

The CNIB logo consists of the letters "CNIB" in a bold, yellow, sans-serif font, set against a black, brush-stroke-like background.The INCA logo consists of the letters "INCA" in a bold, yellow, sans-serif font, set against a black, brush-stroke-like background.

CNIB Briefing Note to HUMA on Bill C-22, *The Canada Disability Benefit Act*

About CNIB

Founded in 1918, CNIB is a non-profit organization driven to change what it is to be blind today. We deliver innovative programs and powerful advocacy that empower people impacted by blindness to live their dreams and tear down barriers to inclusion. Our work as a blind foundation is powered by a network of volunteers, donors and partners from coast to coast to coast.

The cost of sight loss

People who are blind or partially sighted incur extra costs associated with their sight loss every day. From public transit or rideshares – if they're available at all – to the price of taxi services, people with sight loss face increased costs simply for getting to and from work, going to medical appointments, or completing daily, essential errands. Add to that the cost of assistive technology for independent navigation and wayfinding, or getting information and communication, specialized accessible tools or applications, or veterinary care for guide dogs that are not otherwise covered – living with sight loss comes at a cost.

People living with a disability are more than twice as likely to live in poverty than those who live without a disability¹. Societal barriers are a daily occurrence for people living with a disability – living in poverty brings on another, compounding barrier to people with disabilities, who often don't have the means to meet their needs, purchase medication, or access life-changing assistive technology.

Current, inadequate social assistance programs provide a level of assistance that sits below Canada's Official Poverty Line. The current programs are splintered across the country, meaning a person with a disability receives different supports depending on where in the country they live.

Bill C-22 has the potential to bring almost one million people with disabilities out of poverty to live with dignity, autonomy, and independence. CNIB recommends Bill C-22 be passed as quickly as possible and include a regulatory process that is inclusive of the perspectives of people with disabilities to ensure that the Canada Disability Benefit is robust, flexible, and eligible for all people living with a disability.

¹ Persons with more severe disabilities (28%) aged 25 to 64 years were more likely to be living in poverty (as measured by the Market Basket Measure) than their counterparts without disabilities (10%) or with milder disabilities (14%). Statistics Canada. <https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2018002-eng.htm>

Social assistance as a trampoline

Social assistance should be a trampoline, not a safety net that entangles our community members into poverty. The Canada Disability Benefit must lift people out of poverty, but it cannot keep people from disabilities from working if they want to.

While CNIB is working to move the needle on employment levels, participants often say that existing income supports create a disincentive for recipients to gain employment and are a barrier to financial security. CNIB's 2018 International Levels of Employment Study reveals that almost half (46 percent) of those not looking for work indicated that it was because they were on disability assistance.

Specifically, people with sight loss reference claw backs built into social support as a disincentive, and fear losing healthcare and other benefits if they gain any degree of employment. For many, this creates impossible decision they must make. Either they must fight uphill against attitudinal barriers and stigmas seeking to get a job and become economically independent or they become trapped in woeful social assistance programs.

CNIB recommends the Government of Canada work with provincial and territorial counterparts to ensure the Canada Disability Benefit does not claw-back existing federal, provincial, and territorial benefits.

The Government of Canada must ensure that the development and implementation of the Canada Disability Benefit is done in tandem with a national employment strategy for people with disabilities. This strategy must take into consideration skills development, the cognitive load of job seeking, culture change of employers, accessibility enhancements to the workplace, a national assistive devices program, mentorship opportunities, and continuous professional development.

Replicating success

The Government of Canada does not have to look far and wide to find success for which the Canada Disability Benefit should mirror. The Canada Child Benefit (CCB), a program built on an evolution of successive social support programs with the goal of lifting children out of poverty, should be viewed as a program to which the Canada Disability Benefit should seriously consider. Like the CCB, the Canada Disability Benefit should be tax-free and indexed to inflation.

Similar to the *Universal Child Care Benefit Act*, the legislation that governs the Canada Child Benefit program, CNIB recommends that a mandatory minimum amount for which the Canada Disability Benefit will remit to those who are eligible is defined in the legislation. Any future changes to the financial amount to the Canada Disability Benefit, must be done in meaning consultation with the disability community. Government and Cabinet cannot unilaterally make changes to the amount of the program.

Strengthening the legislation for all

Bill C-22 can be strengthened to support more people living with a disability. The legislation caps the benefit to working aged people with disabilities – i.e., people under 65. However, the cost of disability does not disappear when someone turns 65. In fact,

the leading causes of sight loss, cataracts, and age-related macular degeneration, mostly occur in seniors. While federal programs such as GIS and OAS exist, the cost of sight loss mentioned above, can be an impediment to the financial security of a senior living with sight loss. The Canada Disability Benefit should consider this and remove age restrictions from the legislation.

The Canada Disability Benefit Act leaves many of the unknowns about the program to be developed in regulations. Yet it does not give timelines for when the regulations must be developed, or when the first payment is to be made. CNIB recommends that the legislation be amended to require that regulations must be developed within one year of the legislation coming into force, similar to timelines set for the first regulations under the *Accessible Canada Act*. Critically, the Government of Canada must also publicly commit to a date in which the first Canada Disability Benefit payment will be made, to show real commitment that this program will be implemented.


The importance of quick passage

In 2022, Canada's inflation rate rose at its fastest pace in almost 40 years. The price of nearly everything continues to rise, making life less affordable for all Canadians. The rapid increase in the cost of living presents even more challenges for Canadians with disabilities, many of whom are living on fixed income supports that are inadequate and not tied to inflation.

People with disabilities need a lifeline as soon as possible. Bill C-22 must be passed quickly with feedback from the disability community. Political stalling in the House of Commons and Senate will not be tolerated.

Recommendations

1. CNIB recommends Bill C-22 be passed as quickly as possible and include a regulatory process that is inclusive of the perspectives of people with disabilities to ensure the end legislation works for everyone who is impacted.
2. CNIB recommends the Government of Canada work with provincial and territorial counterparts to ensure the Canada Disability Benefit is not clawed-back by existing provincial and territorial support programs.
3. CNIB recommends that the Canada Disability Benefit is implemented in tandem with a national employment strategy for people with disabilities, so that the people with disabilities are not stuck in social assistance.
4. CNIB recommends that the Canada Disability Benefit should be tax-free and indexed to inflation.
5. CNIB recommends the legislation be amended so that a mandatory minimum amount for which the Canada Disability Benefit will remit to those who are eligible is defined in the legislation.
6. CNIB recommends that all future changes to the amount for which the Canada Disability Benefit will remit is done in meaning consultation with the disability community. Government and Cabinet cannot unilaterally make changes to the amount of the program.
7. CNIB recommends that Bill C-22 remove eligibility only for working aged people with disabilities.

- 
8. CNIB recommends that the legislation be amended to require that that regulations called out in Section 11 of the legislation must be developed within one year of the legislation coming into force.
 9. The Government of Canada must publicly commit to a date in which the first Canada Disability Benefit payment will be made, to show real commitment that this program will be implemented.