

# Submission to the Select Standing Committee on Finance and Government Services for the 2022 Budget



## Invest in Inclusion

Overcoming systemic delays in supports for children,  
youth, and adults with intellectual disabilities.

## Territorial & Land Acknowledgment

Inclusion BC would like to acknowledge that our head office is located in the traditional, ancestral, and unceded territory of the QayQayt First Nation, and that our staff and board members live and work in the unceded territories of Indigenous Nations across the province.

We recognize and support the inherent Indigenous rights and titles throughout the province of British Columbia, the implementation of the UN Declaration on the Rights of Indigenous Peoples, the 94 calls to action by the Truth and Reconciliation Commission, and the British Columbian Declaration on the Rights of Indigenous Peoples Act.

## About Inclusion BC

We are a non-profit federation working with our partners to build community and enhance the lives of children, youth, and adults with intellectual and developmental disabilities, and their families. We do this by supporting people's abilities, promoting positive action, and advocating for rights, responsibilities, and social justice. We are supported by a membership of individuals, families, and 61-member organizations who are working together to build inclusive communities across our province.

## Our vision is a world where everybody belongs.

Inclusion BC appreciates the opportunity to provide a submission to the Select Standing Committee on Finance and Government Services.

The UN Convention on the Rights of Persons with Disabilities (UNCRPD) establishes concrete thresholds and expectations so that people with disabilities can exercise their full citizenship. Well over a decade in, we are not faring well as a country or province despite our collective wealth. One of the contributing factors to our collective inability to meet the needs of people with disabilities lies in the information we collect or the lack thereof.

## UNCRPD Article 31 – Statistics and data collection

1. States Parties undertake to collect appropriate information, including statistical and research data, to enable them to formulate and implement policies to give effect to the present Convention. The process of collecting and maintaining this information shall:
  - a. Comply with legally established safeguards, including legislation on data protection to ensure confidentiality and respect for the privacy of persons with disabilities;
  - b. Comply with internationally accepted norms to protect human rights and fundamental freedoms and ethical principles in the collection and use of statistics.
2. The information collected in accordance with this article shall be disaggregated, as appropriate, and used to help assess the implementation of States Parties' obligations under the present Convention and to identify and address the barriers faced by persons with disabilities in exercising their rights.
3. States Parties shall assume responsibility for the dissemination of these statistics and ensure their accessibility to persons with disabilities and others.

As a province, we have mostly decentralized this responsibility to regional bodies. People across all levels of our system - from the early years to their senior years - spend years of their lives waiting for essential supports and services without much notice, attention, or accountability. Accurate data collection and its use for the adequate review of policies and the corresponding allocation of resources are critically needed.

## Recommendation

1. We recommend the Province of BC invest in a coordinated approach to collecting provincial-level data (particularly within the funding Ministries of Children and Family, Child Care, Education, Social Development and Poverty Reduction, Health, and the Ministry responsible for Housing) and disseminate statistics to help assess if people's support needs are being met in our province and to guide sufficient investment.

Guided by the UNCRPD, the remainder of this submission identifies the most critical funding gaps currently preventing the full inclusion of people with intellectual and developmental disabilities and

their families in B.C. In alignment with our first overarching recommendation, each section references areas where appropriate data collection is needed. The full scope of funding needs is not represented in this submission. Instead, we are focusing our requests on the most urgent needs for investment in the 2022 budget year.

## UNCRPD Article 7 – Children with disabilities

1. States Parties shall take all necessary measures to ensure the full enjoyment by children with disabilities of all human rights and fundamental freedoms on an equal basis with other children.
2. In all actions concerning children with disabilities, the best interests of the child shall be a primary consideration.
3. States Parties shall ensure that children with disabilities have the right to express their views freely on all matters affecting them, their views being given due weight in accordance with their age and maturity, on an equal basis with other children, and to be provided with disability and age-appropriate assistance to realize that right.

It is encouraging the level of consensus that has been reached at the national and provincial levels on the importance of access to child care for children, families, and our economy. The federal and provincial investments have raised the hopes of families to access and afford child care for their children. Nevertheless, families with children with disabilities and various additional support needs remain doubtful that this benefit includes them and their children. These critical investments need to be disability-inclusive and explicit on how they will also support this group of families.

There are long waitlists across our province for children who need Early Intervention Therapies and Supported Child Development services. There is no formal provincial mechanism for tracking wait times. Our local member organizations deal with these waitlists every day; the funding allocations for Early Intervention Therapies have not been updated since 2008. Unfortunately, many children wait so long for critical early supports that they do not get it at all. By the time children get to the top of the waitlist they are no longer eligible due to their age. In effect, this delay becomes a denial of service and children do not get the essential supports they need to succeed in school and in life.

