# **Developing a new Poverty Reduction Strategy for Ontario**

# **CNIB Consultation Response – March 2020**

## **Introduction**

We welcome the opportunity to respond to the government's consultation on developing a new Poverty Reduction Strategy for Ontario. There are approximately 681,000 Ontarians living with sight loss. According to Statistics Canada's 2017 Canadian Survey on Disability, 22 per cent of Canadians living with severe or very severe sight loss are low income according to the Market Basket Measure (MBM),[[1]](#footnote-1) compared to 8.7 per cent for the general population.

Our response to this consultation recognizes there are many complex socio-economic factors that can contribute to a person with sight loss experiencing poverty, such as their sexual orientation, race, and gender. While we take an intersectional approach in our work, for the purposes of this submission, our primary focus will be to explore the issues as they affect the sight loss community specifically. Furthermore, we endorse the expertise of people with lived experience and equity-seeking organizations that intersect with disability and sight loss.

Our response highlights issues that can be solved by policy intervention under the purview of the provincial government. Based on our research and experience working with people who have lived experience sight loss and poverty, these issues are recurring for members of the community we serve, but it is not a comprehensive list of how poverty affects Ontarians who are blind or partially sighted.

## **Background: Sight loss and Poverty**

* The unemployment rate for people who are blind or partially sighted in Canada is three times the national average (16 per cent vs. 6 per cent).
* The average household income for working-age Canadians who are blind or partially sighted is two-thirds the national average for the general population ($46,200 vs. $70,300).
* Almost half (46 per cent) of those not looking for work indicated it was because they are on disability assistance. (CNIB International Levels of Employment Study (ILES, 2018)

## **Area 1: Encouraging job creation and connecting people to employment**

### **Education**

* It is estimated there are approximately 1,500 to 2,000 students in Ontario who are blind or partially sighted.
* The overall high school graduation rate for people with sight loss is 75 per cent.
* According to Statistics Canada's 2017 Canadian Survey on Disability, the levels of low income using the MBM are 27 per cent of people with sight loss who did not graduate high school, 23 per cent of those who have graduated high school and 15 per cent of those who graduated from a post-secondary education.

**Background**

* Teachers of the Visually Impaired (TVIs) are integral in making educational content accessible and teaching the Expanded Core Curriculum to students with sight loss. There are nearly 600 teachers who have completed some TVI training, and more than 250 fully qualified Specialist Teachers of the Blind. The supply is there, but school boards are hiring less qualified candidates or generalists who cannot adequately support students with sight loss, particularly braille users.
* There is no consistent access to assistive technology through the Special Equipment Amount (SEA). School boards across the province have contracts with various technology vendors, which requires students to use technology that might not be the most effective. School boards also continue to purchase classroom technologies or standardized test materials that aren't accessible.
* Parents don't have access to an impartial organization outside of the school board when their children aren't being fully accommodated at school. This leads to parents filing Human Rights Complaints, when it could be dealt with in a less bureaucratic and combative manner.
* Employers often don't know how to accommodate a student's disability for co-ops or internship placements or may be unwilling because of unfounded "health and safety" concerns based on social assumptions about disability. This means the student ends up being heavily restricted in their placement options, or they're not able to participate in the co-op/internship at all. This lack of vocational experience puts students with sight loss at a major disadvantage when they are ready to enter the workforce.

**Recommendations**

* The Ministry of Education should adopt the National Standards of Education for Students who are Blind or Visually Impaired, which provides a guideline for navigating the supports available both within and outside of the school system. The National Standards were developed by people who work with students who are blind or partially sighted.
* Improve hiring practices and standards for Teachers of the Visually Impaired (TVIs). The CNIB Foundation is working with the Ontario College of Teachers to develop and implement practical solutions to raising professional standards, such as facilitating a practical hands-on component to the Additional Qualification. The Ministry of Education can support this work by looking at board hiring practices in relation to TVIs and ensure Specialists are getting into the school system, as well as explore other options for professional accreditation such as a diploma or degree.
* Ensure standardized access to assistive technology in the education system through centralized procurement. The school boards' business contracts should not prevent students with sight loss from receiving the accessible technology that's required for their education. Additionally, as mentioned in the Ontario government's report "Managing Transformation: A Modernization Action Plan for Ontario", standardization of procurement practices drives efficiencies. The Ministry and school boards should have procurement practices whereby they will only purchase technology or materials that are accessible.
* The Ministry should have a dispute resolution mechanism independent of the school board. This will provide parents with an impartial resolution process to follow when their children aren't being fully accommodated.
* Employers should be incentivized to employ a student intern with a disability via an accommodation fund. Schools and school boards also need to partner with sight loss organizations and experts to provide workplace assessments and accommodations for co-op placements to fully support students – it will provide a seamless process for the employer and employee.

### **Employment**

* The unemployment rate for persons with sight loss is triplethe Canadian general unemployment rate. Despite the relative ease of making the workplace accessible for people with sight loss, a lack of workplace accommodations is a major barrier to participating in the workforce. According to Statistics Canada's Survey on Disability, 58 per cent of people with a seeing disability reported having all their needs met, 22 per cent reported having some of these needs met, while 19 per cent reported having none of these needs met.

**Background**

* Many employers, especially small and medium businesses have identified difficulty with time, cost and knowledge about the coordination of accessible workplace accommodations for people with sight loss. This can lead to the job offer falling through or the employee having to leave their new role because they do not have the accessible tools to do the job effectively.
* Similarly, long-standing employees who experience a change in their sight and accommodation needs become at risk of losing their job the accommodation process in unclear.

