

Income and Employment Supports Act

CONSULTATION QUESTIONS FEEDBACK

There are some areas of the proposed regulations where Alberta Human Resources and Employment is seeking feedback and input. Please use this form to provide us with your input.

Income Support, Health and Training Benefits

1. Are there other discretionary benefits we should consider?

Concern: Discretionary benefits should be congruent with the basic necessities as detailed in the Market Basket Measure (MBM). The notion that Albertans will be healthy and that children will be successful at learning requires that the regulations be drafted to include amongst the discretionary benefits the basic necessities as defined by the MBM.

For Example:

In order to promote the independence of families and individuals and encourage participation in training and employment, the benefits paid to persons need to include the capacity to own and maintain a car where public transit is problematic, or disabled or preschool children are involved. For individuals and families this will improve their capacity to provide for their basic needs and allow for more employment options. Additionally, this would allow for increased access to recreational and therapeutic activities for clients and children thereby improving their health and supporting learning and community participation.

Concern: Young adults are supported in learning. The increase in the coverage for dependant children to age 20 is a positive step in supporting families. However, the national average for children leaving home is 24 years. Extending the coverage should the child stay at home and in school until 24 years of age would provide an additional hand up for these young adults and improve their long term career opportunities.

2. Are there changes to the income exemptions we should consider?

Concern: Income exemptions are too low and do not use accepted measures of market cost. The income exemptions for people with blended incomes are arbitrary and too low to support the success of people attempting to leave income support programs. Based on their particular profile and geographical region, each household should be allowed to earn the maximum identified by the MBM before additional earnings are deducted dollar for dollar from their income. As well, this would help to encourage people's increased participation in community activities, enhance their ability to secure safe and more suitable housing, and help families build a financial cushion prior to exiting the program. What is needed is for the province to make a commitment to using the MBM as the primary tool for setting rates and benefits for all social support programs in Alberta.

Concern: Families must be able to keep Child Maintenance payments. In order to promote the healthy development of children, and in the spirit of why maintenance was designed (children not growing up in poverty), families on assistance need to be able to keep maintenance dollars up to the MBM figure for their particular family profile.

3. Are there are other eligibility criteria we should consider for full-time and/or part-time learners?

Concern: Learners facing multiple barriers require more assistance than is currently available. As part of the goal to assisting people to achieve independence, the regulations need to assure that there are extensions available to learners who require more time to be ready for work or post secondary learning. For example, people with literacy or health barriers may need several years of education prior to being ready for employment.

For learners with long term learning goals, such as post secondary training eligibility should be extended and financial supports created to ensure a smooth transition to Alberta Learning programs.

Training Programs and Providers

4. Are there changes we should consider to the conditions for program approvals?

NO COMMENTS

5. Are there changes we should consider for the standards and obligations of training providers?

NO COMMENTS

6. What changes would you suggest for the proposed training provider appeal process?

NO COMMENTS

Child and Adult Support Services

7. Are there groups we should consider including as eligible for Child and Adult Support Services?

Concern: Women leaving abuse should not have support orders enforced. The appeals process should be clear and fair. In order to help ensure that women and children are safe and healthy, all front line support workers must have mandatory training in family violence screening.

For women fleeing abusive relationships, the option to appeal the enforcement of maintenance must be presented each time a women enters the program. As

well, a clear and defined administrative appeal process must be in place to ensure that women and children are not put at risk.

8. Do you have any other comments on the proposed regulations?

In November of 2001, the MLA Committee to Review Low Income Programs released two reports to the public. The first document titled 'What We Heard' detailed the feedback from community and government about the needed changes to welfare programs. The second document titled 'What We Recommend' provided a series of operational recommendations and more importantly five guiding goals and principles.

We believe that in order for the regulations in the IESA to reflect the needs of Albertans, each regulation must be examined against the five core values stated by Alberta Human Resources and Employment.

