

SINGLE OR FAMILY-BASED BENEFITS

How should the benefit unit be defined under the new Canada Disability Benefit (CDB)?

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Summary

- The federal government must solve a contradiction in policy principles respecting the design of the new Canada Disability Benefit (CDB).
- This dilemma is created by:
 - Competing principles in social program purposes,
 - Shifting focuses on meeting family needs vs. enhancing individual rights; as well as
 - Differing definitions of the benefit unit in existing programs



Definitions of the Benefit Unit

Summary

The issues are complicated by multiple systems and roles at all government levels and in the private sector.

We present four options in response to this issue:

1. A family-based benefit unit;
2. A single (individual) benefit unit*;
3. A Half-family and half-single benefit unit; or
4. A choice-based system allowing individual applicant and enrollees to choose or elect a family or single benefit unit.

**Note: for the purpose of this presentation, we use “single benefit unit” and “individual benefit unit” interchangeably*



Summary



To maximize the effectiveness of the new CDB and achieve publicly goals stated in the throne speech, Bill C-35 and the Budget, the federal government should implement a 'smart' hybrid model incorporating all major features of a single based benefit unit while recognizing elements of family need by harmonizing benefits with other disability incomes at the federal and provincial and territorial levels.

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Issues: A Contradiction

- The federal government has inadvertently created a contradiction in policy principles respecting the design of the new Canada Disability Benefit.
- [The Throne speech](#) of September 23, 2020, announced that the Government would bring forward a Disability Inclusion Plan , which would contain:

“A new Canadian Disability Benefit modelled after the Guaranteed Income Supplement (GIS) for seniors;

A robust employment strategy for Canadians with disabilities;

And a better process to determine eligibility for Government disability programs and benefits.”

Issues: A Contradiction

- The same announcement was reiterated (word for word) in Minister Carla Qualtrough's [mandate letter dated January 15, 2021](#).
- The [2021 federal Budget](#) expanded on the purposes of the new CDB:

“The Government of Canada has a number of programs and services in place that provide support to Canadians with disabilities but these are often complex and can be difficult to navigate for users. To ensure all persons with disabilities have the support they need to overcome persistent barriers to full economic and social participation, the government is committed to bringing forward a new disability benefit.”
(Page 233)

Issues: A Contradiction

- On June 22, 2021, [Bill C-35](#), an Act to reduce poverty and to support the financial security of persons with disabilities by establishing the Canada disability benefit, had first reading in the House of Commons. This Bill:
 - “Establishes the Canada disability benefit to reduce poverty and to support the financial security of working-age persons with disabilities.*
 - “Sets out general provisions for the administration of the benefit and authorizes the Governor in Council to implement most of the benefit’s design elements through regulations; and*
 - Makes a consequential amendment to the Income Tax Act.”*

Issues: Definition of the Benefit Unit

- Bill C-35 does address some key concerns of benefit design but does not address the definition of the benefit unit which it notes would be decided in regulations.
- The Bill authorizes regulations to be made regarding eligibility criteria, the level of benefits, payment periods, applications for benefits, reviews and reconsiderations of decisions and appeals, etc.

Issues: Definition of the Benefit Unit

- Advocates were somewhat critical of the Bill due to its lack of specificity concerning coverage and process. For example, [Roxana Jahani Aval](#), Chairperson of the Council of Canadians with Disabilities (CCD) stated that:

“...It’s like we’ve been shown the building permit, but haven’t been given access to the blueprints; we know something will be built but we have no idea what the structure will be like.”



Bill- C-22 introduced June 2. 2022

No Changes from C-35

Second Reading: October 18, 2022 and referred to Committee for consideration

Hearings taking place in October and November

Will come back for 3rd reading

Once passed, it will proceed to the Senate for consideration and 3 readings and committee hearings following second reading

It will then receive Royal Assent and come into force at a date to be named once regulations are attached and an implementation date is made available.

Issues: Definition of the Benefit Unit

- In terms of the determination or definition of the benefit unit, the Act states that the government intends to borrow from the experience of seniors and child benefits, implying that the benefit unit might be designed in accordance with family needs.
- The following passage is taken from the Preamble to Bill C-35:
“Whereas progress made by Canada in reducing poverty for persons with disabilities and others contributes to meeting the Sustainable Development Goals of the United Nations;
“Whereas the Government of Canada seeks to build on its successes in addressing poverty through providing benefits for seniors and for families with children.”