**Recommendations**

* Streamline the process of coordinating of accessible services and workplace accommodations for job seekers with sight loss through the CNIB's Come to Work program. We are currently collaborating with employment agencies across the province, and complement the services they offer by:
  + Assisting employment agencies, employers and individuals to identify and coordinate workplace accommodations for people with sight loss
  + Collaborating with community employment agencies to ensure their services are accessible
  + Connecting agencies, employers and individuals with sight loss to assessments for workplace assistive devices and aids
  + Providing oversight and ensuring a smooth process from the onset of onboarding through to a person's probationary period
* Build knowledge about accommodations and accessibility for employers who are inexperienced with hiring people with disabilities by embedding CNIB's Come to Work program into the Employment Ontario grants for job shadowing and short internships. This mutually benefits employers and job seekers while ensuring both parties know how to access workplace accommodation services.

## **Area 2: Providing people with the right supports and services**

### **Housing**

While CNIB is not a housing provider, we understand the struggles people face in trying to secure affordable, safe and long-term housing. This is especially exacerbated in geographical areas where there is a competitive rental market, low vacancy rates, and when a person's options are further diminished due to a lack of accessible housing, landlord prejudice or discrimination

We have been working in partnership with individual housing providers, shelters and municipal governments in order to address these issues when they arise on the local level, but the systemic issues need to be addressed by the provincial government, so there is consistency in all areas of Ontario.

**Background**

* The Shelter Allowance for the Ontario Disability Support Program (ODSP) does not realistically reflect or cover the costs of renting in today's market, particularly in urban areas.
* We have seen landlords or property owners refusing to rent to someone because of their sight loss, often citing unfounded safety concerns such as the prospective tenant could fall down the stairs or set the building on fire if they cannot see. With the right post-vision loss rehabilitation training, a person with who is blind or partially sighted can live independently. While a person could put forward a legal challenge if denied housing due to disability discrimination as a longer-term strategy, they still need to secure a place to live in the short term.
* People with sight loss who are living in the shelter system also face additional barriers due to their sight loss. People have reported feeling vulnerable and targeted for theft or violence, and we have known people to be turned away from shelters because the staff do not feel it is safe for them to stay there. We have also heard of cases where people have been turned away from shelters because they were told the shelter is "not accessible".

**Recommendations**

* Increase the ODSP Shelter Allowance to be more in line with the rental market and based on geography, in order to give people a realistic chance of finding somewhere to live within their budget.
* Introduce mandatory training for landlords, transitional housing and shelter workers that include accessibility awareness and anti-discrimination laws, and provide a mechanism where people can report landlord discrimination, so it can be investigated in a timely manner and does not put the burden on the individual to go through an often lengthy and complicated Human Rights process.
* As a vulnerable population, particularly when in the shelter system, prioritize people with disabilities, including sight loss, for housing lists.
* Create a service funding model like the housing support model of Developmental Services Ontario to provide emergency shelter to people who are blind.
* Provide incentives to housing developers to create inclusionary housing programs and units. Full accessibility is beyond wheelchair mobility and ramps. Some people who are blind or partially sighted may not require an adapted or designated accessible unit, and consulting with stakeholder groups for all disabilities will help create fully inclusive housing.

## **Area 3: Lowering the cost of living and making life more affordable**

## **Measuring low-income for seniors**

When a low-income senior in Ontario turns 65, they are no longer eligible to receive income support from Ontario Works (OW) or the Ontario Disability Support Program (ODSP). Instead, low-income seniors begin to collect other supports such as Old Age Security (OAS). Consequently, low-income seniors who benefit from programs such as the Guide Dog Benefit or Assistive Devices Program while in receipt of OW or ODSP are left without support when they turn 65 because they are no longer eligible for support. Programs such as the Guide Dog Benefit or the Assistive Devices Program are integral to combatting isolation, increasing independence, and making the world more accessible to low-income seniors living with sight loss.

### **Guide Dog Benefit**

### Ontario Disability Support Program (ODSP) recipients partnered with guide dogs are eligible for the [Guide Dog Benefit](https://www.mcss.gov.on.ca/en/mcss/programs/social/directives/odsp/is/9_9_ODSP_ISDirectives.aspx), a supplement of $84 a month to assist with general expenses such as dog food and supplies. In 2016-17, there were 402 ODSP recipients who received the Guide Dog Benefit.

### **Assistive Devices Program**

* + The Assistive Devices Program is a lifeline because it covers 75 per cent of the cost of eligible assistive devices for Ontarians living with disabilities, and ODSP covers the 25 per cent funding shortfall not covered by ADP. Low-income seniors who require an assistive device have no equivalent funding opportunities. Therefore, they are left to find the remaining amount for their assistive device.

## **Recommendations**

The government should establish a consistent measurement of low income for seniors as a way of determining eligibility for programs, as it has done with the Ontario Seniors Dental Care Program. This should be adopted consistently throughout government and be used as a mechanism to provide supports to seniors who need it the most, such as providing equitable financial support through the Guide Dog Benefit and Assistive Devices Programs for people over 65.

**Contact:**

Kat Clarke

Manager, Advocacy and Government Affairs (Ontario and Quebec)

CNIB Foundation

Email: [Kat.Clarke@cnib.ca](mailto:kat.clarke@cnib.ca)

1. The Market Basket Measure is a measure of low income based on the cost of a specific basket of goods and services representing a moderate, basic standard of living. [↑](#footnote-ref-1)