



# **The Canada Disability Benefit: Battling Abelism in Design and Implementation**

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# **The Canada Disability Benefit:**

## **Battling Ableism in Design and Implementation**

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### **Abstract**

The *Canada Disability Benefit Act* is legislation that, when passed, will establish a new statutory program intended to reduce poverty and support the financial security of working-age persons with disabilities. However, the *Act* is what is known as framework legislation meaning it sets out the high-level context and structure of the proposed program, but it does not provide any specific program details. The critical details of the new program—including eligibility conditions, the benefit unit and amount, and interactions with existing disability support programs—will, instead, be set out in regulations following stakeholder engagement. We use a benefit design framework to highlight the program elements that must be defined, highlighting the importance of a design and process that applies an inclusive and intersectional lens. On both substantive and procedural design questions, we see a risk that ableist assumptions might otherwise be embedded into benefit. The framework outlined in this paper should serve as a useful reference for all stakeholders involved in the benefit design process.

**Keywords:** Benefit design, Canada Disability Benefit, disability policy, persons with disabilities, poverty

**JEL:** H53, I38, J14, J18

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## Introduction

When it was introduced in the House of Commons, Bill C-22, *The Canada Disability Benefit Act*<sup>2</sup> was met with general support by all parties in the House. However, nearly all opposition parties noted that the text of the bill was so vague as to leave readers wondering what kind of new statutory program it would create.<sup>3</sup> The bill does not describe the eligibility conditions, the benefit amount, the frequency of payment, how it will interact with existing disability support programs, or how it might be treated for tax purposes. These, and effectively most, questions of benefit design and implementation have been left to the regulations once the *Act* comes into force.<sup>4</sup>

There are both pros and cons to this approach. On the one hand, leaving these details to the regulations provides both more long-term flexibility to enable governments to adjust the benefit in view of evaluations of its implementation and impacts and, in principle, provides opportunities for co-development and inclusive design processes. This latter point has been particularly emphasized by the sponsoring Minister, the Hon. Carla Qualtrough who has noted the design process may extend into 2024.<sup>5</sup> On the other hand, this approach leaves a great deal of uncertainty and increases pressure on participating stakeholders to engage with policymakers on myriad benefit design considerations, many of which are highly technical, create difficult trade-offs, and require detailed knowledge of the nearly impossible trifecta of disability, disability policy, and benefit design. Without this detailed knowledge, designers, and those advising on design, risk the very real possibility of designing a disability benefit that embeds judgements based on ableist assumptions. Ableism starts by imagining a lack of disability as the normal or default state for members of society and permits, or even promotes, the unequal or inferior treatment of persons with disabilities.<sup>6</sup> It is a form of prejudice and discrimination towards persons categorized as disabled. At the institutional level, it may manifest as discriminatory and harmful policy and programmatic decisions that reduce the inclusion and well-being of persons with disabilities.

In this paper, we describe a benefit design framework that is modeled on the existing general technical frameworks for policy design,<sup>7</sup> but which also integrates the emerging literature on

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<sup>2</sup> Canada, Parliament, Bill C-22, *Canada Disability Benefit Act*, 1<sup>st</sup> Session, 44<sup>th</sup> Parliament, 2023.

<sup>3</sup> Canada, Parliament, *Housing of Commons Debates*, 44<sup>th</sup> Parliament, 1<sup>st</sup> Session, Volume 151, No. 098, 20 September 2022, at 7397 (Kusie), 7401 (Chabot), and 7404 (Zarrillo).

<sup>4</sup> At the time of writing, Bill C-22 had passed third reading in the House of Commons and was under study by the Senate.

<sup>5</sup> Canada, *Supra* note 3, at 7392 (Qualtrough).

<sup>6</sup> Nario-Redmond, Michelle R. *Ableism : The Causes and Consequence of Disability Prejudice* (Hoboken, New Jersey: Wiley Blackwell, 2020).

