefit amounts

CPP-D beneficiaries have a higher incidence of low-income than the rest of the population; 22% lived in low income in 2011, as compared to 15% of all Canadians aged 18-64³⁰. In 2016, the average monthly CPP-D benefit was \$933.82.³¹ This amount is 72% of the maximum payment, or only about half of the Low Income Measure—After Tax³². Many CPP-D recipients receive benefits that are so low that they still qualify for provincial or territorial social assistance benefits. However, CPP-D benefits are deducted dollar-for-dollar from social assistance, which benefits provincial and territorial governments rather than people with disabilities themselves.

Increasing benefit levels would help to ensure that beneficiaries are not living below the poverty line. We note that, in the course of its review of poverty reduction strategies, the HUMA Committee has recently recommended that government “increase the amount of Canada Pension Plan – Disability benefits so that it provides adequate income for those clients with little or no other means of income support”³³.

c. Exclusionary definition of disability

As noted above, the CPP-D program determines eligibility using a “severe and prolonged” definition of disability, which has been criticized by many as it means that many persons with disabilities – particularly those with degenerative, chronic, mental, episodic or invisible illnesses (which themselves create significant barriers to the labour market)³⁴ – are not well served by the program.

Reviewing the CPP-D definition of disability, in consultation with people with disabilities and with an eye to ensuring greater access to the program, would help to reduce poverty among people with disabilities.

National Pharmacare

We note that drug coverage is a particularly important part of the suite of benefits that persons with disabilities, and, in fact, all Canadians, require to ensure better health. This is particularly the case for low-income Canadians, many of whom do not have coverage through employer-paid benefit programs.

We join the growing chorus of advocacy groups, health care professionals, academics, and others across Canada for a public Pharmacare program, and urge the Government of Canada to review the role of such a program in reducing poverty in Canada.

Refundable Disability Tax Credit

Another important step that government could take to reduce the poverty of people with disabilities would be to convert the non-refundable Disability Tax Credit (DTC) into a refundable benefit, which numerous academics, advocates, and policy experts have recommended over the years³⁵. Doing so would provide additional support to those people with disabilities who have such low incomes that they do not pay income tax. Steps would have to be taken with the provinces and territories to ensure that these funds would not be clawed back from social assistance benefits. Others have noted that a refundable DTC would be the first step in the creation of a non-contributory federal program that would best allow the federal government to properly address poverty among people with disabilities in Canada³⁶.

Employment Insurance

The Government of Canada has made some welcome changes to the Employment Insurance (EI) program. However, additional steps can and should be taken to improve EI in the context of poverty reduction. EI is a key piece of Canada's social safety net that should provide reliable income security for workers facing unemployment, regardless of the character of that employment. But many unemployed workers in Canada continue to have serious difficulties accessing EI benefits. Eligibility requirements, the benefits calculation method, and the exclusion of migrant workers from coverage continue to be areas of concern that should be addressed, and improvements to service quality and appeals processes should continue to be made.

a. Eligibility

Onerous eligibility provisions that require high numbers of hours of insurable work prevent a growing number of workers from qualifying for benefits, given that the quality of employment in Canada continues to deteriorate, with increases in temporary, part-time, and contract work as well as self-employment³⁷. Many of these workers are from historically disadvantaged groups who are overrepresented in low-income and precarious employment, such as women, racialized people, people with disabilities, and new immigrants³⁸.

A June 2016 HUMA Committee report notes that 83.1% of those who had contributed to EI in the past 12 months and met the criteria for valid job separation had worked enough hours to be eligible³⁹. This already seemingly high coverage rate (the “accessibility ratio”) will be positively impacted by the government’s reduction of requirements for new entrants and re-entrants, which harmonizes it with the requirement for all other claimants in the economic region in which they live⁴⁰.

If the HUMA Committee’s numbers are accurate, reducing the hourly requirement would be an affordable and achievable option that could have an enormously positive impact for the seemingly small number of Canadian workers who should otherwise be eligible for coverage, but are disentitled only by their hours of work. The estimated 16.9% of workers who are denied benefits because they did not accumulate enough hours are primarily drawn from the most precarious and lowest-paying sectors of the labour market. Reducing the hourly requirement is an affordable and sensible poverty fighting mechanism because it can be paid through a social insurance program rather than from general revenues. Without such action, the numbers of unemployed workers without EI coverage will continue to grow and the ability of the EI program to respond to the needs of workers living with insecure incomes will continue to deteriorate.

