

May 2014

## DISABILITY ASSISTANCE: AN AUDIT OF PROGRAM ACCESS, INTEGRITY AND RESULTS

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The Honourable Linda Reid  
Speaker of the Legislative Assembly  
Province of British Columbia  
Parliament Buildings  
Victoria, British Columbia  
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Dear Madame Speaker:

I am pleased to transmit to the Legislative Assembly of British Columbia my report, *Disability Assistance: An Audit of Program Access, Integrity and Results*.

We conducted the audit in accordance with Section 11(8) of the *Auditor General Act* and the standards for assurance engagements set out in the *CPA Canada Handbook - Assurance*.

In this audit, we examined the Ministry of Social Development and Social Innovation's disability assistance program designed to assist vulnerable individuals whose disabilities leave them financially dependent. The disability assistance program assists many individuals by providing them with income supports to address their basic living and health needs.

The financial support rates for shelter and other basic necessities provided for under this program have not increased since 2007. Our audit found that the ministry has not defined the extent to which basic needs should be met by the program, and has limited information on how effectively the program is meeting the basic needs of its clients. As a result, it is difficult for the ministry to set assistance rates at an appropriate level and gauge its success in this area. This is concerning because these individuals may be at risk of not having their basic needs met.

Recommendations in the report include that the ministry clearly define the objectives of the program and improve the measurement of the program's impact on the lives of people with disabilities. The report also contains recommendations to enhance the eligibility decision processes to reasonably ensure that benefits are provided only to eligible individuals, and to ensure decisions are timely.

Given that people with disabilities often experience a wide range of challenges, it makes sense that the disability assistance system should be simple and accessible; it is not. The five-step process to apply for and maintain disability assistance benefits requires communication methods that are not always accessible to everyone. This creates a risk that clients are not getting the services that they need.

I would like to thank ministry staff for their cooperation and assistance over the course of this audit. I am also grateful to the numerous individuals and groups that we spoke with as part of our work. All are dedicated to improving the lives of people with disabilities, and we thank them for their input.

Russ Jones, MBA, CA  
Auditor General  
Victoria, British Columbia  
May 2014

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**THE PROVINCIAL GOVERNMENT** wants to make its system of supports for persons with disabilities the most progressive in Canada. Achieving this goal requires the efforts of multiple ministries and government programs. In this audit, we examined one of the programs, the Ministry of Social Development and Social Innovation's disability assistance program, which is designed to assist vulnerable individuals whose disabilities leave them financially dependent. The disability assistance program assists many individuals by providing them with income supports to address their basic living and health needs. While there are other programs that support this group of people, this program is usually the main source of income for these individuals.

The financial support rates for shelter and other basic necessities provided for under this program have not increased since 2007. The audit found that the ministry has not defined the extent to which basic needs should be met by the program, and has limited information on how effectively the program is meeting the basic needs of its clients. As a result, it is difficult for the ministry to set assistance rates at an appropriate level and gauge its success in this area. This is concerning because these individuals may be at risk of not having their basic needs met. We recommended that the ministry clearly define the objectives of the program and improve the measurement of the program's impact on the lives of people with disabilities. To develop a comprehensive suite of measures will require partnerships with other government agencies. Government as a whole needs to show leadership in this area to support the efforts of this ministry.

The disability assistance program is complex, and demand for services is increasing, yet funding is limited. The ministry is challenged to provide easily accessible services while ensuring that assistance is provided only to those that truly need it. This report contains recommendations to enhance the eligibility decision processes to reasonably ensure that benefits are provided only to eligible individuals, and to ensure decisions are timely.

Given that people with disabilities often experience a wide range of challenges, it makes sense that the disability assistance system should be simple and accessible; it is not. In fact, clients often need support just to navigate the system because information is not easy to find or understand, and the application process and requirements are complex. For instance, the five-step process to apply for and maintain disability assistance benefits requires a computer, telephone, in-person meetings and the mail. These communication methods are not always accessible to everyone. This creates a risk that clients are not getting the services they need. Our audit found that the ministry would benefit from a better understanding of their clients. It could then adapt its programs to be more accessible.



**RUSS JONES, MBA, CA**

*Auditor General*

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# AUDITOR GENERAL'S COMMENTS

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Government recently completed a public consultation on how British Columbia can increase accessibility and decrease barriers for people living with disabilities. Although our performance audit was conducted independently from this consultation, we shared our findings as early as possible with the ministry, recognizing that they could be beneficial.

I would like to thank ministry staff for their cooperation and assistance over the course of this audit. I am also grateful to the numerous individuals and groups that we spoke with as part of our work. All are dedicated to improving the lives of people with disabilities, and we thank them for their input.



Russ Jones, MBA, CA

Auditor General

May 2014

**THE GOVERNMENT OF BRITISH COLUMBIA** has set the goal of becoming the most progressive jurisdiction in Canada for people living with disabilities. The province has a wide range of programs and services to achieve this goal, administered by several ministries.

In this audit, we examined BC's disability assistance program. The program is available to individuals who qualify for the Persons with Disabilities (PWD) designation and provides income supports to low income adults with health-related challenges that restrict their independence. Disability assistance is delivered through the social assistance system by the Ministry of Social Development and Social Innovation. The ministry's aim is to help disability assistance clients attain independence, community inclusion and employment.

The disability assistance program provides financial assistance to individuals to assist with meeting their basic needs, including shelter, clothing and nutrition. It also provides them with some health supplements not covered under public healthcare; assistance with transportation; and supports to find employment. Approximately 95,000 clients are currently served by the ministry across the province, with the financial assistance and supplementary benefits and services totalling over \$1 billion annually.

We undertook this audit to determine whether:

- ◆ the ministry's disability assistance services are accessible;
- ◆ the ministry can demonstrate that its eligibility decisions and payments for disability assistance are accurate and timely; and
- ◆ the ministry can demonstrate whether it contributes to improved outcomes for its disability assistance clients.

## **The disability assistance program is not easy to access**

The ministry aims to provide easily accessible services to vulnerable clients. To achieve this, it is important that the ministry has service delivery strategies in place, informed by the needs of its clients.

The ministry has a number of policies and strategies for promoting accessible services including the ministry's 'Channel Strategy' which was not fully implemented at the time of our audit. We found a number of barriers that are currently reducing the accessibility of the system. The disability assistance system is administratively complex and difficult to navigate. Both the online and telephone services are not consistently accessible for clients, and there are challenges with the physical accessibility of a small number of service delivery sites.

While the ministry has done some analysis and consulted with stakeholders, we found that it has not fully assessed the accessibility needs of its clients. Further analysis is essential to ensure that service delivery options are appropriate given the needs and abilities of the clients served.

**Risks are not being fully managed to ensure benefits are provided only to eligible individuals and eligibility decisions are made in a timely manner**

Government's spending on the disability assistance program is significant and expected to increase given a growing caseload. Therefore, the systems and processes that are in place should reasonably ensure only eligible individuals receive services, and that those services are being provided in a timely way. The ministry should also have systems that detect errors in payments to ensure clients receive the correct amount of assistance.

The ministry has a number of systems and processes in place to assess the financial eligibility of its clients and to proactively monitor, detect and recover overpayments. However, the ministry's system and processes for determining initial and ongoing eligibility for the PWD designation can be improved. The audit found that there is a risk that some individuals may be in receipt of PWD benefits that do not qualify. In addition, there is a risk that clients whose condition has worsened are not receiving services that they would benefit from.

As well, the ministry cannot demonstrate that eligibility decisions are timely. The ministry has several service standards related to the timeliness of eligibility decisions, but it is not consistently measuring and reporting its performance against all of these standards. At the time of our audit, the ministry had limited information on whether clients are receiving benefits in a timely manner. This makes it difficult for the ministry to identify areas where processes could be streamlined.