<sup>7</sup> Congress of the United States, Concepts in welfare program design; a volume of studies. Prepared for the use of the Subcommittee on Fiscal Policy of the Joint Economic Committee, Congress of the United States. August 20, 1973; Eugene Bardach and Eric M. Patashnik, *A practical guide for policy analysis : the eightfold path to more effective problem-solving*, Fifth edition. ed. (Thousand Oaks, California: CQ Press, 2016); William N. Dunn, *Public Policy Analysis : An Introduction*, Fifth edition. ed. (Abingdon, Oxon ; Routledge is an imprint of the Taylor & Francis Group, an informa business, 2016); Lindsay M. Tedds, Daria Crisan, and Gillian Petit, *Basic Income in Canada: Principles and Design Features*, Research paper commissioned by the Expert Panel on Basic Income, British Columbia (2020), [https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Basic\\_Income\\_in\\_Canada\\_Principles\\_and\\_Design\\_Features.pdf](https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Basic_Income_in_Canada_Principles_and_Design_Features.pdf).

inclusive systems-based frameworks for policy design<sup>8</sup> and intersectional policy analysis.<sup>9</sup> We highlight the design issues that require detailed understanding of existing disability policies and discuss some key implications for persons with disabilities. We begin by describing the framework and then set out to apply the framework to the design and implementation of the Canada Disability Benefit. We offer a detailed analysis of the government's legislation, noting where the bill is silent or ambiguous relative to the benefit design framework. We then outline some directions for design to address the missing elements of the design framework, paying particular attention to the lessons that might be learned for benefit design from existing disability programs as well as observations from the COVID-19 pandemic. The pandemic years saw several new, if short-lived, income benefits created with particular consequences for persons with disabilities in Canada. We do not, in this process, make firm recommendations for an ideal design of the Canada Disability Benefit. Instead, our aim is to make clear the substantive and procedural issues that will have to be addressed. Pending the passage of Bill C-22, these outstanding issues of design and implementation should be addressed through the lens of disability inclusion and with attention to forms of ableism that may be implicit.

### **Benefit Design Framework: Structural Environment**

The Canada Disability Benefit will not be created or implemented in a vacuum. As argued by Petit<sup>10</sup>, before the technical design details of a benefit can be considered, the structural environment must first be established. The structural environment has three components: 1. the characteristics of the population in need and at risk of being in need; 2. the social and economic environment in which these persons live; and 3. the organization and interactions of the current system of income and social supports.

Fortunately, Bill C-22 establishes important context to inform any analysis. Section 3 of the bill establishes the population at risk as "working-age persons with disabilities." The preamble to the bill also sets out the social and environmental context: "working-age persons with disabilities are more likely to live in poverty because of because of economic and social exclusion." This exclusion is the result of interactions between the identities of individual Canadians with disabilities, systems that are not inclusive by design, and structural pathologies such as

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<sup>8</sup> David A. Green et al., *Basic Income and a Just Society: Policy Choices for Canada's Social Safety Net* (Montreal, QC: Institute for Research on Public Policy, 2023); Gillian Petit, "An Inclusive Systems-Based Analysis of a Basic Income for the Province of British Columbia" (PhD University of Calgary, 2022), <https://prism.ucalgary.ca/handle/1880/114635>.

<sup>9</sup> Anna Cameron and Lindsay M. Tedds, "Canada's GBA+ Framework in a (post)Pandemic World: Issues, Tensions, and Paths Forward," *Canadian Public Administration* 66, no. 1 (2023); Jennifer Robson and Lindsay M. Tedds, eds., *Impacts of COVID-19 on Women in Canada* (Royal Society of Canada, 2022).

<sup>10</sup> Gillian Petit, "An Inclusive Systems-Based Analysis of a Basic Income for the Province of British Columbia" (PhD University of Calgary, 2022), <https://prism.ucalgary.ca/handle/1880/114635>.

discrimination, marginalization<sup>11</sup>, barriers to employment<sup>12</sup> and barriers to full economic and social inclusion imposed by current disability support programs.<sup>13</sup>

We can add to this various data points to provide richer context. The most comprehensive survey on people with disabilities is the Canadian Survey on Disability (CSD), with the most recent year of data available being 2017.<sup>14</sup> Results of the CSD suggest that among Canadians of all ages with disabilities (6.2 million), 43% (2.7 million) have a severe or very severe disability, with women again over-represented among those with a severe disability. In terms of the working-age population (25-64), 20% (3.7 million) have a disability, with more women than men reporting a disability in all age groups. Generally, severity of disability rises with age. Among working-age adults, just over one in four persons with a disability (27%) have a severe or very severe disability. Persons with disabilities in Canada have a lower employment rate than those without. Among the 3.7 million working-age Canadians with any disability, only 59% have employment compared to an employment rate of 80% for those without a disability. Those who are working are far more likely to be working part-time compared to Canadians without a disability. Unsurprisingly, working-age persons with disabilities are much more likely live in poverty, with poverty rates 42% higher for those with milder disabilities and 283% higher for those with more severe disabilities, because the path to and maintenance of employment among those with disabilities is riddled with systemic barriers.