We continue to support the call from many groups to lower the insurable hours requirement to 360 hours in all regions in Canada⁴¹.

b. Benefit levels

We continue to hold the position that EI benefits, currently set at only 55% of average earnings over the previous six-month period including periods of under- or unemployment, are far too low and perpetuate the labour market disadvantage experienced by women and those who are precariously employed. While some have expressed concern that the costs associated with increasing the benefit rate would be high⁴², we encourage government to view this issue through the lens of reducing poverty. The costs of not addressing income insecurity and poverty are already very well known⁴³. Particularly in a condition in which low-wage jobs in Canada continue to grow⁴⁴, aligning all programs, and particularly those that provide income support benefits, with the goal of poverty reduction should be a priority. Indeed, if the affordability is a concern, government should simply stop the practice of lowering premiums to prevent surpluses in the EI fund, or using those surpluses for other purposes, and instead increase the benefit rate. Doing so would provide a more livable level of income for unemployed workers while they look for other work. The calculation of EI Regular Benefit rates should be amended to ensure an equitable distribution of benefits to all unemployed workers.

c. Eligibility for migrant workers

Discrimination in the EI system against most migrant workers continues to be a serious problem. The EI requirement to be “ready and available for work” runs up against the

conditions of workers' temporary work permits, resulting in their effective exclusion from benefit coverage despite the requirement for them to pay into the EI program⁴⁵.

Regulatory changes made in 2012 specifically exclude migrant workers from eligibility for certain benefits, like the EI Parental benefit, that they previously had access to (and that have no such availability requirements). We continue to recommend that the EI Commission amend EI regulations and temporary visa requirements to ensure that temporary foreign workers are provided equal access to EI benefits without discrimination.

d. Service quality

The government's recent Employment Insurance Service Quality Review identified a number of problems in the delivery of EI benefits⁴⁶. We commend government for committing to address these problems with service quality and delivery and urge you to use poverty reduction as the lens through which to address them. Timely access to benefits, timely provision of quality information, and a reduction in application processing errors are all critical parts of ensuring income security for those workers relying on EI benefits to pay their bills.

e. Appeals at the Social Security Tribunal

Problems in the appeals process at the Social Security Tribunal must also be addressed to ensure that the deck is not stacked against workers who are seeking timely, fair and appropriate decisions about their EI claims. We know that a review of the SST is underway and are participating in that process. As part of a Working Group made up of representatives of community legal clinics across Ontario, we are recommending that the EI appeals process at the SST be based on four key principles, which would support government's broader poverty reduction objectives. These principles are:

- tripartite decision-making, which would restore a prominent decision-making role for both labour and business;
- speed, to see long delays in decision-making ended;
- accessibility, which would mean appellants could get through the system easily, with sufficient supports, and without a protracted legal procedure; and,
- fairness, so that appellants would have access to information about their legal requirements for qualification and all evidence that formed the basis for the denial of their benefits.

Ensuring procedural fairness in the appeal process for EI claims is an important part of ensuring income security for unemployed workers.

f. Parental and Compassionate Care benefits

We would encourage you to make additional changes to EI Parental and Compassionate Care leaves. While the 2017 Federal Budget extended Parental leave

from 12 to 18 months, parents will get the same total amount of benefits regardless of time away from work, which amounts to 55% for 12 months or 33% for 18 months. This change will not adequately support single parents or low-income families to take the extra six months away from work, as the 33% benefit rate will not be enough to support themselves and their families. The needs of low-income parents would have been better met by creating a low-income supplement to ensure that no benefits fall below \$300 / week, as recommended in the Alternative Federal Budget published by the Canadian Centre for Policy Alternatives⁴⁷.

As well, while the Budget's new Critically Ill Adult Caregiver Benefit of up to 15 weeks is a good step towards supporting those who do not qualify for the Compassionate Care benefit, expanding access to the Compassionate Care benefit would be a better solution for the 90% of Canadian workers who will be unable to take advantage of the Caregiving Benefit due to a lack of provincial or territorial "caregiving leave" provisions in employment standards.

We would urge government to consider making additional improvements based on recommendations made by a coalition of 25 community and labour organizations⁴⁸. These recommendations are focused on improving social equity and reducing poverty, and include: allowing for eight additional "use it or lose it" second parent benefit weeks; reducing the hourly requirement for EI Special Benefits to 300 hours; increasing the benefit rate for those on sick leave or on leave to care for sick family members to 70%, with a minimum benefit for low wage earners; and, expanding the current 26 week Compassionate Care benefit to those caring for someone with a critical illness but who is not necessarily at imminent risk of death as is currently required.

Canada Social Transfer

The Canada Social Transfer (CST) is the primary source of federal funding that supports provincial and territorial social programs, which are vital to maintaining a good quality of life in Canada. This includes social assistance or "welfare" programs, which provide last-resort income supports to people with disabilities and those who face other barriers to employment or have no other source of income.