**The ministry has not completed a comprehensive evaluation of the disability assistance program and is unable to demonstrate that the program is contributing to improving the lives of clients**

To effectively evaluate program results, the ministry should have a comprehensive evaluation plan, with clear and measureable indicators against which to track the progress and success of its disability assistance program over time. Only in this way would the ministry adequately know whether its efforts in this area are addressing clients' needs and contributing to improving their lives.

We found that the ministry has not undertaken a full evaluation of its program outcomes. The ministry has not clearly defined objectives for clients nor confirmed a suite of standard measures and corresponding targets to gauge results. For example, the ministry has not defined clear objectives and measurable targets that define what it means to meet the basic needs of clients. It has, however, adopted a range of indicators, and consulted with stakeholders to track some aspects of client outcomes. Ministry information indicates that given the level of assistance provided, some clients' basic needs may not be met. Clients may need to turn to charitable donations, family support and other sources of assistance to obtain appropriate shelter and other basic necessities.

# EXECUTIVE SUMMARY

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The ministry has not yet fully evaluated the success of its employment programs. In terms of tracking the health and social outcomes of the disability assistance program, the ministry has developed some preliminary indicators but has not fully evaluated these results. As a result, the ministry has limited information on whether its actions are addressing clients' needs and improving outcomes in these areas.

Such information would help the ministry identify gaps and overlap with other government and community programs that serve this same group of citizens. It would also help decision-makers better understand the impact of policy choices regarding the amount and type of assistance provided to clients.

## WE RECOMMEND THAT THE MINISTRY OF SOCIAL DEVELOPMENT AND SOCIAL INNOVATION:

- 1** collect additional information on its clients' needs and use this to address accessibility barriers for vulnerable clients.
- 2** ensure that its online information on PWD designation eligibility is clear and easy to find.
- 3** review the PWD application process to address the risk that some applicants may not have a family physician, and improve the clarity of the PWD application form. This includes developing guidance to help clients, physicians and assessors in completing the application.
- 4** ensure that frontline staff training is relevant, current and addresses topics such as client-centred services, accommodation and working with people who have a wide-range of barriers and disabilities.
- 5** develop and implement additional strategies to ensure that timely, accurate and consistent services are provided through the toll-free telephone service.
- 6** improve the online application process to address redundancies, and improve the clarity of guidance for applicants.
- 7** work with trusted third parties and Service BC to identify and address physical accessibility issues for clients.
- 8** develop and implement a risk-based approach for reviewing initial and ongoing client eligibility for the PWD designation, to better ensure the program is serving only those clients who are eligible for benefits and supports.
- 9** report on the timeliness of eligibility decisions by measuring and reporting results against the service standards.
- 10** develop a comprehensive evaluation framework for the PWD program that:
  - ◆ sets objectives, targets/benchmarks to define what it means to meet clients' basic needs;
  - ◆ sets standard measures to track whether clients can access appropriate shelter, food and other necessities;
  - ◆ establishes a baseline and targets to measure employment success for clients; and
  - ◆ in partnership with other agencies defines, tracks and monitors a range of health and social indicators to assess this broader range of outcomes.

## THE MINISTRY OF SOCIAL DEVELOPMENT AND SOCIAL INNOVATION

**THE MINISTRY OF SOCIAL DEVELOPMENT AND SOCIAL INNOVATION** would like to thank the Auditor General for reviewing the ministry's disability assistance program. The ministry is committed to supporting government's goal to be the most progressive jurisdiction for persons with disabilities and above all else, considers the wellbeing of the clients it serves. Through policy reforms made in 2012 and the introduction of additional service delivery options, the ministry has been able to service its client base better. With that said, there will always be more improvements that can be made.

We have recently had the opportunity through the Disability White Paper consultation to hear directly from thousands of British Columbians, many of whom are people living with disabilities and their advocates and family members. Many of these individuals are on the ministry's disability assistance caseload. This has been an unprecedented opportunity to increase the ministry's understanding of the issues our clients face.

As the Auditor General describes in his report, supporting the needs of persons with disabilities requires the efforts of multiple ministries and government programs, of which the disability assistance program is one program. A holistic assessment of these government programs would be necessary to understand the range of supports people with disability receive and the overall outcomes achieved as a result.

The ministry is moving forward to address the Auditor General's recommendations and is committed to improving client accessibility, the integrity and timeliness of eligibility decisions and the evaluation of client outcomes. In addition, the ministry takes very seriously the Auditor General's comments on program integrity and will increase efforts to ensure program investments are focused on improving benefits and supports for eligible clients.

### **RECOMMENDATION 1:** *We recommend that the Ministry of Social Development and Social Innovation collect additional information on its clients' needs and use this to address accessibility barriers for vulnerable clients.*

#### *SDSI response:*

The Ministry has and will continue to build and maintain robust processes at the provincial and local level to engage both clients and advocates. For example, applicants are asked to respond to a voluntary survey when they use the Self-Serve Application and clients are currently being surveyed on their satisfaction and preferences regarding service delivery. In addition, the ministry will continue to hold client focus groups and the new phone and online portal service options will provide clients the opportunity to provide direct feedback with each service experience.

**RECOMMENDATION 2:** *We recommend that the Ministry of Social Development and Social Innovation ensure that its online information on PWD designation eligibility is clear and easy to find.*

*SDSI response:*

The Online Resource provides extensive transparency regarding policy and legislation, and augments several other information options for clients and advocates. The Ministry will continue to refine the functionality of the tool (search capacity in particular), and improve the clarity and accessibility of information, based on user feedback.

**RECOMMENDATION 3:** *We recommend that the Ministry of Social Development and Social Innovation review the PWD application process to address the risk that some applicants may not have a family physician, and improve the clarity of the PWD application form. This includes developing guidance to help clients, physicians and assessors in completing the application.*

*SDSI response:*

The ministry accepts this recommendation. In conjunction with recommendation #8, the ministry will explore ways to enhance and streamline the PWD application process in consideration of the feedback from the Auditor General as well as input received through the White Paper consultation.

**RECOMMENDATION 4:** *We recommend that the Ministry of Social Development and Social Innovation ensure that frontline staff training is relevant, current and addresses topics such as client-centred services, accommodation and working with people who have a wide-range of barriers and disabilities.*

*SDSI response:*

The Ministry will continue to provide and build on its training regime that is in place for front line staff. The following training has been delivered to front line staff since 2010; Duty to Accommodate; Mental Health; Active Listening; Recognizing and Reporting Child Abuse and Neglect; Domestic Violence; Diversity; Service Excellence; Violence Prevention; and Advanced Decision Making.

**RECOMMENDATION 5:** *We recommend that the Ministry of Social Development and Social Innovation develop and implement additional strategies to ensure that timely, accurate and consistent services are provided through the toll-free telephone service.*

*SDSI response:*

New telephony software is being rolled out across the province in May, providing expanded options including the ability for clients to leave a call back number while maintaining ones place in line, and access to self-serve information. It will also support the establishment of one provincial telephone queue to manage the approximately 1.5 million calls annually, with consistent response times regardless of where in the province the call is initiated. The Ministry will continue the work in progress to improve its telephone services.

**RECOMMENDATION 6:** *We recommend that the Ministry of Social Development and Social Innovation improve the online application process to address redundancies, and improve the clarity of guidance for applicants.*

*SDSI response:*

The Ministry will continue to streamline the general Income Assistance process through a virtually centralized process. The Ministry will build on these successes, continue to seek feedback from applicants, and endeavour to enhance the generally positive feedback received to date and address issues raised.