Goal: Albertans will be independent

- **Concern: The positive impact of the regulations will be limited by Alberta's low minimum wage.** To truly improve the lives and promote independence of people in need, Alberta Human Resources and Employment (AHR&E) must move to increase our minimum wage, which remains the lowest in Canada. As the minimum wage increases, social assistance rates should be adjusted to reflect market costs for goods and services.
- **Concern: Rates for income support programs must increase.** Increasing benefits is a vital step in supporting independence. These rates must be indexed to the cost of living and tied to an accepted measure such as the MBM and reviewed every two years.
- **Concern: Supports for Independence must include adequately funded and high quality support programs.** The regulations need to show a long-term commitment to supporting people to achieve independence by providing effective and sustainable adjunct services. There must also be a commitment to evaluating the quality and accessibility of these support services.
- **Concern: Health Benefits must be extended.** When exiting income support programs an automatic extension of health benefit for two years that includes prescription drug costs, should be provided for ALL clients of the IESA.
- **Concern: Complete childcare subsidy must be extended.** All families leaving income support programs should be automatically provided two years of child care services at a 100 per cent subsidized rate.
- **Concern: Women leaving abuse must be supported.** The institution of damage deposits and start up dollars for women fleeing abuse is a positive step in service delivery for the IESA. These dollars must be sufficient to cover actual costs; use of the MBM figures on costs would assist in setting the rates for these benefits.

Goal: Our workforce will be skilled and productive.

- **Concern: Market Training does not provide for long term employment:** Market geared training provides short term promise of employment. However, in Alberta where the economy is known to boom and bust, individuals must have opportunities to access post secondary education, not only skill development training for entry level work. To break the generational cycle of welfare, people must be provided with opportunities and incentives, like therapeutic counseling and tuition subsidies, to enter into educational programs.
- Skill development requires a thoughtful, comprehensive and person-centered approach. The regulations that allow decisions to be made at the front line are a positive step in reducing institutional rigidity. However, the services must exist to inform and assist people in planning for their future career, and not just immediate employment.
- The notion of 'building block' services as envisioned could provide the framework for this style of increased employability for clients.
- **Concern: For learners with multiple barriers, short-term training is not adequate.** Supports for special health and learning needs must be provided and the timelines for learning programs extended for persons with multiple barriers for up to 40 months. This would be in line with learners who are considered likely to be successful in completing high school equivalency and moving to post secondary programs.
- **Concern: Processes for working with other Ministries are not adequate.** The regulations need to identify clear partnerships between AHR&E, Learning and Health to ensure the success of the proposed model.

Goal: Albertans unable to provide for their basic needs will receive help.

- **Concern: The IESA does not define basic necessities.** The Social Development Act defined basic necessities as: food, clothing shelter, heat, light, water; the things, goods and services authorized by the Director that are essential to health and well being, including essential surgical, medical, optical, dental and other remedial treatment, care and attention, and things, goods, services considered to be basic needs, from time to time, by the Director. We propose the adoption of the MBM, which specifically details the basic necessities and costs of those items in Alberta. This tool provides a universal benchmark of what people need. Using the MBM would help to better define AHR&E's responsibility to clients and is a simpler tool to use in understanding the services available. Use of the MBM would also ensure a clear and fair appeal process.
- **Concern: Albertans need to know what benefits they are eligible for.** The regulations must provide a clear rationale and easy to understand figures and categories for defining benefits. These figures should be reflective of MBM categories and should show actual dollars and budgets for households. These budgets should be easier to understand than in current regulations and should be posted in offices, published in government public education documents and on the web.

Goal: Albertans will be healthy

- **Concern: Health is most influenced by income and social status.** The definition of health as laid out in the discussion guide defines health only in relation to services and health coverage. However, research on the social determinants of health indicates that an improvement in income and social status, as well as participation in community and recreation and social activities strongly influences a person's overall health outcomes. This broader definition of health is a better fit with the goals of the Low Income Review Committee and would allow for regulations to include real opportunities to improve the health of low income Albertans.

Goal: Children will be well cared for, safe, successful at learning, and healthy.

- **Concern: All children need to be home for one year with a care-giving parent.** Currently working parents can access one year of parental leave to care for a newborn infant. This same amount of time should be provided for parents receiving benefits through the IESA programs.
- To ensure healthy child development and improve educational outcomes, the recreation and school allowances should be increased in accordance with MBM figures.
- Existing partnerships between AHR&E, Children's Services and Alberta Learning should be promoted and improved.

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