Additionally, assessments are critical to open the door for supports that children with disabilities need to participate in child care and early childhood education along with their peers. Because of lengthy

waitlists for assessments, children who receive late referrals often go unsupported upon entry into kindergarten making the transition for the child, parents, and educators unnecessarily complicated and stressful. Many families are not able to access early intervention services at all. The supply of service simply cannot keep up with the demand and families get only the minimum service during the waiting period.

Due to lack of funding, families may experience interruptions in service delivery with each transition which can negatively affect their child's developmental outcome. For example, a child who receives Supported Child Development Program (SCDP) support to attend preschool may be placed on a waitlist for out-of-school care at their neighbourhood elementary school which may result in cross-boundary school enrollment. For youth with disabilities ages 12+, out-of-school care ensures that working parents have a needed child care option and provides recreational opportunities and social inclusion. Since the organizations are instructed to prioritize younger children, youth with disabilities 12+ who can't be left on their own, are rarely able to access supported after-school care.

Adequate funding for the Supported Child Development Program is vital to the success of universal child care in BC. Incorporating inclusive practices as central standards and offering training opportunities for childcare teams can raise our foundation for support, and the system could be genuinely universal, if and only if waitlists are eliminated for children who require extra support. Their supports should be built into the system from the beginning.

## Recommendation

2. Eliminating waitlists to Supported Child Development Program with a funding increase of \$50 million per year for the next three years.
3. Expand access to Early Intervention Therapies with a funding increase of \$20 million per year for the next three years.
4. Eliminate waitlist for assessments by making a targeted allocation of funding.

Community-based respite has been a foundational support to families eligible for Children and Youth with Support Needs (CYSN) programs for over 30 years. Respite provides the necessary breaks for a caregiver to take care of themselves which in turn supports family resilience. Often, this is the only support available for families, outside of school, for children over five years old. In the last several years, only families in crisis or families experiencing significant challenges have been able to use this service.

Respite is repeatedly referenced as vital in the discussions about the CYSN Framework, yet, there is little evidence of investment or action to ensure the service is made available to all eligible families. Increasing the funding allocation to respite services and collecting data to have an accurate notion of the number of families on the waitlist are necessary to respond to families' needs.

Additionally, it has been increasingly difficult to recruit respite providers given the level of compensation approved by the Ministry of Children and Family Development. The compensation rates for respite providers need to be competitive and, in many cases, respond to the skill level required to support complex children.

The importance of respite to prevent crises is constantly emphasized, however, access to it is driven by crisis. Only when families are at a breaking point is when they are being able to get some funds in the short term; no sustained services are available. All eligible families should have access to respite and they must not face years of waiting.

## Recommendation

5. Targeted fund within CYSN to support families' need for respite services in a competitive employment market.

Since 2019, the Ministry of Children and Family Development has been working on the development of the Service Framework for Children and Youth with Support Needs (CYSN). While it is encouraging the changes that this framework might bring, it is of critical importance to fund it adequately to meet the needs of children and youth with support needs and their families, at updated costs for services.

Inclusion BC has built a robust and community-based foundation for collaborative, evidence-based solutions. We want to work in partnership with the provincial government to address the systemic challenges that children and youth with support needs face when accessing B.C.'s system of supports and services. The solutions include developing more effective approaches to identifying needs, making it easier for families to access supports, clarifying policy mandates, and effectively targeting available funding to ensure the best outcomes for our vulnerable children and youth.

Working with the BC Representative of Children and Youth and multiple community partners, we have been explaining the ways in which the current CYSN program is not meeting the needs of children with support needs and their families. Using current research, surveys, and families' stories, we captured the supports that are needed in the report [Left Out: Children and youth with special](#)

[needs in the pandemic](#). The challenges are not a result of the pandemic, families have been in crisis since before the pandemic and this exacerbated their situation exposing the deep fractures and scarcity in which this system has been left for too many years. Reallocating the current level of funding will not suffice.

Increased investment with clear transparency measures in its allocation is imperative. The ongoing negligence and denial of investment in CYSN has left families feeling invisible and ignored. This should not be allowed to continue.

## Recommendation

6. Increase the funding for Children and Youth with Support Needs to match actual costs of supports and services that children and youth require.
7. Ensure the successful implementation of the CYSN Service Framework by establishing a targeted fund.