**RECOMMENDATION 7:** *We recommend that the Ministry of Social Development and Social Innovation work with trusted third parties and Service BC to identify and address physical accessibility issues for clients.*

*SDSI response:*

The Ministry is committed to ensuring full physical access for clients. While all sites where the Ministry delivers service are wheel chair accessible, there are a small number of sites where wheelchair access is not viable from the parking area. The Ministry will discuss these specific sites with Shared Services BC and Service BC and where possible, encourage the consideration of accessibility modifications. In addition, the Ministry will add accessibility to the evaluation criteria for future procurement of trusted third party service providers to ensure a transition to full accessibility.

**RECOMMENDATION 8:** *We recommend that the Ministry of Social Development and Social Innovation develop and implement a risk-based approach for reviewing initial and ongoing client eligibility for the PWD designation, to better ensure the program is serving only those clients who are eligible for benefits and supports.*

*SDSI response:*

The Ministry has a wide array of mechanisms in place to support accurate PWD decisions, a formal reconsideration process, a complaints process, and a second reading of PWD applications for new adjudicators. In conjunction with recommendation #3, the ministry will explore ways to enhance and streamline the PWD application process to ensure the program is serving only those clients eligible for supports.

**RECOMMENDATION 9:** *We recommend that the Ministry of Social Development and Social Innovation report on the timeliness of eligibility decisions by measuring and reporting results against the service standards.*

*SDSI response:*

The Ministry regularly monitors general application timeliness (the number of applications received, average number of days at different milestones in the process and the number of applications outside the service standard) and telephony performance (the number of calls offered, calls answered, and abandonment rate). Applications are triaged so applicants fleeing abuse or within immediate need are addressed first. In addition the ministry monitors and meets or exceeds both the PWD determination standard and the Reconsideration Decision standard on an ongoing basis. The Ministry will explore ways to enhance reporting out on these timelines against service standards.

**RECOMMENDATION 10:** *We recommend that the Ministry of Social Development and Social Innovation develop a comprehensive evaluation framework for the PWD program that:*

- ◆ *sets objectives, targets/benchmarks to define what it means to meet clients' basic needs;*
- ◆ *sets standard measures to track whether clients can access appropriate shelter, food and other necessities;*
- ◆ *establishes a baseline and targets to measure employment success for clients; and*
- ◆ *in partnership with other agencies defines, tracks and monitors a range of health and social indicators to assess this broader range of outcomes.*

**SDSI response:**

The ministry actively tracks several key client indicators where data is readily available and will expand this work to develop a comprehensive evaluation framework specific to the PWD program and clients served. The ministry will work with other key agencies that track health and social indicators to determine if this information can provide the ministry with a better understanding of the population it serves.

Any evaluation framework developed will need to take into consideration the significant challenges that come with aggregating multi-ministry client data and the attribution issues inherent in a system of programs and supports delivered by a number of provincial and federal agencies.

## BACKGROUND

### **What is disability assistance?**

All but one of the Canadian provinces have a specific disability assistance program to help those individuals who face permanent or temporary barriers to financial independence because of a disabling medical condition. Such programs typically provide clients with a higher level of financial assistance and exemptions than general social assistance programs offer. Some jurisdictions also provide their clients with medical equipment, nutritional supplements and other forms of support. Unlike general social assistance programs, disability assistance clients in all jurisdictions are also exempt from work search requirements in order to receive support.

To receive financial assistance, clients must meet financial and disability-related eligibility requirements on an ongoing basis. In this way, the experiences of disability assistance clients vary significantly: while some clients will see their medical condition improve, allowing them to transition from disability assistance into employment, others with permanent or enduring conditions may rely on disability assistance benefits for many of their working age years.

#### Promoting independence and community inclusion for people with disabilities

In British Columbia (BC), the employment rate for people with disabilities is significantly lower than for the general population. These individuals are, thus, more likely to earn low incomes in their working years, and to be excluded from many social and economic opportunities. These relatively poor outcomes have led to a shift in social policy views on how to promote improved outcomes for persons with disabilities. The Ministry of Social Development and Social Innovation's vision is "a province in which British Columbians in need are assisted to achieve their social and economic potential."

**UN Convention on the Rights of Persons with Disabilities** – In 2010, Canada ratified the UN Convention on the Rights of Persons with Disabilities, committing to promoting the equality rights and social status of people with disabilities. The Convention's human rights framework for people with disabilities entrenches their equality rights and capacity to actively engage in all aspects of society. Specific provisions also set out the rights of people with disabilities to an adequate standard of living (food, clothing, housing, and living conditions) and to equality of employment opportunities.

**Government's White Paper Consultations** – The provincial government has set the goal of becoming the most progressive place in Canada for people living with disabilities. In support of that goal, government tasked the Ministry of Social Development and Social Innovation to write a white paper and host a Summit on how government, businesses and communities can increase accessibility and decrease barriers for people living with disabilities in BC. The ministry conducted public consultations on issues facing people with disabilities between December 2013 and March 2014.

## The province's disability assistance program

British Columbia's disability assistance program is the responsibility of the Ministry of Social Development and Social Innovation. Disability assistance benefits and services are provided to eligible individuals under the Persons with Disabilities (PWD) designation.

The criteria for PWD eligibility and supplementary benefits are legislated under the *Employment and Assistance for Persons with Disabilities Act* and its associated regulations. To be eligible for the PWD designation, clients must provide evidence that they are restricted in performing daily living activities as a result of their medical condition. If they qualify, they may then receive monthly financial support for basic needs such as food, shelter and clothing (see Exhibit 1). Clients may also be eligible for a range of supplementary benefits (see Exhibit 2), such as health and transportation benefits. This program provides a "last resort" source of support. Clients have no alternative government program to turn to in order to assist with meeting their basic needs. However, clients may also benefit from other levels of government policies, such as federal tax credits and Registered Disability Savings Plans (RDSPs).

### **Exhibit 1:** Example of the assistance rate for Persons with Disabilities (PWD) clients

#### PWD rates for a single individual (assistance rates since June 1, 2007)

Support amount	\$531.42
Maximum shelter amount	\$375.00
Total monthly assistance maximum	\$906.42

Source: Compiled by the Office of the Auditor General. Data obtained from the Ministry of Social Development and Social Innovation's website.

### **Exhibit 2:** Examples of supplementary benefits that Persons with Disabilities (PWD) clients may receive while on the Disability Assistance Program

#### Examples of supplementary benefits

Benefit type	Description
<b>Supplementary support</b>	Clients may be eligible for both health-related supplements and services, including assistance to cover mobility aids, nutritional supplements and medical supplies.
<b>Medical coverage</b>	Clients receive coverage for a premium-free Medical Services Plan, no-deductible for PharmaCare and other medical benefits such as dental and optical care.
<b>Transportation</b>	Clients may be eligible for a \$45 annual bus pass.
<b>Employment earnings exemptions</b>	Clients can earn up to \$800/month and still retain the basic shelter and support amounts.
<b>Income and asset exemptions</b>	Clients who have access to savings in trusts or RDSPs can draw on these assets without affecting their benefit levels.

Source: Compiled by the Office of the Auditor General. Data obtained from the Ministry of Social Development and Social Innovation's website.

## The PWD caseload

The ministry's PWD caseload includes some of society's most vulnerable citizens – those who must endure many barriers to independence, including a range of severe and concurrent medical (physical and mental) disorders, limited education and employment income, and extended periods of living on low income.