The UN Committee on Economic, Social and Cultural Rights recently reviewed Canada's progress on meeting its obligations under the International Covenant on Economic, Social and Cultural Rights⁴⁹. The Committee expressed concern about the inadequacy of social assistance rates in all jurisdictions in Canada and the lack of accountability provisions in the Canada Social Transfer. The Committee recommended that Canada ensure that social assistance rates be raised "to allow a decent living for beneficiaries and their families so as to ensure an effective income safety net", and that accountability provisions be integrated into the Canada Social Transfer "to allow monitoring of how the funds are allocated to social assistance benefits"⁵⁰.

Given that approximately 5% of Canadians are recipients of social assistance but make up about 40% of people living in poverty in Canada⁵¹, the federal government must take

steps to ensure that the CST is bolstered in a way that it can play a principle role in reducing and eliminating poverty in Canada.

a. Declining federal transfers

As a Senate committee noted in 2008, the CST has been a major contributor to funding related to poverty reduction⁵². However, while federal transfers formerly provided 50% of the cost of these programs, the share of federal funding has declined significantly. The Parliamentary Budget Office has calculated that between 2011/12 and 2025/26, federal contributions will cover only 10% of the cost of post-secondary education, social assistance, and social services⁵³. This trend must be reversed.

b. Erosion of conditionality

Along with this precipitous decline in funding, four of the five conditions for federal funding were eliminated in the move from the Canada Assistance Plan to the Canada Health and Social Transfer, and finally to the CST⁵⁴. The overall objective of ensuring that provincial social assistance programs provide support to all persons in need⁵⁵ has been lost. Some researchers have concluded that the loss of conditionality provided the context and impetus for welfare reform in the 1990s and early 2000s⁵⁶. In the Ontario context, these reforms have resulted in deliberately and dangerously inadequate incomes, in the service of promoting “individual responsibility” and “self reliance through employment”⁵⁷, regardless of conditions in the labour market. And, while the social assistance incomes of people with disabilities in Ontario, who are not expected to work or seek work as a condition of eligibility, were spared deep cuts, very little has been done to address the poverty that social assistance in Ontario creates and enforces for either recipient group.

The only condition remaining after the transition from CAP to the CST was the prohibition against imposing minimum residency requirements for provincial and territorial social assistance eligibility. However, Canada recently eroded this protection in a manner that discriminates against migrants. With the passage of Bill C-43 in 2014, the provinces and territories are now able to impose minimum residency requirements for social assistance eligibility on certain groups of immigrants, refugee claimants and people without regularized status, without losing CST funding⁵⁸. These changes must be reversed.

Under the Canada Social Transfer, Canada has no accountability mechanisms or standards to ensure that social assistance programs allow recipients to meet their most basic needs. In every jurisdiction, the incomes provided to people receiving social assistance in Canada fall below, and in many cases well below, any measure of poverty in Canada⁵⁹. In Ontario, for example, a single person receives a monthly maximum of \$706 per month to cover basic needs and shelter. The maximum for a single person with disabilities is \$1,128. Even with the addition of other regular provincial and federal and tax credits, single Ontarians live on incomes equivalent to 45% of the Low Income

Measure After-Tax while single Ontarians with disabilities live on 70%⁶⁰ (without factoring in the additional costs of disability).

d. The role of the Canada Social Transfer in poverty reduction

Increased and accelerated investment in the Canada Social Transfer, as well as requirements for provinces and territories to spend those investments on improving the incomes of people receiving social assistance benefits, would represent a significant contribution to efforts to reduce poverty in Canada. Dignity for All and its national partners are recommending that the Canada Social Transfer be increased by \$2 billion to support poverty reduction provincially and territorially, tying the funding to accountability measures, poverty reduction goals, and timelines⁶¹. The Canada Social Transfer should be seen as a means of ensuring consistency, equity and accountability across Canada in the delivery of social assistance, towards a national goal of poverty reduction.

Conclusions

We appreciate the opportunity to comment on improvements that can be made to Canada's current benefit programs, with the goal of reducing poverty and ensuring more equitable access, more adequate benefit levels, improved accountability, and better program design.

Each of the programs highlighted in this submission is a critically important part of government's responsibility to ensure the well-being of the residents of Canada. Each should better respond to the needs of those who are most excluded and disadvantaged in order to achieve the goals of reducing and eliminating poverty and creating a truly inclusive Canada.

Summary of Recommendations

- Address problems in current federal income security benefit programs, including the Canada Child Benefit, the CPP-Disability Program, the Disability Tax Credit, Employment Insurance, and the Canada Social Transfer, to ensure they are aligned with the goal of reducing and eliminating poverty in Canada.