Issues: GBA+ vs. GIS

- But the federal government also promised to include [gender-based-plus analysis \(GBA+\)](#) in the departmental decision-making processes and future planned initiatives .
- From the perspective of gender equality, a GBA+ analysis would tend to require that a new CDB should be available to men and women with disabilities in their own right.
- In other words, rather than being a family based benefit unit where the needs and resources of the family are considered, GBA+ is consistent with an individual or single based benefit unit where (when available), the needs and resources of the disabled applicant are taken into account separate and apart from family need and resources.



Issues: GBA+ vs. GIS

- The GIS, on the other hand, has a family based benefit structure and considers family resources in the determination of the GIS benefit. Couples who apply for the GIS are paid different levels of benefits than single and the taxable income of the couple is pooled for the purposes of the determination of the GIS benefit.
- Accordingly, a GIS-based Canadian Disability Benefit design may be seen as contradicting a crucial design parameter central to a GBA+ analysis.



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Guaranteed Income Supplement (GIS)

- The [Guaranteed Income Supplement](#) (GIS) is a non-taxable monthly payment to seniors based on their income.
- [The income](#) of a recipient's spouse/common-law partner impacts both the amount of the supplement and the point, in terms of income, where eligibility for benefits is reduced to zero.



Gender-based+ Analysis (GBA+)

- A gender-based+ analysis ([GBA+](#)) is the “process used to identify the impacts of policies, programs and services on different groups of:
 - women
 - men; and
 - gender-diverse people
- The "plus" considers many factors, such as race, ethnicity, religion, age, and mental or physical disability.”



Gender-based+ Analysis (GBA+)

- *“Introduced in Budget 2018, the Gender Results Framework ([GRF](#)) represents the Government of Canada’s vision for achieving greater equality. It is a whole-of government tool designed to:*
 - Track how Canada is currently performing
 - Define what is needed to achieve greater equality
 - Determine how progress will be measured going forward
- The framework is comprised of six pillars, including:
 - Economic Participation and Prosperity;
 - Education and Skills Development;
 - Leadership and Democratic Participation;
 - Gender Based Violence and Access to Justice;
 - Poverty Reduction, Health and Well-Being; and,
 - Gender Equality Around the World”



Gender-based+ Analysis (GBA+)

- [Results from GBA+ analysis](#) recommend the payment of individual-based benefits.

“Public Services and Procurement Canada (PSPC) recognizes that lived experience is the cornerstone of the Digital Accessibility Strategy.

By taking into account and emphasizing the lived experiences of persons with disabilities, the strategy seeks to remove the concept of “exception”, choosing rather to view disability as an intersection of the identity of a multi-faceted individual.”



Gender-based+ Analysis (GBA+)

- [Stats show](#) that disability is more prevalent among women than men. Women with disabilities are more likely to live alone or to be lone parents than women without disabilities.

“Prevalence of disability among Aboriginal women is higher than Aboriginal men and non-Aboriginal women and men; Prevalence of disability is lower among immigrant women than non-immigrant women aged 55 or younger, but higher among those aged 65 or older;

Visible minority women are less likely than women who do not belong to a visible minority group to have disabilities.”

The following slides offer 2 initial examples of single and family definitions of the benefit unit in Canadian income security programs

Canada Pension Plan (CPP)

The Canada Pension Plan has an individual based benefit unit.



“The basic payment amount is \$510.85. We add to the basic amount based on how much you paid into the Canada Pension Plan while you worked.”

- [CPP](#)

Ontario Disability Support Program (ODSP)

The Ontario Disability Support Program (ODSP), like all provincial and territorial income assistance programs, defines the benefit unit as a family unit.



“The amount of income support payable for basic needs is calculated on a monthly basis and determined based on the family size, age of dependants, geographic location, and the individual circumstances of the benefit unit...”

“In general, if the person to whom the situation applies is a single person, income support should be reviewed to determine if there is continued eligibility.

“If the recipient has dependants, the person’s portion of income support is removed or reduced from the income support calculation depending on the situation and circumstances.”