### UNCRPD Article 24 – Education

1. States Parties recognize the right of persons with disabilities to education. With a view to realizing this right without discrimination and on the basis of equal opportunity, States Parties shall ensure an inclusive education system at all levels and lifelong learning directed to:
  - a. The full development of human potential and sense of dignity and self-worth, and the strengthening of respect for human rights, fundamental freedoms and human diversity;
  - b. The development by persons with disabilities of their personality, talents and creativity, as well as their mental and physical abilities, to their fullest potential;
  - c. Enabling persons with disabilities to participate effectively in a free society.
2. In realizing this right, States Parties shall ensure that:
  - a. Persons with disabilities are not excluded from the general education system on the basis of disability, and that children with disabilities are not excluded from free and compulsory primary education, or from secondary education, on the basis of disability;
  - b. Persons with disabilities can access an inclusive, quality and free primary education and secondary education on an equal basis with others in the communities in which they live;

- c. Reasonable accommodation of the individual's requirements is provided;
  - d. Persons with disabilities receive the support required, within the general education system, to facilitate their effective education;
  - e. Effective individualized support measures are provided in environments that maximize academic and social development, consistent with the goal of full inclusion.
3. States Parties shall enable persons with disabilities to learn life and social development skills to facilitate their full and equal participation in education and as members of the community. To this end, States Parties shall take appropriate measures, including:
  - a. Facilitating the learning of Braille, alternative script, augmentative and alternative modes, means and formats of communication and orientation and mobility skills, and facilitating peer support and mentoring;
  - b. Facilitating the learning of sign language and the promotion of the linguistic identity of the deaf community;
  - c. Ensuring that the education of persons, and in particular children, who are blind, deaf or deafblind, is delivered in the most appropriate languages and modes and means of communication for the individual, and in environments which maximize academic and social development.
4. In order to help ensure the realization of this right, States Parties shall take appropriate measures to employ teachers, including teachers with disabilities, who are qualified in sign language and/or Braille, and to train professionals and staff who work at all levels of education. Such training shall incorporate disability awareness and the use of appropriate augmentative and alternative modes, means and formats of communication, educational techniques and materials to support persons with disabilities.
5. States Parties shall ensure that persons with disabilities are able to access general tertiary education, vocational training, adult education and lifelong learning without discrimination and on an equal basis with others. To this end, States Parties shall ensure that reasonable accommodation is provided to persons with disabilities.

Inclusive education is a right that Canada has recognized for persons with disabilities by adopting the UNCRPD. The Convention expects countries to realize this right without discrimination and on the basis of equal opportunity. BC's Special Education Services: A Manual of Policies, Procedures and Guidelines

declares that all students should have equitable access to learning, opportunities for achievement, and the pursuit of excellence in all aspects of their educational programs.

Even though the Ministry of Education has strived to advance inclusive education by setting guidelines and expectations for school districts, the complexity of our K-12 delivery structures has hindered the potential that policies could have in advancing equitable access to education for all students. [Funding of education in BC](#) is at an alarmingly low amount compared to other provinces and territories and we need to ensure that all students have equal opportunity to develop their potential by providing the supports they need. [Research](#) continues to demonstrate that diverse and inclusive classrooms benefit all learners which, as a consequence, sets the basis for an inclusive society.

Educators can better create supportive learning environments when they understand the learning needs of their students. Various levels of assessments can provide insight into the strategies that would allow them to engage and meet their students where they are at and advance their learning. Families and caregivers constantly hear from school districts that there is not enough funding to do all the assessments needed and waitlists are years long. They are suggested to get a private assessment which can cost up to four thousand dollars. Quality public education cannot depend on families having to pay for private assessments; this is generating significant inequities for learners whose families cannot afford a private assessment. To be able to quantify and deliver the real level of support needed, it is necessary to make a targeted investment to eliminate waitlists for educational assessments.

The shift to online models of delivery for Provincial Outreach Programs opened the possibility of reaching further and farther in the province. The knowledge and expertise that these programs can add to school district teams strengthen them to support inclusive learning communities in classrooms. With their current size, their teams are not able to meet the demand for support needed in school districts across the province. Expanding their funding and mandate would support the inclusion of some of the most complex learners in their community school.

The implementation of the recommendations from the Independent Funding Model Review has not been a priority due to the ongoing pandemic and the need to respond to immediate health concerns. While the current funding structure continues to need serious review and updates, it is the framework we currently have to work with. The funding allocation for diverse learners ([Level 1, 2 and 3 supplemental funding](#)) does not provide enough resources for school teams to deliver the level of support needed with the expected quality. This is an avenue for an immediate response while the updated Inclusive Education Policy and funding model overcome the internal approval processes.