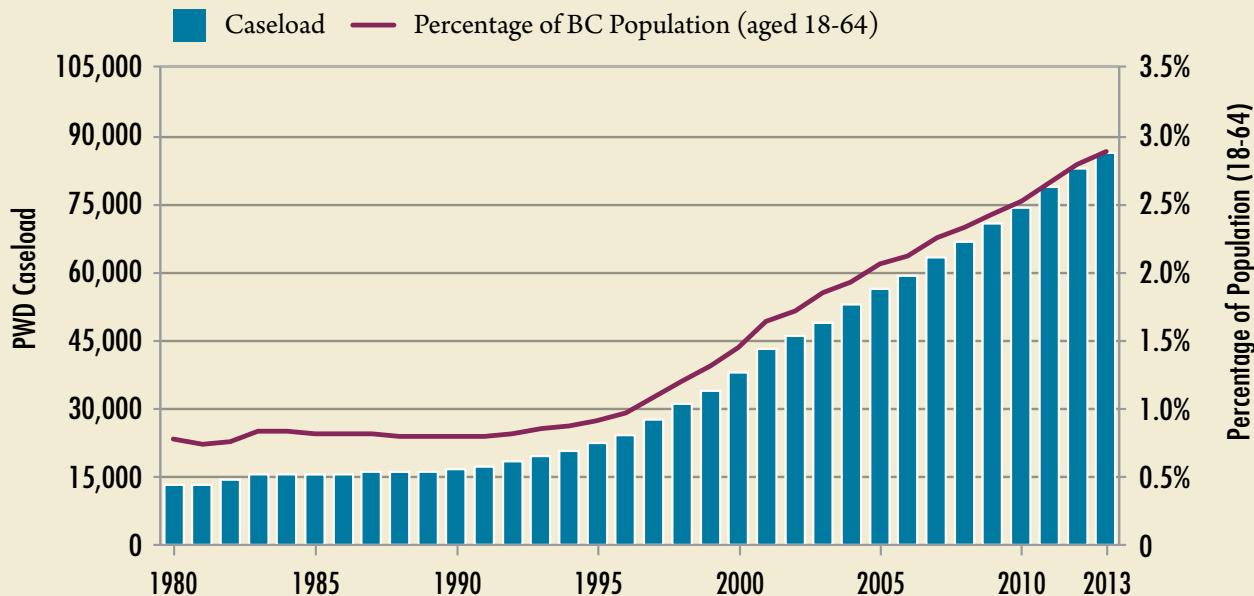
Currently the caseload is approximately 95,000 people and is expected to continue to increase in the future. The ministry has attributed steady growth in the caseload (see Exhibit 3) to a number of factors, including changes to the definition of disability that expanded the range of individuals who would be eligible for the program as well as population health and socio-economic trends that increases the need for the program. Other provinces and international jurisdictions are experiencing similar growth in the number of individuals on disability assistance programs.

## *The costs*

In 2013/14, the ministry spent over \$975 million on shelter and support assistance for clients with the PWD designation. In the same year, the ministry also spent approximately \$290 million on supplementary benefits for all income assistance clients.

Exhibit 3 provides details of the PWD caseload growth trend.

**Exhibit 3:** Average annual Persons with Disabilities (PWD) caseload as a percentage of all British Columbia adults, 1980–2013



Source: Ministry of Social Development and Social Innovation

## AUDIT OBJECTIVES AND SCOPE

Delivering timely, accessible services that accommodate the range of complex needs of clients is a considerable challenge to undertake. At the same time, the ministry has a duty to safeguard public funds – both by making sound eligibility decisions and by assessing whether its services are contributing to the achievement of positive outcomes.

We, therefore, carried out this audit to determine whether:

1. the ministry's disability assistance services are accessible;
2. the ministry can demonstrate that its eligibility decisions and payments for disability assistance are accurate and timely; and
3. the ministry can demonstrate whether or not it is contributing to improved outcomes for its disability assistance clients.

We conducted the audit under Section 11(8) (b) of the *Auditor General Act* and the standards for assurance engagements set out in the *CPA Canada Handbook - Assurance*.

The work was carried out between May 2013 and January 2014. It involved review and analysis of legislation, policies, procedures and systems the ministry uses to deliver PWD benefits and monitor its program administration. We did this review and analysis at the community, regional and provincial levels, including making site visits to two sample regions to examine ministry practices in different geographic and demographic contexts. Interviews and walkthroughs were also performed with ministry executive, supervisors, analysts and service delivery staff. As well, we held discussions with regional and provincial advocacy groups and stakeholders to obtain their perspectives on the effectiveness and accessibility of the support system for clients.

We did not review the information the ministry gathered for its white paper (see bottom of [page 14](#)). Our work was conducted independently from that of the ministry.

Audit Objective	Audit Scope	Outside Audit Scope
<b>Accessibility of ministry services</b>	<p>We audited the ministry's service delivery systems and processes:</p> <ul style="list-style-type: none"> <li>◆ channels of service delivery (face-to-face, telephone, online)</li> <li>◆ administrative requirements for applying for PWD</li> </ul>	We did not audit third-party service and product providers outside the ministry (e.g. dentists, mobility product retailers, public transportation, and health authorities).
<b>Ministry's systems for accurate and timely eligibility decisions</b>	<p>We audited the ministry's system design, delivery and monitoring of:</p> <ul style="list-style-type: none"> <li>◆ initial and ongoing eligibility for financial assistance</li> <li>◆ eligibility determination for the PWD designation</li> </ul> <p>We audited the ministry's service standards and measurement of:</p> <ul style="list-style-type: none"> <li>◆ initial determination of eligibility for financial assistance</li> <li>◆ PWD designation eligibility determination (adjudication and reconsideration)</li> </ul>	<p>We did not audit the accuracy and timeliness of the provision of general or health-related supplements for clients.</p> <p>We did not audit the controls within the IT systems that ensure accuracy.</p>
<b>Ministry's contribution to improved outcomes</b>	We audited how the ministry defines and evaluates its contribution to improving outcomes for clients.	We did not directly audit whether client needs are being met relative to the financial and supplemental assistance provided.

## THE ACCESSIBILITY OF THE PROGRAM

### Overall Conclusion

*The ministry's disability assistance program is not easy to access*

Providing easily accessible services to vulnerable clients is a goal of the ministry. Therefore, the ministry should have service delivery strategies in place, informed by the needs of their clients.

The ministry has a number of policies and strategies for promoting accessible services including the ministry's 'Channel Strategy' which was not fully implemented at the time of our audit. We found a number of barriers that are currently reducing the accessibility of the system. The disability assistance system is administratively complex and difficult to navigate; both the online and telephone services are not consistently accessible for clients; and there are challenges with the physical accessibility of a small number of service delivery sites.

While the ministry has done some analysis and consulted with stakeholders, we found that it has not fully assessed the accessibility needs of its clients. Further analysis is essential to ensure that service delivery options are appropriate given the needs and abilities of the clients served.

## Key Findings and Recommendations

### *The ministry has goals and strategies for promoting accessible services*

The ministry's mission statement is customer-service focused, setting out the ministry's priorities: to transform service delivery; to focus on client outcomes; and to collaborate with other agencies and the broader community. The ministry's Service Plan goals also emphasize client accessibility.

The recently launched "Channel Strategy" is the ministry's core service delivery initiative for modernizing and improving the accessibility of services. At the time of the audit, this strategy was not fully implemented. The Channel Strategy has four accessibility goals:

1. Broaden online and telephone access to services for clients;
2. Maximize efficiency;
3. Integrate service delivery formats and government priorities; and
4. Continuously improve to ensure effectiveness.

The ministry indicates that face-to-face access would continue to be available where necessary and appropriate. The service delivery transformation includes partnering with Service BC and select third-party sites to provide a limited number of in-person services in communities without a ministry office location (see sidebar).