– [ODSP](#)

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1. Competing principles underlie benefit unit determination

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- The values that guide real-world policies (in most western countries) relate to our shared heritages which in Canada are enshrined in the *Charter of Rights*: life, liberty, and security of the person.
- Accordingly, there is a strong relationship between democratic principles and how benefit programs define the benefit unit.



Definitions of the Benefit Unit

1. Competing principles underlie benefit unit determination

However, the democratic principles that guide the welfare state do not necessarily favour one definition of the benefit unit over another.

“Welfare states – in which government is instrumentally involved in the economic and social conditions impacting its citizens – are built on these values: their differences are borne out in their mix, on the relative emphasis placed on one above the others. These foundational values, expressed in political culture and discourse, determine a great degree about the laws and policies that shape society.

[Avram Denburg](#), 2016, Canadian values, social policy and the health of our kids

***Emphasis: Open Policy**

1. Competing principles underlie benefit unit determination

We contend that:

- a single benefit unit most closely aligns with equality; while
- a family based unit corresponds better with liberty and solidarity.

“Societies premised on equality, similar to several of the Scandinavian countries, emphasize universalism as an organizing principle for policy, and conceive of a strong role for the state in stewarding resources to mitigate inequality.

Societies premised on liberty, similar to ours, focus on the needs of those at the margin and leave the rest to the whim of the market.

Societies premised on solidarity focus on collective goals and obligations, and seek to minimize risks to social stability through policy, often in the form of worker-based insurance. Many focus on traditional models of the family as the locus for, and beneficiary of, social policy, and are often geared toward the maintenance of existing social patterns”

[Avram Denburg](#), 2016, Canadian values, social policy and the health of our kids

1. Competing principles underlie benefit unit determination

In addition to democratic principles, there are various policy continuums that inform the discussion of the desirability of single vs. family benefit units. (See also Appendix A).



For example:

- [Rights-based approaches](#) emphasize the realization of rights and recognize that rights can only be realized through empowerment; while
- [Needs-based approaches](#) emphasize meeting needs and recognize needs as a valid claim.
- [Self-reliance and independence-based approaches](#) may be agnostic to the definition of the benefit unit as a single or family.

1. Competing principles underlie benefit unit determination

- The *Obstacles* (1981) recommended rights-based omnibus legislation for Canadian disability policies.
- In 1982, people with disabilities were designated as one of five groups whose rights were specifically guaranteed in [Section 15](#) of *Canadian Charter of Rights and Freedoms*.

Policies are dedicated to establishing
self-reliance and independence
of people with disabilities.



2. Family Needs and Individual Rights

2. Family Needs and Individual Rights

- For low-income families, a single benefit unit does not take into account the needs of the recipient's family.
- Therefore, if the federal CDB adopts a single benefit unit, income Assistance/Social Assistance benefit payments would need to be continued for approximately 300,000 low-income children, spouses and adult children on social assistance (in disability benefit) across Canada.



2. Family Needs and Individual Rights

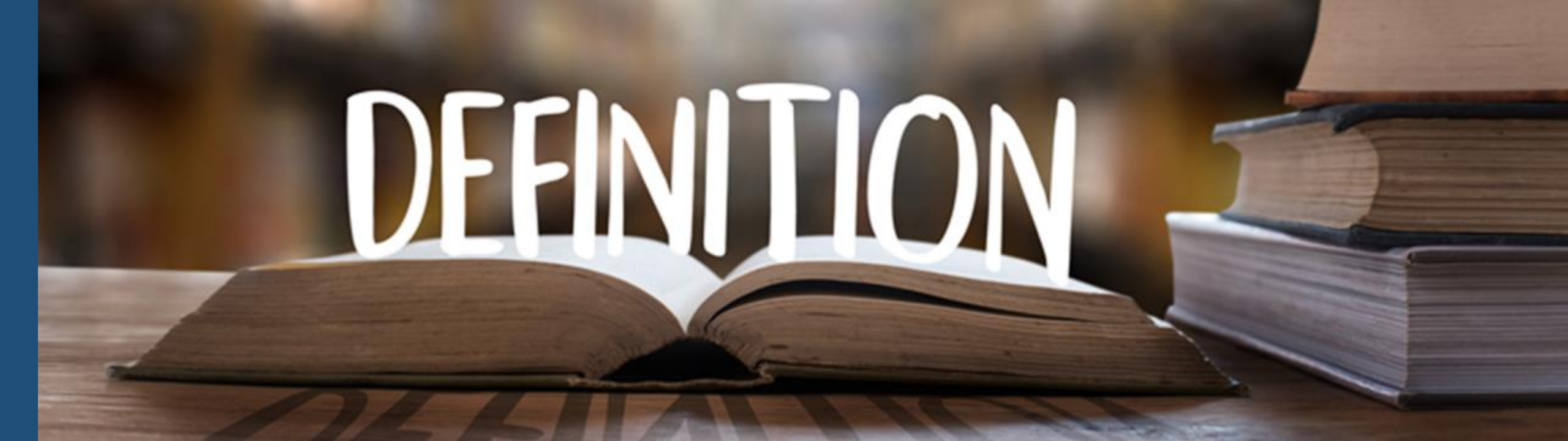
For medium-to-high-income families, spouses and children who benefit from **legally obligated support** from spouses/partners or families with resources may not be in need.