[Community surveys](#), in the absence of provincial data, show many families of diverse learners have (or are considering) pulling their children from their neighbourhood school because their educational needs are not being met. This trend is eroding our inclusive education system.

## Recommendation

8. Eliminate waitlists for educational assessments by establishing a targeted fund.
9. Expand the funding and mandate of Provincial Outreach Programs to allow parents and educators to initiate support requests and increase their capacity to support more students.
10. Increase the funding allocation for diverse learners (Level 1, 2 and 3 supplemental funding) by 25% for the next three years.

### UNCRPD Article 19 – Living independently and being included in the community

1. States Parties to the present Convention recognize the equal right of all persons with disabilities to live in the community, with choices equal to others, and shall take effective and appropriate measures to facilitate full enjoyment by persons with disabilities of this right and their full inclusion and participation in the community, including by ensuring that:
  - a. Persons with disabilities have the opportunity to choose their place of residence and where and with whom they live on an equal basis with others and are not obliged to live in a particular living arrangement;
  - b. Persons with disabilities have access to a range of in-home, residential and other community support services, including personal assistance necessary to support living and inclusion in the community, and to prevent isolation or segregation from the community;
  - c. Community services and facilities for the general population are available on an equal basis to persons with disabilities and are responsive to their needs.

Inclusion BC continues to be encouraged by the leadership that our province has shown in supports for adults with intellectual and developmental disabilities. With the strides made, we have opportunities to address topics that continue to present significant challenges to adults and their families.

Of particular importance is the transition to adult services. Families have constantly emphasized to us that the Guide for Support Allocation (GSA) tool used to assess the level of needs and allocate support, does not reflect the true support needed by transitioning youth to achieve a good life and thrive in the community. We continue to be deeply concerned about Community Living BC (CLBC)'s limited financial capacity to meet the needs of youth with intellectual and developmental disabilities and their families across BC. If the assessment tool does not provide accurate information about a person's actual needs, the data used to inform budget allocations is inaccurate and is limiting the possibility of doing true person-centred planning. Inclusion BC strongly encourages the government to fund the development of more comprehensive tool(s) to assess the needs and allocate supports for adults served by CLBC.

## Recommendation

11. Fund the development of a more comprehensive tool to assess the needs and allocate supports for people eligible for CLBC services.

People with intellectual and developmental disabilities want and deserve the same housing choices as everyone else. Unfortunately, they face enormous barriers in finding a home that is affordable, safe and inclusive. Costs and ableist assumptions limit or eliminate options to live in the community. While the collaborations continue to create more [inclusive housing](#) options, immediate solutions are needed. Targeted funding to increase the number and amount of portable rental supplements can provide immediate relief and help adults with intellectual and developmental disabilities access inclusive, affordable housing in their community of choice.

People with disabilities bear hidden costs with a smaller pool of options to choose from when renting. This is an area in which we have some [data](#); we know 5000 people funded through Community Living BC will need a place to live in the next four years.

## Recommendation

12. Invest 3 million in portable rental supplements to support 300 people, in collaboration with Community Living BC, to enter into supported and independent living options on an equal basis with other citizens in our province.

## UNCRPD Article 28 – Adequate standard of living and social protection

1. States Parties recognize the right of persons with disabilities to an adequate standard of living for themselves and their families, including adequate food, clothing and housing, and to the continuous improvement of living conditions, and shall take appropriate steps to safeguard and promote the realization of this right without discrimination on the basis of disability.
2. States Parties recognize the right of persons with disabilities to social protection and to the enjoyment of that right without discrimination on the basis of disability, and shall take appropriate steps to safeguard and promote the realization of this right, including measures:
  - a. To ensure equal access by persons with disabilities to clean water services, and to ensure access to appropriate and affordable services, devices and other assistance for disability-related needs;
  - b. To ensure access by persons with disabilities, in particular women and girls with disabilities and older persons with disabilities, to social protection programmes and poverty reduction programmes;
  - c. To ensure access by persons with disabilities and their families living in situations of poverty to assistance from the State with disability-related expenses, including adequate training, counselling, financial assistance and respite care;
  - d. To ensure access by persons with disabilities to public housing programmes;
  - e. To ensure equal access by persons with disabilities to retirement benefits and programmes.

**Research** constantly shows that people with disabilities have lower median incomes and, according to Statistics Canada, makeup over 40% of the low-income population. People with intellectual and developmental disabilities have lower incomes among this group. Inclusion BC acknowledges the boost given to the Person with Disabilities Benefit in the 2021 Budget. At the same time, we want to emphasize that the rate has not reached an equivalent to what has been now established as a basic income.

