



**LDAO Response to Discussion Paper 2 of the
Commission for the Review of Social Assistance in Ontario
March 16, 2012**

The Learning Disabilities Association of Ontario (LDAO) and its 20 community based chapters represent the interests of persons with learning disabilities (LDs) throughout Ontario. In the more than forty years since its formation, LDAO has expanded its activities and services to include youth and adults who have learning disabilities, in postsecondary and employment sectors, in addition to children and families.

Persons with learning disabilities, of all ages, represent the largest disability group in Ontario. For example, in the publically funded school system, students with LDs have made up over 40% of students receiving special education. Learning disabilities influence all areas of a person's life, including education, mental health, employment success, the need for social assistance, and in some cases contact with the justice system. However, with the right accommodations and supports, the many persons with LDs can become among the most creative and productive members of society.

LDAO welcomes the opportunity to comment on issues raised in **Discussion Paper 2 of the Commission for the Review of Social Assistance in Ontario.**

Chapter 1: Reasonable Expectations and Necessary Supports to Employment

Features of Effective Services and Supports

Discussion Paper

The Discussion Paper states, "Some Ontario Works administrators are using assessment tools to identify where people are in the continuum of preparing for and finding employment. Using those tools, a client may be identified as, for example, job-ready, in need of pre-employment training, skills development, or education upgrading, and so on. Other jurisdictions use assessment tools to measure jobseekers' level of "disadvantage" in the labour market and to refer people, including people with disabilities, to the most appropriate employment services.

Assessment tools can be particularly important in identifying people who may be facing multiple barriers to employment and requiring more intensive supports to stabilize their lives, or address mental health, addictions, or other issues before preparing for employment." (p. 5-6)

The Discussion Paper further states that "*the Commission is seeking input on whether Ontario should adopt a means to better assess work capacity and set participation requirements for people with some capacity for employment, or whether the Province should wait to introduce such requirements until substantial progress has been made on removing barriers to employment for people with disabilities, including the full implementation of the AODA.*" (p.11)

LDAO Response

The use of standard assessment tools and the concept of assessing for 'work capacity' can be fraught with difficulties for individuals with LDs. Learning disabilities are complex, and some of the difficulties they cause are not easy to evaluate without professional assessment. For example, some individuals with nonverbal learning disabilities may have strong verbal and rote academic skills, but be much more impaired than is evident. Also, there are many individuals with mental health difficulties that complicate their ability to compensate for their LDs. Simple checklists or other standard tools used by service providers would not be sensitive enough to evaluate 'work capacity' in most individuals with LDs.

For the same reasons, "*standard assessment tools to identify people's needs and match them to appropriate services and supports*" (p.13) are not likely to be sensitive enough to the complexities of learning disabilities, without psychoeducational/psychovocational assessment to determine the individual profile of strengths and areas of weakness.

Discussion Paper

The Discussion Paper states "*Our discussions and research suggest that post-employment supports can be effective in helping some clients retain employment, particularly people with disabilities or multiple barriers and newcomers who lack familiarity with the Canadian work environment. Post-employment supports could mean continued access to employment service providers for a period of time after starting a job. These supports could help clients adjust to and succeed in the workplace, and to access social supports, such as housing or childcare, which are critical to long-term employment retention.*" (p.7)

LDAO Response

Post-employment supports could be very helpful for many individuals with learning disabilities. Research shows that they have more difficulties with keeping jobs than with finding jobs. Assistance with accommodation or job coaching can be useful, as long as service providers are knowledgeable about the complexity of LDs, and sufficient time is allowed for continuation of job coaching.

Access to Employment Services and Supports

Discussion Paper

The Discussion Paper proposes three different approaches to improving coordination or integration of employment services:

- a) *Improved Provincial-Municipal/First Nations collaboration*
- b) *Municipalities/First Nations deliver all employment services*
- c) *Employment Ontario delivers all employment services*

The Discussion Paper asks "*Which approach would be most effective in improving the delivery of employment services?*" (p.17)

LDAO Response

For individuals with LDs, which level of government provides the employment services and supports is not as important as the requirement that incentives be in place to provide the intensive supports needed by individuals with complex needs. Whichever delivery approach is chosen, we agree that "*it would be important to ensure that the specialized or intensive services that some social assistance recipients need would be available.*" (p.17). The current funding mechanisms for ODSP Employment Supports create a disincentive to service providers to work

with individuals who have complex needs and are not easy to make 'job ready'. It also gives incentive to set employment goals for clients that are easiest to meet, but not necessarily appropriate to the individual. For individuals with LDs, the correct 'job fit' is vital to job retention.