Therefore...

If the CDB adopts a single based benefit unit, payments would be made regardless of the legal obligation to support.

On the other hand...

A single-based benefit unit would contribute to the financial independence of recipients regardless of family income.



DEFINITION

3. Benefit Unit Definition in Canadian disability benefit programs

3. Benefit Unit Definition in Canadian disability benefit programs

- Current 'disability income programs' are based on differing policy principles and therefore have adopted differing definitions of the benefit unit: Single, family and hybrids.
- Accordingly, it is difficult to find direction for the CDB from an examination of existing programs.
- But if it is the case that new disability income programs implemented over the decades have been designed to fill in gaps in coverage and service, it makes sense that an array of single based programs has been complimented by programs aimed at covering family need (see Table 1 on next slide).

3. Benefit Unit Definition in Canadian disability benefit programs

Table 1: Current disability benefit programs and programs' benefit units.

	Disability Benefit Program	Benefit Unit
Federal	CPP	Single
	Veteran Disability Benefits	Single
	CPP Survivors Benefit and War Veterans	Consecutive Hybrid*
	Ei-sickness	Single
	Canada Workers Benefit	Family
	RDSP	Single
	Disability Tax Credit	Single
	GIS	Family
	Personal Income Taxation	Concurrent Hybrid*
Provincial	Workers Compensation	Single + family support
	Ontario Disability Support Program (ODSP)	Family
Private	Disability Insurance	Family

*Consecutive Hybrid: a single benefit unit payment to surviving spouses only starts when a CPP/Veteran benefit recipient passes away.

* Concurrent Hybrid: Canadians are taxed on their individual income while their refundable tax credits are based on family income.



4. Costs of single vs family benefit units for a CDB

4. Costs of single vs family benefit units for a CDB

- A program with a single benefit unit will be more costly than one based on a family benefit unit.
- Without considering family income, the caseloads of CDB recipients will increase as the income of spouses would not be taken into account.
- We have no estimates of the additional costs in this regard.



5. The roles of the federal and provincial / territorial governments

5. The roles of the federal and provincial / territorial governments

- Under Canada's Constitution, it is clear that the provinces have enumerated roles in the implementation of services and supports to persons with disabilities.
- In 1867, there were no income security programs, therefore, income supports to persons with disabilities (or anyone else) were not contemplated.

5. The roles of the federal and provincial / territorial governments

The role of the federal government in income security was clarified in the 1940's with the clarification by the Supreme Court of Canada that the government of Canada can legally spend money in areas of provincial jurisdiction. This is called 'spending power.'

"The federal government is entitled to use its "spending power" to create and deliver social programs. Such programs are permissible even when they involve spending in areas of provincial jurisdiction, such as health or education, as long as they do not amount to regulation of such matters. Conditions on federal spending may be used to influence provincial government policy without amounting to regulation."

[Raj Anand \(2005\)](#), *Legal opinion on MISWAA - Development of New Architecture for Income Security in Canada*. Used with permission

5. The roles of the federal and provincial / territorial governments

- Since 1978, the Canadian government has only mounted new income security programs through the personal income tax system while augmenting other legacy programs through indexation and special increases.
- In 1996, the federal government's National Strategy for the Integration of Persons with Disabilities (1991-96), released its report -- known as the Scott Report.
- The Scott Report recommended a larger role for the federal government in disability policy, and again recommended a national disability act for Canada.