To support its accessibility goal, the ministry has a number of policies and practices that promote its mandate and its legal obligations. For example:

- ◆ **The duty to accommodate:** The ministry is committed to providing an environment that is inclusive and does not discriminate on any grounds protected under human rights legislation.
- ◆ **Client-centred services:** When interacting with all clients, ministry staff are expected to apply active listening skills and recognize verbal and non-verbal cues which may indicate a need for a more comprehensive level of assistance.
- ◆ **Adjudication, reconsideration and appeals:** The ministry provides detailed written decisions for benefit eligibility and provides a two-stage appeals process.
- ◆ **Outreach services:** Front-line workers directly support individuals who are pending release from corrections facilities for example.
- ◆ **Youth transitions:** A simplified PWD application process to facilitate transitions for youth with an Intellectual Disability from youth services to the PWD program.

Arrangements for providing clients with face-to-face services

**Ministry Employment and Assistance Offices** – The ministry runs 57 community offices across five regions in the province, providing citizens with a full range of face-to-face services (i.e. accepting of documentation and applications, determining initial and ongoing eligibility for income assistance).

**Service BC** – The ministry offers a limited number of services through 29 Service BC locations (i.e. providing clients with access to phones and computers for contacting the ministry, accepts application details for submission to the ministry).

**Trusted third parties** – The ministry contracts with four trusted third parties to provide clients with a limited number of services (i.e. issuing food vouchers and providing access to phones and computers to contact the ministry) where a Service BC location is not available.

## *The ministry does not have a full understanding of the service needs of its clients*

The ministry has systems and processes in place to monitor issues with the accessibility of services at the community, regional and provincial levels. Community and Regional Service Quality Managers liaise with advocacy groups and stakeholders to resolve complaints and receive feedback on service quality and related issues. Provincial-level initiatives include formal engagements with stakeholders to share information and receive feedback on policy, service quality and client outcomes.

While the ministry has done some analysis and consulted with stakeholders, we found that it has not fully assessed the accessibility needs of its clients. The analysis has been limited and has not been used to help identify potential service gaps. For example, the ministry should know what proportion of its clients: are computer literate; have easy access to a telephone, computer and the Internet; or rely on family, friends, or non-profit groups to assist them with accessing services.

By gathering the right information, the ministry could improve accessibility for clients who:

- ◆ face barriers in terms of computer literacy, phone and online access;
- ◆ have sensory disabilities;
- ◆ speak different languages; and
- ◆ have mental health, developmental disabilities or other issues that require support in navigating the system.

## **RECOMMENDATION 1: We recommend that the Ministry of Social Development and Social Innovation collect additional information on its clients' needs and use this to address accessibility barriers for vulnerable clients.**

## *The current disability assistance program is challenging for clients to easily access*

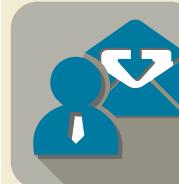
The current disability assistance program poses accessibility challenges for clients in three main areas: system design and complexity, telephone and online channels, and the physical accessibility of offices.

### **The system's design and complexity**

We found several barriers to accessibility resulting from the system's complex design and administrative requirements. For example:

- ◆ As shown in Exhibit 4, there is a five step process to applying for and maintaining disability assistance. The typical process requires a computer, telephone, in-person meetings and the mail; therefore, all these forms of communication must be easily accessible.

**Exhibit 4:** The application process for Persons With Disabilities (PWD) benefits

Steps to apply for PWD benefits	Step 1: Assessment and application	Step 2: Intake	Step 3: Authorization	Step 4: PWD application submission	Step 5: Monthly reporting
<b>How services are delivered</b>	Online 	Telephone 	In-person 	Mail, fax or in-person 	In-person or mail 
<b>Description of process for applicant</b>	Applicant completes a mandatory detailed online application, providing details on his/her employment history and status, finances, family status, and disability-related information.	Ministry calls the applicant to collect further information and verify details.	Applicant provides authorization in-person for the ministry to determine eligibility for income assistance.	Applicant completes the 23 page application, including physician and assessor sections. Application then mailed, faxed or dropped off in-person to the ministry. Applications for the Reconsideration branch must also be mailed or faxed to the ministry.	Once eligible, applicant must report any changes to income by completing necessary documents and returning them to the ministry by mail or in-person.
<b>Alternative service options</b>	For those without access to a computer or the ability to complete the online application, the ministry provides a computer and individual assistance in their offices.	For those without access to a telephone or the ability to make the call, service is available in-person by appointment at a ministry office.	There are no alternatives. Prospective clients must provide authorization in-person.	There are no alternatives.	An online self-serve tool for a number of processes is forthcoming.

Source: Compiled by the Office of the Auditor General of British Columbia

- ◆ Navigating the program is often not easy for individuals. The rules governing the provision of PWD benefits and services are embedded in a complex set of legislated eligibility rules. The service delivery model requires that an applicant have a high level of functioning and understanding of the eligibility rules and application process to access services. The online resource houses important information on eligibility rules so clients can understand what they may be eligible for. Having this information available to the public is a positive step towards promoting accessibility; however, it is not easy to navigate and information is difficult to find.
- ◆ The PWD application also requires that professionals providing an assessment of the applicant have a good understanding of the eligibility requirements. The application form and accompanying guidance for professionals can be improved to provide greater clarity.

The process requires the applicant to have access to a physician who can provide details on the applicant's medical condition and an assessment of their functional capacity. This process is more difficult for those without a family physician. This requires the applicant to find a physician that is willing to complete the form for them and who is familiar enough with their condition to accurately complete the assessment.

- ◆ The disability assistance program demands that frontline workers process a high volume of requests, understand and apply the eligibility rules and provide services to clients consistently and promptly. Various stakeholder interviews identified that these interactions can be stress-inducing for clients who may have to meet a range of administrative requirements or recount difficult life circumstances to confirm their eligibility for benefits. We also heard that some clients may limit their contact with the ministry because of these concerns. To address these concerns the ministry has some training in place for frontline workers. For example, they offer staff training on active listening and the duty to accommodate. However, we found that more training can be done to help improve clients' experiences.

**RECOMMENDATION 2:** *We recommend that the Ministry of Social Development and Social Innovation ensure that its online information on PWD designation eligibility is clear and easy to find.*

**RECOMMENDATION 3:** *We recommend that the Ministry of Social Development and Social Innovation review the PWD application process to address the risk that some applicants may not have a family physician, and improve the clarity of the PWD application form. This includes developing guidance to help clients, physicians and assessors in completing the application.*

**RECOMMENDATION 4:** *We recommend that the Ministry of Social Development and Social Innovation ensure that frontline staff training is relevant, current and addresses topics such as client-centred services, accommodation and working with people who have a wide-range of barriers and disabilities.*

## Difficulty with telephone and online access to services

In addition to providing face-to-face service in community and regional offices, the ministry offers some services through two indirect or self-serve options: an online self-service application and a toll-free telephone service channel. Managing a large volume of service requests with finite staff resources is challenging for the ministry. The move to expanding services through both the telephone and online access is expected to enhance the efficiency and effectiveness of the system. However, we found issues with the consistency and effectiveness of the existing telephone service and with the accessibility of the online application process.

- ◆ The ministry's toll-free telephone service is inconsistent and sometimes results in excessive wait times and dropped calls for clients. Because many clients do not own phones (or they use phones with limited minutes), long wait times can be particularly difficult. We were told that clients sometimes receive incorrect information regarding what they may be eligible for when calling the toll-free service.

To better manage service request volumes, the ministry has a number of strategies for prioritizing client requests, including the use of call-back systems (where clients who call for service are promised a call-back within 24 hours to have their request for service completed). These have had varying success given many clients' challenges with phone use and phone access. For example, we found in one community that clients (using a telephone from a trusted third party site) were unable to complete their service request over the telephone because of the ministry's 'call back' protocol. As a result, at this site there was a regular trend of clients not receiving the benefits or services for which they may be eligible for.