## Recommendation

13. In collaboration with the federal government, raise the PWD Benefits rate to \$2,200 and adjust it yearly to the provincial cost of living.

## UNCRPD Article 25 – Health

1. States Parties recognize that persons with disabilities have the right to the enjoyment of the highest attainable standard of health without discrimination on the basis of disability. States Parties shall take all appropriate measures to ensure access for persons with disabilities to health services that are gender-sensitive, including health-related rehabilitation. In particular, States Parties shall:
  - a. Provide persons with disabilities with the same range, quality and standard of free or affordable health care and programmes as provided to other persons, including in the area of sexual and reproductive health and population-based public health programmes;
  - b. Provide those health services needed by persons with disabilities specifically because of their disabilities, including early identification and intervention as appropriate, and services designed to minimize and prevent further disabilities, including among children and older persons;
  - c. Provide these health services as close as possible to people’s own communities, including in rural areas;
  - d. Require health professionals to provide care of the same quality to persons with disabilities as to others, including on the basis of free and informed consent by, inter alia, raising awareness of the human rights, dignity, autonomy and needs of persons with disabilities through training and the promulgation of ethical standards for public and private health care;
  - e. Prohibit discrimination against persons with disabilities in the provision of health insurance, and life insurance where such insurance is permitted by national law, which shall be provided in a fair and reasonable manner;
  - f. Prevent discriminatory denial of health care or health services or food and fluids on the basis of disability.

The provincial recovery plans highlight the importance of supporting people’s health, including mental health, as we continue navigating this pandemic. The fragmented services and the lack of recognition and understanding of the health and mental health needs of people with intellectual and developmental disabilities have left them significantly marginalized. For example, adults over 26, have limited mental health service options to turn to. Developmental Disabilities Mental Health Services (DDMH) are not

able to respond to the demand and the waitlists can be up to 18 months long. We need to increase the capacity of the healthcare system to respond to the needs of all adults.

The needs of people with intellectual and developmental disabilities are impacted across multiple systems with scattered accountability. Having a dedicated office to lead, provide oversight, collect data, and offer training would provide a coordinated approach that is much needed to meet their health and wellness needs.

## Recommendation

14. Targeted funds to create a provincial office to provide leadership and oversight for the health and mental health services for people with intellectual and developmental disabilities.

Inclusion BC strongly urges the province to invest in **a solid recruitment and retention strategy to address the current crisis the social service sector is experiencing**. Including the wage inequity for non-union workers. It is a dire situation and significantly impacting our collective ability to deliver person-centered support in all aspects of community life.

**Thank you for the opportunity to provide a submission. Inclusion BC offers our support to implement all the recommendations as an ally to government and strong community partner.**

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## List of Recommendations

1. We recommend the Province of BC invest in a coordinated approach to collecting provincial-level data (particularly within the funding Ministries of Children and Family, Child Care, Education, Social Development and Poverty Reduction, Health, and the Ministry responsible for Housing) and disseminate statistics to help assess if people's support needs are being met in our province and to guide sufficient investment.
2. Eliminating waitlists to Supported Child Development Program with a funding increase of \$50 million per year for the next three years.

3. Expand access to Early Intervention Therapies with a funding increase of \$20 million per year for the next three years.
4. Eliminate waitlist for assessments by making a targeted allocation of funding.
5. Targeted fund within CYSN to support families' need for respite services in a competitive employment market.
6. Increase the funding for Children and Youth with Support Needs to match actual costs of supports and services that children and youth require.
7. Ensure the successful implementation of the CYSN Service Framework by establishing a targeted fund.
8. Eliminate waitlists for educational assessments by establishing a targeted fund.
9. Expand the funding and mandate of Provincial Outreach Programs to allow parents and educators to initiate support requests and increase their capacity to support more students.
10. Increase the funding allocation for diverse learners (Level 1, 2 and 3 supplemental funding) by 25% for the next three years.
11. Fund the development of a more comprehensive tool to assess the needs and allocate supports for people eligible for CLBC services.
12. Invest 3 million in portable rental supplements to support 300 people, in collaboration with Community Living BC, to enter into supported and independent living options on an equal basis with other citizens in our province.
13. In collaboration with the federal government, raise the PWD Benefits rate to \$2,200 and adjust it yearly to the provincial cost of living.
14. Targeted funds to create a provincial office to provide leadership and oversight for the health and mental health services for people with intellectual and developmental disabilities.



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