5. The roles of the federal and provincial / territorial governments



- The federal government also implemented the Multilateral Framework for Labour Market Agreements for Persons with Disabilities, resulting in a series of bilateral agreements with provinces in 2003 aimed at promoting employment for people with disabilities.
- The federal government introduced a number of financial measures, such as:
 - the Registered Disability Savings Plan (2006) and the Accessibility Fund (2007),
 - the Tax free Disability Savings Account,
 - the Canada Student Grants for students with Permanent Disabilities, and
 - Caregiver grants and expenses.
- The focus in this period was on economic self-sufficiency, rather than citizenship and inclusion.

5.2 Potential Arguments on Constitutional issues

- It is not known whether Canada will use the personal income tax system to administer the CDB through refundable credits or mount a GIS type special program with a tangential relation with the tax system.
- Certainly, the implementation of a special program outside of the tax system would break a 44-year policy of using the tax system to implement new programs.
- A separately administered CDB outside of any Constitutionally protected delivery route could cause a Constitutional dilemma related to 'spending power'.



5.2 Potential Arguments on Constitutional issues

- The federal government could deliver a CDB program through Service Canada.
- In this way, the federal government would not be required to invent a new administrative structure, hence any “Constitutional dilemma” may be avoided.
- However, Service Canada only delivers constitutionally protected income security programs outside the tax system. That is, CPP, OAS, and EI are each the subject of amendments to Canada’s Constitution (1940, 1951, and 1964).

5.2 Potential Arguments on Constitutional issues



- The requirement to implement a separate program administration to the CDB is compelling, especially given more recent commitments to UN Conventions and the implementation of anti-poverty legislation.

“Since it was written, Canada has ratified the UN Convention on the Rights of Persons with Disabilities, enacted the federal poverty reduction legislation and adopted an official poverty line, as well as passed the Accessible Canada Act. Together, these present a more fulsome and explicit set of commitments and obligations on governments, especially the federal government, for positive action on the standards of living for people with disabilities”.

Email exchange with Michael Prince and Jennifer Robson

***Emphasis: Open Policy**

5.3 Public Administration: the delivery of benefits

- Clearly, a refundable credit administered by the CRA would signal that the hybrid definition of the benefit unit would be the default benefit unit definition: Adjusted Family Net Income (AFNI).
- Equally clearly, the adoption of a GIS model (as it appears to be contemplated in the Preamble to C-35), a family-based benefit unit definition would be the obvious default.



5.3 Public Administration: the delivery of benefits

- Other than the issue with benefit unit definition, CRA as an agency may not have the capability to deliver the CDB benefits.
- It has two major weaknesses:
 - [It] does not collect detailed information in existing and regular within-year reporting systems;
 - An important share of working-age Canadians may not file a return and may not receive the ongoing benefits that the CRA directly administers. (See [Jennifer Robson and Saul Schwarts](#))

“CRA is not well equipped to provide “soft services” to help with complex needs or to provide transparent benefit review. CRA’s best role might be providing information to another government body, rather than taking on a direct role in delivery”.

- [Jennifer Robson & Saul Schwarts \(2021\)](#), Should the Canada Revenue Agency Also Be a Social Benefit Agency? Canadian Tax Journal / Revue fiscale canadienne (2021) 69:1, 87 – 98

5.3 Public Administration: the delivery of benefits

On the other hand, Service Canada may have the ability to deliver the benefit to individuals in their own right:

- Service Canada has been structured to deliver benefits for EI, CPP, and OAS with tax information obtained from CRA.
- It will be equipped with new system to collect real-time income of recipients to decide benefit alternations on time.
- The Social Security Tribunal has better procedural fairness for clients who cannot find or afford a paid representative than CRA tax courts.



“Service Canada is already set up to do benefit delivery for EI, CPP and OAS. They get the tax information from CRA.

“They are also getting a new multi-billion dollar IM/IT system that will finally make it possible, in real time, while on the phone with a client, to look across the benefits a client is entitled to and solve problems/answer questions rather than being siloed.

“They are also, hopefully soon, finally going to get real-time payroll data via CRA, so verifying within-year earnings (except for self-employed) should get a whole lot easier for any benefit aimed at working-age adults.