- ◆ As shown in Exhibit 4 earlier, completing the online Self-Serve Assessment and Application is a mandatory initial step for new applicants to access income and disability assistance. The application requires details of the applicant's financial earnings and assets, current and past employment status, and other personal details the ministry uses to assess eligibility for income assistance. Clients can access the online application anytime by computer over the Internet. However, the application is available in English only, requires that the applicant have access to and the ability to use a computer and email, and is long and redundant in places. There is also limited information detailing the eligibility rules for disability assistance such as the higher level of asset and earnings exemptions allowed for individuals intending to apply for the PWD designation. This increases the risk that applicants do not understand the rules for allowable assets and could deplete financial resources unnecessarily.

In our regional visits, we were told that staff will sometimes help clients fill out the application online by using the computer in the office waiting area. However, this approach relies on the client to request this assistance. We also found that one site did not have a computer, and other sites lacked privacy for individual computer use.

**RECOMMENDATION 5:** *We recommend that the Ministry of Social Development and Social Innovation develop and implement additional strategies to ensure that timely, accurate and consistent services are provided through the toll-free telephone service.*

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**RECOMMENDATION 6:** *We recommend that the Ministry of Social Development and Social Innovation improve the online application process to address redundancies and improve the clarity of guidance for applicants.*

### Physical accessibility barriers

In our site visits, we identified physical barriers at a small number of service delivery sites that would impact their physical accessibility. An audit by Shared Services BC in 2012 also reported physical accessibility issues with a small number of sites.

The ministry does not perform regular physical site compliance audits to ensure its buildings and spaces provide unhindered access for people with disabilities. Such assessments are, in part, the responsibility of Shared Services BC.

The ministry lacks a formal feedback mechanism with third-party service delivery sites to monitor and correct issues related to physical accessibility.

**RECOMMENDATION 7:** *We recommend that the Ministry of Social Development and Social Innovation work with trusted third parties and Service BC to identify and address physical accessibility issues for clients.*

## THE INTEGRITY AND TIMELINESS OF ELIGIBILITY DECISIONS

### Overall Conclusion

*Risks are not being fully managed to ensure benefits are provided only to eligible individuals and eligibility decisions are made in a timely manner*

The eligibility criteria and administrative requirements for PWD support are prescribed in legislation. As such, the ministry is obligated to provide assistance to those who meet the eligibility criteria. These pertain to:

- ◆ Financial eligibility – To be eligible for the PWD designation, a client must meet the financial eligibility criteria in addition to the PWD designation criteria. Financial eligibility is determined through a series of application and intake processes that require the applicant to verify financial and personal information (e.g. their employment status, income and asset levels, living costs, marital status and family size).
- ◆ PWD designation eligibility – Once a client is deemed financially eligible for income assistance, he or she may apply for the PWD designation. All PWD applications are centrally adjudicated by the Health Assistance Branch. Adjudication is the process in which ministry staff assess the evidence given in a person's PWD application form against the PWD eligibility criteria, and then determine whether the applicant is eligible. Determining eligibility for the PWD designation demands that the ministry adjudicator weigh the evidence of the applicant's circumstances to determine whether the client meets the legislated criteria.

The ministry should be using systems and processes that would reasonably ensure that only eligible individuals are receiving the services, and that those services are being delivered in a timely way. The ministry should also have systems that detect errors in payments to ensure clients receive the correct amount of assistance.

The ministry has a number of systems and processes in place to assess the financial eligibility of its clients and to proactively monitor, detect and recover overpayments. However, the ministry's system and processes for determining initial and ongoing eligibility for the PWD designation can be improved. The audit found that there is a risk that some individuals may be in receipt of PWD benefits that do not qualify. In addition, there is a risk that clients whose condition has worsened are not receiving services that they would benefit from.

As well, the ministry cannot demonstrate that eligibility decisions are timely. The ministry has several service standards related to the timeliness of eligibility decisions, but it is not consistently measuring and reporting its performance against all of these standards. At the time of our audit, the ministry had limited information on whether clients are receiving benefits in a timely manner. This makes it difficult for the ministry to identify areas where processes could be streamlined.

## Key Findings and Recommendations

### *The ministry can demonstrate that financial eligibility decisions are accurate, but it is not fully managing the risks of PWD eligibility designation decisions*

The ministry has systems for ensuring that initial financial eligibility decisions comply with legislation and regulations. The ministry also has systems for detecting changes in client financial eligibility and adjusting benefits as appropriate.

However, for PWD designation eligibility decisions, the ministry does not conduct quality reviews of adjudicators' decisions, except in the case where there is a new adjudicator, a "second read" is carried out. In our view, the lack of quality reviews for the majority of cases increases the risk that adjudication decisions might be made inaccurately.

Although the PWD designation eligibility system gives denied applications the opportunity to be re-assessed by the Reconsideration Branch (see sidebar), this control relies on the applicant applying for the reconsideration. Staff are expected to advise the applicant of their right to reconsideration. It is not an automatic option provided by the ministry, and it obligates the applicant to meet a series of formal administrative requirements to initiate the process. Because the reconsideration process captures only denials, it does not provide the ministry with assurance that the PWD approval decisions made at the Health Assistance Branch are made in accordance with the legislation. There is a risk that applicants receiving the PWD designation may not meet the designation eligibility criteria and may be receiving services for which they are not entitled.

#### Reconsideration of denied applications for the PWD designation

Individuals who have had their PWD application denied can apply to the ministry's Reconsideration Branch for a review of both the original PWD denial decision and any new evidence to re-assess the merits of the application.

## *The ministry has no periodic PWD eligibility review process with which to understand the ongoing status and needs of its clients*

The Health Assistance Branch has a system for setting up periodic eligibility review dates for every client who has the PWD designation. However, we found that these eligibility reviews are not being performed. In our view, this poses two risks:

- ◆ that some clients whose conditions have improved and who no longer qualify for PWD benefits remain on the system; and
- ◆ that some clients whose conditions have worsened are not receiving the full support they are eligible to have.

Lack of a risk-based approach to understanding its clients' ongoing eligibility for the PWD designation is preventing the ministry from reasonably ensuring it is serving only those clients who are eligible for PWD benefits and supports.

## **RECOMMENDATION 8:** *We recommend that the Ministry of Social Development and Social Innovation develop and implement a risk-based approach for reviewing initial and ongoing client eligibility for the PWD designation, to better ensure the program is serving only those clients who are eligible for benefits and supports.*

### *Benefit overpayments are monitored, detected and recovered*

The ministry monitors and detects benefit overpayments. Its Prevention and Loss Management Branch is responsible for carrying out compliance reviews of the ministry's caseload (including disability assistance cases), to ensure that benefit payments are monitored for accuracy.

The ministry adopts a risk-based approach in selecting files for such reviews. The focus of this approach is to identify any changes in a person's financial situation that would result in an overpayment to the individual. The ministry then seeks to recover these benefit overpayments. While underpayments can also be detected through this process, the system is primarily focused on identifying potential overpayments. When underpayments are detected, there are processes in place to adjust benefit payments accordingly for clients.

The ministry can enhance the current system for monitoring, detecting and issuing benefit overpayments to identify underpayments. While the ministry believes there is a low risk that benefit underpayments will go undetected by either frontline staff or clients themselves, the ministry can do further work to confirm this assumption.

## *The ministry is unable to demonstrate that all its eligibility decisions are timely*

The ministry has five service standards that apply to the timeliness of eligibility decisions (see Exhibit 5).