Canada Child Benefit

- Index the Canada Child Benefit to inflation immediately rather than in 2020.
- Address the low take-up of the Canada Child Benefit among Indigenous peoples living on reserve, and disproportionate targeting of Indigenous people for CRA eligibility audits.
- Address gaps in eligibility for the Canada Child Benefit that result from immigration status, to ensure eligibility for refugee claimants, failed refugee claimants, temporary residents of less than 18 months, those awaiting a pre-removal risk assessment, those awaiting a Humanitarian & Compassionate determination, and other without regularized status, and for both the Canadian-born children of newcomers and their children born outside of Canada.
- Ensure that all children in Canada see the full benefit of the Canada Child Benefit regardless of their parent/s' source of income, by ensuring that the CCB is prohibited from being clawed back from social assistance benefits, whether directly or indirectly through restructuring of benefits.
- Increase the base amount of the Canada Child Benefit to ensure that the design of the CCB leads to a 50% reduction in the child poverty rate by 2020, as recommended by Campaign 2000 and others.
- Improve the CRA's dispute resolution to reduce the hardship produced by its overly burdensome and time-consuming process.

OAS / GIS

- Provide further increases to the GIS top-up to address the poverty experienced by the lowest-income seniors.
- Ensure that the inequitable changes to eligibility for OAS / GIS that were passed in Bill C-31 in 2014, which would require sponsored parents and grandparents to live in Canada for ten years longer than any other resident before they are able to qualify, are not brought into force.

CPP-D

- Make improvements to CPP-D that would allow it to better achieve its potential as a poverty reduction tool, such as loosening the contribution requirements increasing the monthly benefit, and reviewing the definition of disability in consultation with people with disabilities.

Pharmacare

- Create a national Pharmacare program.

Disability Tax Credit

- Convert the DTC into a refundable benefit, to better support all people with disabilities in Canada, and work with the provinces and territories to ensure that the funds are not clawed back from social assistance benefits.

Employment Insurance

- Lower the insurable hours requirement for EI Regular benefits to 360 hours in all regions in Canada.
- Amend the calculation of EI Regular benefit rates to ensure an equitable distribution of benefits to all unemployed workers.
- Amend EI regulations and temporary visa requirements to ensure that temporary foreign workers are provided equal access to EI benefits without discrimination.
- Ensure that EI service quality improvements are undertaken through the lens of poverty reduction, given that timely access to benefits, timely provision of quality information, and a reduction in application processing errors are all critical parts of ensuring income security for workers relying on EI benefits.
- Base the EI appeals process at the Social Security Tribunal on the four key principles of tripartite decision-making, speed, accessibility, and fairness, which would support government's broader poverty reduction objectives.
- Make improvements to EI Special Benefits that would improve social equity and reduce poverty, including: allowing for eight additional "use it or lose it" second parent benefit weeks; reducing the hourly requirement for EI Special Benefits to 300 hours; increasing the benefit rate for those on sick leave or on leave to care for sick family members to 70%, with a minimum benefit for low wage earners; and, making Compassionate Care benefits available for those caring for someone with a critical illness but who is not necessarily at imminent risk of death as currently required.

Canada Social Transfer

- Increase and accelerate investment in the Canada Social Transfer and require provinces and territories to spend those investments on improving the incomes of people receiving social assistance benefits.
- Reverse the discriminatory changes made to the Canada Social Transfer in Bill C-43 in 2014 that allow the provinces and territories to impose minimum residency requirements on certain groups of immigrants, refugee claimants, and people without regularized status.

End Notes

- ¹ Macdonald, D. (2016). *A Policymaker's Guide to Basic Income*. Canadian Centre for Policy Alternatives, at p.18-19: <https://www.policyalternatives.ca/publications/reports/policymakers-guide-basic-income>.
- ² Campaign 2000. (2016). *A Road Map to Eradicate Child & Family Poverty. 2016 Report Card on Child & Family Poverty in Canada* at p.2: <http://campaign2000.ca/wp-content/uploads/2016/11/Campaign2000NationalReportCard2016Eng.pdf>.
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- ⁵ *Ibid*, at p. 24.
- ⁶ Income Tax Act (R.S.C., 1985, c. 1 (5th Supp.)), s. 122.6(e).
- ⁷ The Northwest Territories appears to be the only provincial or territorial government thus far that has not given families receiving social assistance the full benefit of the CCB, in that case by eliminating food and clothing supports for children. Gleeson, R. (2016). "MLA says NWT government short-changing low-income families" CBC News: <http://www.cbc.ca/news/canada/north/mla-says-nwt-government-short-changing-families-1.3811562>.
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- ¹³ Ontario Association of Food Banks (2015). *Hunger Report: A snapshot of hunger in Ontario*, at p.10: <https://oafb.ca/wp-content/uploads/2017/02/Hunger-Report-2015.pdf>.
- ¹⁴ OECD. 2013. *Pensions at a Glance: Canada*: <https://www.oecd.org/canada/OECD-PensionsAtAGlance-2013-Highlights-Canada.pdf>.
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