“If that information pipeline could also gather up provincial IA data and Veterans’ benefits, that would go a long way for administering a new disability benefit.

“And they have the Social Security Tribunal as oversight on their administrative processes and interpretations, while CRA has the tax courts where self-representation is much riskier.”

Email exchange with Jennifer Robson and Michael Prince on August 10, 2021

Accordingly, the choice of delivery mechanism will have an enormous impact on the choice of benefit unit definition.



6. What about existing programs?

Should they change or stay the same?

6. What about existing programs? Should they change or stay the same?

- Canada has 10 major disability income programs and/or systems in place:
 - EI Sickness
 - CPP-D
 - Canada Workers Benefit (CWB)-D
 - Income or social assistance in 10 provinces and 3 territories
 - Veterans Affairs Canada (VAC) disability benefits
 - The RDSP
 - Disability Tax Credits
 - Employer programs – public and private
 - Workers' compensation boards
 - Disability accident insurance

Decisions as to whether the existing programs should change - rely on the eligibility (definition of disability) and the program parameters that will be in place with a new CDB.

6. What about existing programs? Should they change or stay the same?

- If the new CDB acts as a single based benefit top-up to a monthly benefit, then all programs could remain the same and income assistance benefits would perform their extended role in meeting family need.
- However, if a family based benefit unit is chosen, then income assistance (as we know it) could be folded into the CDB if the level of benefits is adequate.
- To some, the latter would be a measure of true reform based on anti-poverty principles while for others favouring GBA+, it might be seen as a clear policy loss.



7. Federal offsets of its own programs

CPP-D and Veterans' Programs

7. Federal offsets of its own programs (CPP-D and Veterans' Programs)

- The news release on [June 22, 2021](#) clearly stated that the CDB would:
 - *“[S]upplement, not replace, existing federal and provincial-territorial supports with a goal of lifting hundreds of thousands of persons with disabilities out of poverty”.*

7. Federal offsets of its own programs (CPP-D and Veterans' Programs)

- Therefore, if a single benefit unit is adopted for the new CDB, CPP-D is largely in accord with a single benefit unit as CPP itself has a single-based benefit unit.
- However, CPP-D and Veterans' Programs also provide family-based benefits. It would be a bad design approach to offset family-based benefits against a single-based benefit.
- Accordingly, any spousal benefits paid by CPP-D and Veterans Affairs Canada should not be offset against the CDB.

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The Decision

- The government of Canada has an important decision to make respecting the benefit unit definition of the CDB.
- It can adopt a single benefit unit approach that supports a GBA+ framework or it can follow the GIS approach that sees family need as paramount.
- It may also possible to design a hybrid model both inside and/or outside the new CDB.



Definitions of the Benefit Unit

Option 1

A Family based Benefit Unit

A Current Example: the
Guaranteed Income
Supplement (GIS)

- A family benefit unit is an amount payable to a recipient based on the people living in the nuclear family. If the recipient has a dependant(s), the family income for the benefit calculation will reduce accordingly.
- The Guaranteed Income Supplement (GIS) was originally introduced in 1967 as a temporary measure to further reduce poverty among seniors.
- Now a permanent program, [the GIS](#):
 - a. is part of the Old Age Security program,
 - b. provides low-income Old Age Security pensioners with additional money, and
 - c. is income-tested: as the amount of income increases, the amount of the supplement decreases

Option 1: A Family based Benefit Unit

Pros

1. Costs less if more recipients are couples with dual incomes;
2. Can be easily integrated with existing programs that apply family benefit units.
3. Meets the family needs of low-income recipients, especially those with dependants.