<b>Exhibit 5:</b> The ministry's standards for timeliness of service		
Eligibility process	Service standard	Service standard results
Financial eligibility: Application intake: needs assessment	<b>1 business day</b> for ‘immediate need’ requests (applicants who are fleeing from abuse or have an immediate need for food, shelter or urgent medical attention)  <b>5 business days</b> for service requests that are not classified as “immediate need”	Unable to demonstrate results
Financial eligibility: Intake: Determination of financial eligibility for assistance	<b>5 business days</b> not including time waiting for clients to obtain information	Unable to demonstrate results
PWD designation: eligibility decision (adjudication)	<b>90 business days</b> (A triage system is used for processing urgent applications, which are given priority for adjudication.)	Met
PWD designation: Reconsideration of eligibility decisions	<b>10 business days</b>	Not fully met. (Subsequent to the audit field work, the Ministry reported improved results)

Source: Compiled by the Office of the Auditor General

We found that the ministry is not reporting its performance against the three service standards related to financial eligibility. The reporting system for these standards was not fully in place at the time of our audit as the ministry was transitioning from one measurement process to another. The ministry is, however, measuring and publicly reporting on its two service standards for timely PWD adjudication and reconsideration decisions. According to the ministry, it met its 90-day service standard for PWD adjudications in 2012/13, but not the standard for timely reconsideration decisions.

The ministry also has systems and processes to prioritize applications to identify individuals who require immediate service for both financial eligibility and the PWD adjudication process (i.e. applicants who have been hospitalized or are fleeing abuse).

**RECOMMENDATION 9:** *We recommend that the Ministry of Social Development and Social Innovation report on the timeliness of eligibility decisions by measuring and reporting results against the service standards.*

## PROGRAM RESULTS: DEFINING AND EVALUATING OUTCOMES

### Overall Conclusion

*The ministry has not completed a comprehensive evaluation of the disability assistance program and is unable to demonstrate that the program is contributing to improving the lives of clients*

The ministry's disability assistance program is one of a number of supports for addressing the complex needs of vulnerable citizens.

To know whether its program is successfully meeting its objectives, the ministry should be evaluating the results achieved (outputs and outcomes) relative to the resources going in and the expectations set. In the case of delivering PWD services, the ministry should have a comprehensive evaluation framework in place, with clear and measureable objectives. This way, the ministry would be able to understand whether its services are meeting its clients' needs and contributing to improving their lives.

We found that the ministry has not undertaken a full evaluation of its program outcomes. The ministry has not clearly defined objectives for clients nor confirmed a suite of standard measures and corresponding targets to gauge results. For example, the ministry has not defined clear objectives and measurable targets that define what it means to meet the basic needs of clients. It has, however, adopted a range of indicators, and consulted with stakeholders, to track some aspects of client outcomes. Ministry information indicates that given the level of assistance provided, some clients' basic needs may not be met. Clients may need to turn to charitable donations, family support and other sources of assistance to obtain appropriate shelter and other basic necessities.

The ministry has not yet fully evaluated the success of its employment programs. In terms of tracking the health and social outcomes of the disability assistance program, the ministry has developed some preliminary indicators but has not fully evaluated these results. As a result, the ministry has limited information on whether its actions are addressing clients' needs and improving outcomes in these areas.

Such information would help the ministry identify gaps and overlap with other government and community programs that serve this same group of citizens. It would also help decision-makers better understand the impact of policy choices regarding the amount and type of assistance provided to clients.

## Key Findings and Recommendations

*No clear measure of program success has been established, but indications are that clients may be at risk of not having their basic needs met*

The ministry provides a monthly amount to disability assistance clients to meet basic needs for shelter and other goods such as food, clothing and other basic living necessities. Clients may also be eligible for supplemental benefits to assist with health and other living expenses. Clients are able to accumulate assets and earn up to \$800 a month in employment income without reducing their benefit amount. Other sources of income are deducted from the monthly amount on a dollar-for-dollar basis, unless doing so is exempted in the legislation.

The ministry has not clearly defined objectives relative to meeting clients' basic needs nor has it confirmed a suite of standard measures and corresponding targets to gauge results. For example, the ministry has not defined what standard of living the assistance is intended to achieve for clients.

The ministry has consulted with stakeholders in order to work together to enhance its programs and develop best practices in areas like employment, income assistance, housing and housing supports, and community supports. These consultations provide the ministry with information on the challenges faced by people with disabilities.

The ministry has a range of indicators to monitor the program (see Exhibit 6). It also reads evaluations of PWD financial support done by external agencies (see sidebar). Both of these sources of information indicate that clients may be at risk of not having their basic needs met. Given the level of assistance provided, clients would likely need to turn to charitable donations, family support and other sources of assistance to obtain appropriate shelter and other basic necessities. The full extent of this risk is unclear, as client access to other supports (charitable donations, community aid, family and so on) can vary significantly. This makes the level of unmet need difficult to fully measure. However, by expanding its evaluation efforts – for example, by measuring the proportion of its clients living in social or non-profit housing or living with the support of family – the ministry could better estimate the level of risk.

### What external evaluations indicate about the program

We reviewed several evaluations done by agencies external to the Ministry of Social Development and Social Innovations, including those found in academic papers and other groups' papers and proposals advocating for a specific policy change.

There is no single comprehensive evaluation of the program. Each of the evaluations used different measures and standards to determine what constitutes meeting basic needs. We also found that many of the evaluations focused on describing what could be purchased for the basic-support dollar amounts granted, rather than on analyzing clients' estimated income from other sources (such as tax credits and other supplementary assistance provided by the ministry).

Nonetheless, the evaluations taken together do indicate that the shelter and support amounts provided by the ministry do not allow clients – without the support of other programs (e.g. long-term care), community organizations or family support – to meet their basic needs. In this way, the external evaluations are useful in showing the ministry that clients who do not have access to other supports outside PWD assistance could be at risk of substandard housing, homelessness and malnutrition.

**Exhibit 6:** Sample of the measures the ministry uses to determine whether clients' basic needs are being met

Measurement	Ministry's reported results	About client outcomes
<ul style="list-style-type: none"> <li>◆ The number of clients paying more for shelter than the shelter maximum.</li> </ul>	<ul style="list-style-type: none"> <li>◆ 69% of clients.</li> </ul>	<ul style="list-style-type: none"> <li>◆ A majority of clients may be using money intended for food and clothing to cover the balance of their shelter costs.</li> </ul>
<ul style="list-style-type: none"> <li>◆ The percentage of market housing that can be purchased with the shelter amounts across all BC regions.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Using Federal census data, the ministry estimates the cost and availability of shelter units in the lower price range across BC (at or below the 25th and 33rd percentile). Calculations are made for rent plus utilities for each of bachelor, 1, 2, 3, and 4 bedroom units for urban and rural regions of different sizes.</li> </ul>	<ul style="list-style-type: none"> <li>◆ This analysis is used to identify whether a client can obtain housing with the shelter amount. It does not indicate what level of quality that housing would include. The ministry has not set any targets relative to an ability to obtain market housing within a particular cost range.</li> </ul>
<ul style="list-style-type: none"> <li>◆ The number of clients claiming earned income.</li> </ul>	<ul style="list-style-type: none"> <li>◆ The ministry reports that in 2012/13, 14.9% of clients claimed earned income under the earnings exemption.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Some clients are supplementing their income with employment.</li> </ul>
<ul style="list-style-type: none"> <li>◆ Analysis of the basic amounts for shelter and support against an established low income threshold.</li> </ul>	<ul style="list-style-type: none"> <li>◆ The PWD shelter and support amounts for a single individual would fall below the after-tax Low Income Cut-off (LICO) threshold. When available provincial and federal tax benefits are included, a single person on PWD averages 65% of the after-tax LICO.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Established by Statistics Canada, the LICO is a low income threshold below which a family will likely devote a larger share of its income on the necessities of food, shelter and clothing than the average family. The LICO assumes that the average family spends 43% of its after-tax income on food, shelter and clothing, and that families spending 20% more than the average (63% or more) on these items would be in 'straitened conditions'.</li> <li>◆ This is an indicator of whether clients can access basic necessities with their given income level.</li> </ul>
<ul style="list-style-type: none"> <li>◆ The number of clients with no fixed address as a surrogate indicator of homelessness.</li> </ul>	<ul style="list-style-type: none"> <li>◆ April 2013 – 1267 or approximately 1% of clients had no fixed address, 801 of which did not receive any shelter allowance.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Not having a permanent address can be the result of a number of circumstances, such as moving residences.</li> </ul>
<ul style="list-style-type: none"> <li>◆ Comparison of the rates in BC with other provinces.</li> </ul>	<ul style="list-style-type: none"> <li>◆ BC disability assistance rates are 5th of all provinces.</li> <li>◆ For a single person the BC rate is \$906.42 which is below those of Ontario (\$1,075), Alberta (\$1,588), Saskatchewan (\$1,217) and Quebec (\$918).</li> </ul>	<ul style="list-style-type: none"> <li>◆ This is a relative measure of the reasonableness of rates as compared to other jurisdictions. However, these comparisons do not account for differences in the cost of living in each province.</li> </ul>

