LETTER TO GOVERNMENT

Support people with disabilities by preventing Canada Disability Benefit clawbacks

**INSTRUCTIONS (delete before using): This letter is intended to serve as a template that can be tailored to your organization and your jurisdiction. Feel free to include additional insights, findings, updates, and stories of lived experience, to further support your advocacy.**

**Dear** [*Paste names of Premier and Ministers from your jurisdiction’s Contact List, as well as other applicable contacts*]

On behalf of [*insert organization(s) name here*], we are writing to ask that the provincial government take proactive action to ensure the full value of the new Canada Disability Benefit (CDB) reaches people with disabilities accessing our province’s social assistance programs. If the government takes no action to protect the value of the CDB, recipients who also receive social assistance will experience a dollar-for-dollar reduction in their social assistance benefits.

**We must address poverty among people with disabilities**

In 2022, 1,110,000 people – or 12.3 per cent – of people aged 15 and older with disabilities lived below the poverty line in Canada.[[1]](#footnote-1) The poverty rate rises to 29.4 per cent for single individuals with disabilities.

Looking at the social assistance caseload in Alberta, there were 18,000 cases and 26,440 beneficiaries of the Barriers to Employment (BFE) stream of Income Support and over 72,200 cases in the Assured Income for the Severely Handicapped (AISH) program in 2022-23. Of note, 53 per cent of BFE beneficiaries and 86 per cent of AISH recipients were singles individuals with disabilities.[[2]](#footnote-2)

People with disabilities disproportionately live in poverty because their welfare incomes have long been inadequate*.* In Alberta, single individuals with disabilities have been consistently living in poverty, shown by the change in total welfare incomes as a percentage of Canada’s Official Poverty Line (the Market Basket Measure) from 2018 to 2023. For a BFE recipient in 2018, total welfare income was only at 43 per cent of the poverty line, and this increased slightly to 44 per cent of the poverty line in 2023. For comparison, Statistics Canada defines “deep income poverty” as income of less than 75 per cent of the poverty line. For an AISH recipient in 2018, total welfare income was at 82 per cent of the poverty line and decreased to 81 per cent of the poverty line in 2023.[[3]](#footnote-3)

It is also worth noting that the poverty line does not account for the additional cost of living faced by people with disabilities, so poverty among this group is likely underestimated.

**The Canada Disability Benefit is desperately needed**

The federal government recently published a draft regulation containing design details for the new CDB.[[4]](#footnote-4) With eligibility tied to receipt of the Disability Tax Credit, the CDB is expected to provide about 600,000 low-income people with disabilities aged 18-64 with up to $200 per month. The federal government will begin providing payments to eligible Canadians starting in July 2025.[[5]](#footnote-5)

The CDB must be considered asupplementto welfare incomes, rather than a replacement for provincial assistance. Any clawback of social assistance would be contrary to the intended purpose and spirit of the CDB and would come at the expense of already marginalized people.

**The Alberta government must act to avoid clawing back the value of the Canada Disability Benefit**

Several jurisdictions have already agreed not to claw back the CDB, including Manitoba, Newfoundland and Labrador, Nova Scotia, and Nunavut. Some have decided to augment the new benefit, such as Newfoundland and Labrador announcing a $400 per month top-up to the CDB.[[6]](#footnote-6)

A clawback of social assistance benefits can be avoided simply by changing social assistance regulations. Implementing this change is administratively feasible and would come at no cost to the provincial government. Specifically, the words “a Canada Disability Benefit” should be added as a new sub-section under section 1(1) of Schedule 2 - Exempt Financial Resources of the *Alberta Income Support, Training and Health Benefits, Alta Regulation 122/2011*.[[7]](#footnote-7) In addition, *The Assured Income for the Severely Handicapped General Regulation, Alta Reg 91/2007* should be amended by adding the words “a Canada Disability Benefit” in a new subsection of Table 1 – 100% Income Exemptions.[[8]](#footnote-8) Ultimately, this regulation change would align with the treatment of similar federal benefits, such as the Canada Child Benefit. Failure to prevent a clawback would undermine intergovernmental cooperation to address poverty across Canada for years to come.

In addition, the introduction of the Canada Disability Benefit does not remove the responsibility of provincial governments to provide income security to people with disabilities.

Therefore, we ask that the provincial government:

1. Prioritize the well-being of people with disabilities and immediately make a public commitment that it will not claw back the CDB benefit amount from social assistance payments.
2. Commit to progressive investments to raise social assistance rates and other provincial benefits until we have eliminated poverty among people with disabilities.

Thank you for your attention to this matter. We await your response.

Sincerely,

[*add signatures*]

[*add cc list as appropriate*]

1. Statistics Canada. (April 26, 2024). Table 11-10-0090-01  Poverty and low-income statistics by disability status. <https://doi.org/10.25318/1110009001-eng> [↑](#footnote-ref-1)
2. Tabbara, M. (May 2024). *Social Assistance Summaries, 2023*. Maytree. <https://maytree.com/wp-content/uploads/Social_Assistance_Summaries_2023.pdf> [↑](#footnote-ref-2)
3. Laidley, J. & Tabbara, M. (July 2024). *Welfare in Canada, 2023.* Maytree. <https://maytree.com/changing-systems/data-measuring/welfare-in-canada/> [↑](#footnote-ref-3)
4. Government of Canada. (June 29, 2024). Canada Gazette, Part I, Volume 158, Number 26: Canada Disability Benefit Regulations. [Canada Gazette, Part 1, Volume 158, Number 26: Canada Disability Benefit Regulations](https://canadagazette.gc.ca/rp-pr/p1/2024/2024-06-29/html/reg2-eng.html) [↑](#footnote-ref-4)
5. Government of Canada. (April 2024). Overview of the Canada Disability Benefit. <https://www.canada.ca/en/employment-social-development/programs/disabilities-benefits.html> [↑](#footnote-ref-5)
6. CBC News. (June 08, 2024). N.L. Announces New Income Top-Up for People with Disabilities. [N.L. announces new income top-up for people with disabilities | CBC News](https://www.cbc.ca/news/canada/newfoundland-labrador/nl-disability-benefit-1.7228262) [↑](#footnote-ref-6)
7. Income Support, Training and Health Benefits Regulation, Alta Reg 122/2011, <https://canlii.ca/t/567dv> retrieved on 2024-05-30 [↑](#footnote-ref-7)
8. The Assured Income for the Severely Handicapped General Regulation, Alta Reg 91/2007, <https://canlii.ca/t/83d7> retrieved on 2024-08-06 [↑](#footnote-ref-8)