Cons

1. Causes potential conflicts with the recommendations provided by GBA+ analysis
2. Makes no significant difference to recipients who are single.
3. Does not enhance self-reliance and independence.
4. Would not address issues caused by violence against women (VAW)



Option 2

A Single Benefit Unit

- Amounts would be payable to recipient based on their individual incomes.
- Current examples: EI, CPP, Worker's Compensation



Option 2: A Single Benefit Unit

Pros



1. Enhance economic liberty, self-reliance, independence, and empowerment of marginal groups like low-income women in abusive relationships,
2. In consistent with the 1981 Obstacles Report's recommendations on rights-based omnibus legislation for Canadian disability policies
3. Could trigger clawbacks in existing programs.
4. Recognizes GBA+
5. Mitigates VAW

Cons



1. Do not solve the needs of recipient with dependant(s), (e.g. lone parents and low-income spouses/partners)
 - a. Child benefit can cover the need of children.
 - b. But spouses still have legal responsibilities to support each other.
 - c. To solve the family needs, the new single benefit unit CDB will require Agreement with provinces to treat CDB as a top-up benefit to provincial programs with no clawbacks.
2. Costs more.
3. Generates public debate on whether social programs should support recipients with strong family support.
4. Current Single Benefit Unit programs mostly require employment and contribution. These requirements are in conflicts with the fact that people with disabilities are hard to remain stable in the labour market.

Option 3:

A Hybrid Family & Single Benefit Unit

**Existing Example:
Personal income tax
system, Veteran's Benefits**

- A hybrid (whether concurrent or consecutive) of both family benefit units and single benefit units must provide detailed definition of each situation.
- Amount of contribution and benefit may be decided based on the following two income-tested models:
 - a. (For low-income families) Contribution based on individual incomes while benefits based on family incomes
 - b. (For medium-to-high families) The contribution is based on family income while benefits based on individual income.

Option 3: A Half Family & Half Single Benefit Unit

Pros

1. (Partially) solves the family needs of low-income recipients and recipients with dependant(s).
2. (Partially) enhances the independence of recipients.



Cons

1. Complicated definition of eligibility.
2. Assumption of recipients' employment status (contribution) could disadvantage low-income families and recipients without employment.



Option 4

A choice-based single benefit unit (family income-tested) program

- Allow individual applicants and enrollees to choose or elect family or single benefit unit through application.
 - a) Below a family income threshold, the benefit will be paid to the individual based on its individual's income.
 - a) If the recipients' family incomes exceed certain threshold, a portion (e.g. 20 per cent) of each dollar paid will be kept as benefits in reservoir. Recipient should be permitted to access the saved amount in certain situations, for instance, a forthcoming decrease in total individual income which included family support.

Option 4: A two-fold single benefit unit (family income-tested) program

Pros

1. Offers a solution to the public's debate on whether social programs should support recipients with strong family support.
2. Respects choice



Cons

1. Complicated application process.
2. A system which requires strong monitoring.



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The Target Group

- Bill C-35 establishes “the Canada disability benefit to reduce poverty and to support the financial security of working-age persons with disabilities”.
- According to the [2015 data](#) analyzed by Statistics Canada, among the working-age population with disabilities, lone parents with children or those living alone are more likely to be living in poverty (see also Appendix B).



Definitions of the Benefit Unit

A 'Smart' Hybrid Model

- To move people with disabilities out of poverty, the government should implement a 'smart' hybrid model incorporating all major features of a single based benefit unit while recognizing elements of family need by harmonizing benefits with other disability incomes at the federal, provincial, and territorial levels
- A 'Smart' Hybrid Model should adopt an adequate single benefit unit (options 3 or 4) for the new CDB, while utilizing existing social assistance programs including child benefits and income support to meet the needs of recipients with dependants.



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Appendix A: A brief summary of the differences between a needs-based approach and an individual (rights-based) approach

	Needs-based approaches (NBA)	Rights-based approaches (RBA)
Vulnerability	Vulnerability is addressed as a symptom of poverty or marginalisation.	Vulnerability is seen as a structural issue, both caused by and leading to unequal power relations in society.
Justice	An increase in justice may be achieved as a by-product of meeting needs, but it does not explore the injustices that led to the deprivation in the first place.	Justice is the focus of the efforts. Thus, it tends to challenge traditional, social, cultural and even legal practices and norms that may foster injustice.
Discrimination (e.g. based on gender, creed, caste, economy)	Tends to work with the symptoms of discrimination, rather than causes.	Deals with the causes of discrimination, because it works with the power imbalance between authorities and vulnerable groups that support such discriminations.
Power relations	Does not engage with the issues around the power imbalance between authorities and vulnerable groups. In fact the latter are likely to approach the current power-holders for help, thus unconsciously enhancing their power.	Focuses on addressing the differential power issues that underlie poverty and disadvantage – and tries to re-draw the power equations.
Accountability	In NBA projects, accountability is only in terms of outcomes – so that the funding agency (governmental or non-governmental) is satisfied that funds are used for what was intended.	Works towards ensuring the accountability of the state and other service-providers, and push them to fulfil their obligations to respect the rights of all, especially of marginalised people.
Citizenship	Citizens are perceived as beneficiaries who hopefully enjoy the largesse of the government.	Citizens are seen as significant actors in a democratic state, and so emphasise opening up direct channels of communication
Conflict	The aim is to avoid upheaval and discontent by somehow arranging to satisfy the needs of the community.	By opening up space for expressing demands and multi-way communication among stakeholders, RBAs create possibilities in conflict prevention, although at times they may also function in a conflictual manner. Grievances simmering beneath the surface can be and are brought into open debate for negotiation or challenge.