Measurement	Ministry's reported results	About client outcomes
<ul style="list-style-type: none"> <li>◆ Comparison of the asset and earnings exemption levels in BC with other provinces.</li> </ul>	<ul style="list-style-type: none"> <li>◆ Third in Canada for earned income exemptions.</li> <li>◆ The only province with an annualized earnings exemption option.</li> <li>◆ BC allows clients the highest allowable trust contribution when compared to Alberta, Saskatchewan, Manitoba, and Ontario.</li> <li>◆ BC's gift policy allows less to be exempt compared to Alberta, Ontario, and Manitoba.</li> </ul>	<ul style="list-style-type: none"> <li>◆ These are relative measures of the reasonableness of asset and earnings exemption policies as compared to other jurisdictions. However, these comparisons do not account for differences between provinces in either the cost of living or the condition of the labour market.</li> </ul>

Source: Compiled by the Office of the Auditor General of British Columbia

*The ministry has not yet fully evaluated employment outcomes and therefore cannot demonstrate that the employment programs are improving client outcomes*

In looking for meaningful employment, people with disabilities may face discrimination and challenges in ensuring that their needs are accommodated by employers. The ministry takes the position that client outcomes are ultimately improved when individuals with disabilities are given employment opportunities, which can increase their income, independence and inclusion in the community.

The ministry contributes to improved employment outcomes by, for example, delivering its employment program and engaging employers to identify ways to reduce barriers.

The ministry uses several measures to evaluate success in this area, including the number of clients who have obtained employment and the income of clients who no longer need disability assistance because of employment. As well, the ministry compares its employment supports with those of other jurisdictions; reviews academic and other research; and consults with key stakeholders to gain insight into results.

We found that the ministry tracks current clients accessing employment and training services through its employment program. However, at the time of our audit, the ministry had not evaluated whether these employment services result in improved client outcomes. The ministry is now in the process of doing that.

Because the PWD designation is not based on a person's ability to work – and because clients' circumstances and conditions vary considerably – it is challenging for the ministry to define success in terms of employment outcomes for clients (for example, what proportion of clients that would benefit from employment programming are accessing employment programs and gaining meaningful employment?). Nonetheless, having a meaningful estimation of how many clients can reasonably be expected to achieve employment and independence is important. It would give the ministry a better baseline to measure their impact and greater insight into the characteristics of their clients.

## *There are limitations in clients' ability to access some health services*

There are a number of health supplements provided to disability assistant clients (such as basic dental work and mobility aids). The range and amount of health supplements are set out in the regulations. The program is not designed to provide assistance to meet particular needs outside of what is allowed for under the legislation. For example, if a client needs to rent a scooter because the one they own is in need of repair, there is no provision to allow for this assistance. They would have to pay for that rental themselves or access the service through charity. If a service is not available this can impose a hardship on clients. For these reasons, the ministry must identify and address emerging needs through legislative and/or policy changes.

To do this, the ministry compares the assistance provided in British Columbia to that provided in other jurisdictions, researches trends, and consults with stakeholders to identify concerns about the current range of supplements.

We found:

- ◆ Many of the supplements such as mobility aids and other medical supplements are fully paid for by the ministry and provided directly to the client through a third-party supplier, such as a medical supply store.
- ◆ For other supplements, such as chiropractic or physiotherapy services, the amounts provided are to top up health services provided by the Ministry of Health or the health authorities. In these cases, staff of the Ministry of Social Development and Social Innovation confers with Ministry of Health staff to identify gaps and set the benefit amounts. However, even the combined funding may not always be sufficient.
- ◆ Some supplements are limited by a set dollar amount, with the ministry being the main government provider of the services. Examples include the extraordinary nutritional supplements, Dental and Orthodontic Services, and Optical and Hearing Services. The amounts are set within the available budget and, as such, the ministry does not necessarily fully fund these services. In these cases, the client may pay a part of the health service or may rely on charity to access the service (see sidebar).

## *The ministry is not tracking indicators related to the health and social well-being of clients and we found that coordination with other agencies is needed*

In providing clients with assistance for basic needs, employment and other supports as well as supplementing health services, the ministry is making a contribution to the economic, health and social well-being of this population. However, the ministry is not the only agency contributing to these outcomes. Therefore in partnerships with others, the ministry should define and track indicators to inform them on how well clients are doing in these areas.

We found that that there is no comprehensive tracking of indicators related to clients' health and social well-being. Because the ministry is only one of many agencies contributing to these outcomes, measurement is a shared responsibility. Therefore, the ministry needs to partner with other key agencies – such as the Ministry of Health,

## Dental care: an example of limited access

We heard that access to dental benefits is a particular concern in terms of the limited dollar supplement provided and the impact of that on the access to services and the outcomes for clients. The amount provided for non-emergency dental work is approximately 60% of what dentists typically charge for their services. As a result, clients may be billed by dentists for the outstanding balance (or dentists are covering some costs themselves or refusing service). In some situations, clients may end up receiving a less costly procedure rather than what they really need.

Community Living BC and BC Housing – to periodically measure how well clients are doing relative to these outcomes. For example, tracking indicators of health status in terms of nutritional intake, housing and voluntary activities would give the ministry a better understanding of its contribution to the overall health and social status of the population it serves. Having such results would also give the provincial government important information about where gaps in services exist.

**RECOMMENDATION 10:** *We recommend that the Ministry of Social Development and Social Innovation develop a comprehensive evaluation framework for the PWD program that:*

- ◆ *sets objectives, targets/benchmarks to define what it means to meet clients' basic needs;*
- ◆ *sets standard measures to track whether clients can access appropriate shelter, food and other necessities;*
- ◆ *establishes a baseline and targets to measure employment success for clients; and*
- ◆ *in partnership with other agencies defines, tracks and monitors a range of health and social indicators to assess this broader range of outcomes.*

**GIVEN BOTH THE IMPORTANCE** of providing disability assistance to the significant number of clients in British Columbia, and the ministry's current focus on exploring opportunities to improve the disability assistance system, we will continue to monitor the ministry's progress. We plan to follow up on the ministry's responses to our recommendations and to report again in the fall of 2015.



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