Chapter 2: Appropriate Benefit Structure

Designing Benefits for People with Disabilities

Discussion Paper

The Discussion Paper suggests developing a new program *"to provide a secure and adequate basic income for people with severe disabilities who are unlikely to generate significant earnings over their lifetimes"* (p.31) and asks, *"Should there be a separate basic income program for people with severe disabilities who are unlikely to generate significant earnings?"*

LDAO Response

Such an approach would be very difficult to implement fairly. Aside from the changeability of disability and the issue of episodic disabilities, there are the concerns we raised earlier about trying to assess 'work capacity' in individuals with complex disabilities or co-occurring disabilities.

Discussion Paper

The Discussion Paper states that *"for low-income people with disabilities, the cost of purchasing certain assistive devices is covered through the Ministry of Health and Long-Term Care's cost-based Assistive Devices Program."*(p.30)

LDAO Response

LDAO would like to point out that individuals with learning disabilities, who do not have a co-occurring physical disability, are not eligible for the Assistive Devices Program through MHLTC. This is an inherent inequity in the system, since many individuals with LDs need to use specialized computer-based programs that they cannot afford.

Chapter 3: Easier to Understand

Complexity, Compliance and Risk Management

Discussion Paper

The Discussion Paper states *"An effective audit-based approach should produce the same level of compliance as the surveillance approach. The advantage of an audit-based system is that it can more efficiently focus administrative resources on high-risk situations, potentially freeing up resources to improve direct supports to people. The majority of social assistance recipients do not misuse the system, and this approach also has the advantage of treating them with a higher level of dignity and trust."*

The Discussion Paper asks *"Should the social assistance system move from a surveillance approach toward an audit-based system of verification and monitoring?"*

LDAO Response

LDAO agrees that the audit-based approach could benefit the majority of social assistance recipients who do not misuse the system, and could reduce some of the complexities that confuse recipients.

Chapter 4: Viable over the Long Term

Discussion Paper

The Discussion Paper sets out three approaches to improving integration and delivery to help achieve long-term viability:

- *One approach could be to continue with the current model of separate delivery of Ontario Works and ODSP income support, while integrating employment services and supports for everyone receiving social assistance.*
- *A second approach could be to provide employment services and income support through a one-stop delivery model that would integrate Ontario Works and ODSP at the local level.*
- *A third approach could be for municipalities to deliver human services components of social assistance, including case management and employment services, while the Province delivers administrative services related to social assistance, such as issuing social assistance cheques.*

The Discussion Paper further states that *“Any new approach must be consistent with other areas of social assistance reform and must ensure equitable access to services and supports for all individuals, including people with disabilities.”* (p.43)

The Discussion Paper asks, *“What are the strengths and weaknesses of these three approaches to the delivery of Ontario Works and ODSP?”*

LDAO Response

For individuals with learning disabilities, there could be a danger that integration of services provided through OW and ODSP would dilute the specialized employment support services that they require. However, it is extremely difficult for many individuals with LDs to qualify for ODSP Income support, and many of those who do not qualify cannot access ODSP Employment Supports because they are on OW income support. Integration of services could potentially help these individuals, as long as they can access the specialized or intensive employment supports and services they need.

Conclusion

Although the majority of youth and adults with learning disabilities do not need ongoing income support, there are many with identified and unidentified learning disabilities (LDs) who struggle with employment issues and end up participating in Ontario Works or Ontario Disability Support Programs. Therefore the Learning Disabilities Association of Ontario appreciates this opportunity to point out areas where the changes contemplated in Discussion Paper 2 could affect persons with learning disabilities.