Appendix B: Household living arrangements of Canadian working-age population with disabilities below Canada's Official Poverty Line

Table 14

Canadian population aged 15 to 64 years below Canada's Official Poverty Line, by selected household living arrangements, disability status and severity, 2015

Position in household	Persons without disabilities	Persons with disabilities	
		Milder	More severe
	percent		
Part of couple, no children	6.2	5.4	14.3
Part of couple, with children	7.0	6.5	14.9
Living with parent(s)/guardian(s)	8.1	11.5	13.6
Lone parent with children	24.2	33.5	40.7
Living alone	21.5	32.7	61.4

Note 1

Those living in a household with others but not part of a Census family are not included in this table because this type of living arrangement encompasses a very wide range of situations, including those living with roommates, extended relatives, or some individuals within multigenerational households.

Source: Statistics Canada, Canadian Survey on Disability, 2017.

Appendix C: Provincial (family) need based programs

Newfoundland and Labrador – Education:

- The Repayment Assistance Plan for Borrowers with a Permanent Disability (RAPPD) allows borrowers to manage their debt by allowing them to pay back what they can reasonably afford. Under this plan no borrower with a permanent disability should have a repayment period longer than 10 years; loan payments are based on family income, ability to pay and disability accommodation costs (e.g. uninsured medical expenses, special care and other expenses); borrowers will not make payments exceeding 20% of their income toward loans covered by RAP-PD; and in certain cases, borrowers may not have to make any loan payments until their income increases.

Prince Edward Island – Income Replacement:

- The Child Care Subsidy Program, under the Act, covers all or part of the cost of child-care and before-and-after-school programs so that parents can work or attend training programs, or because their child has specific needs. The subsidy rate varies, depending on the size of the family, age of children and the household's income.

Appendix C (CONT): Provincial (family) need based programs

Nova Scotia - General Disability

- “The Services for Persons with Disabilities (SPD) Program, under the *Social Assistance Act*, provides financial assistance or support services to persons in need. The SPD program provides a variety of supports to children, youth, and adults with disabilities through residential and at-home support programs. The SPD ranges from supporting families who care for a family member with a disability in their own home, to supporting people with disabilities in a 24- hour residential support option. The SPD Program promotes a participant’s independence, self-reliance, security, and social inclusion.”
- The Flex Individualized Funding program, under the *Social Assistance Act*, provides funding to purchase supports and services specific to the needs of adults with disabilities who live at home with their families, or who live independently with family supports, or a personal support network. The program provides self-directed and self-managed funding to eligible participants.”

Quebec – Employment

- “The *Individual and Family Assistance Act* implements measures, programs and services designed to foster economic and social self-sufficiency, while promoting one’s social integration and supporting entry into the labour market. An individual with a disability can be involved with employment assistance programs and services whether in a regular work environment or in an adapted enterprise.

Ontario – Employment

- The Ontario Works Program, under the *Ontario Works Act*, promotes self-reliance through the provision of effective, integrated employment services and provides temporary financial assistance to those most in need while they satisfy obligations to become and stay employed.
- However, in practice, a recipient’s family income and family needs are also taken into account, particularly when in collaboration with child benefits or when the recipient has dependants:
- “The Canada Disability Savings Grant, under the *Canada Disability Savings Act*, is a matching grant up to 300 percent, depending on the beneficiary’s family income and contribution. The maximum Grant amount is specified under the Act. Grants are paid into the RDSP until the end of 49th years of age.

Thank You

Questions?