There are some existing income support programs aimed at adults with disabilities and the proposed Canada Disability Benefit must be considered with knowledge of that landscape. The current primary programs include Employment Insurance (EI) sickness benefits, Canada Pension Plan disability benefit (CPP-D), veterans' benefits, registered disability savings plans (RDSPs), the disability tax credit (DTC), and various provincial disability assistance programs. For the purposes of this section, we do not cover privately provided disability support programs. Instead, we focus on the key public programs that form a patchwork into which the Canada Disability Benefit will be introduced. For the sake of brevity, we set out the key parameters of these programs with a view to understanding the existing coverage of government programs for and transfers to persons with disabilities. For each program, we identify the type and key features of the benefit, summarize the eligibility criteria for receipt, and report the best available estimate of the headcount of annual recipients with disabilities. Readers will note these headcount estimates, which range from 169,000 to 1.2 million, reflect very different definitions of disability and reach different sub-populations of the 6.2 million Canadians with disabilities.

There are several important lessons to take away in reviewing Table 1. First, the largest disability income support programs offered by the federal government (EI Sickness, CPP-D, veterans'

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<sup>11</sup> The evidence for which is summarized in Robson and Tedds, *Supra* note 9, at 33-35.

<sup>12</sup> Michelle Maroto and David Pettinicchio, "Disability, Structural Inequality, and Work: The Influence of Occupational Segregation on Earnings for People with Different Disabilities," *Research in Social Stratification and Mobility* 38 (2014), <https://doi.org/http://dx.doi.org/10.1016/j.rssm.2014.08.002>.

<sup>13</sup> See, for example, Gillian Petit et al., "Less Income and More Hours of Work: Barriers to Work for Income Assistance Recipients in B.C.," SPP Briefing Paper, *The School of Public Policy Publications* 13, no. 16 (2020), <https://www.policyschool.ca/wp-content/uploads/2020/07/Less-Income-More-Work-Petit-et-al.pdf>.

<sup>14</sup> Stuart Morris et al., *Demographic, Employment and Income Profile of Canadians with Disabilities Aged 15 Years and Over, 2017* (Statistics Canada, 2018). Collection of 2022 data for the Canadian Survey on Disability is currently underway.

benefits) all target the working-age population who have had significant labour market attachment before the onset of their disability. In the case of veterans' benefits, this is further constrained to just the small but valued subset of the labour force who serve in the Canadian Armed Forces. Recall that there are an estimated 3.7 million working-age adult Canadians and that their labour force participation is significantly lower than that of Canadians without disabilities. Programs conditioned on labour market participation will always exclude important shares of Canadians with disabilities.

Second, the other two federal benefits, the DTC and the RDSP, while not conditioned on work, offer very modest support (and generally not in the form of a cash transfer) to recipients, not all of whom will themselves be persons with disabilities. The most recent federal *Report on Tax Expenditures and Evaluations* estimates that 42% of DTC tax credits benefit persons without disabilities, presumably caregivers to an eligible person.<sup>15</sup> Because the DTC eligibility criteria are focussed on medical certification of specific forms of impairment, the credit does not always align with other definitions of the severity of a disability. In fact, the same federal report finds that persons with mild and moderate disabilities do successfully claim the DTC and receive, on average, a somewhat larger tax savings compared to successful claimants with more severe disabilities. We also note that the tax incentives tied to these measures are designed such that the benefit increases as taxable income rises. This occurs in part because the DTC is a non-refundable tax credit meaning that the credit simply works to decrease taxes owed without resulting in a cash transfer to a taxpayer. The tax incentives of the RDSP (in the form of non-taxation of investment income), likewise rise with taxable income and, as a savings vehicle.<sup>16</sup> In fact, the Department of Finance estimates that 46% of persons with severe or very severe disabilities have no net income tax owing before the DTC and nine other tax credits and deductions they evaluated. This means that an important share of persons with disabilities receive no net benefit from these programs.

Finally, provincial disability programs, where they exist separately from general social assistance, are delivered as programs of last resort, meaning they are only accessible by those with essentially no other income, support, or assets. Table 1 also makes it clear that, other than EI sickness, the programs are all targeted to individuals who have a severe and prolonged disability, but each program defines disability differently and prescribes its own eligibility criteria. This means that eligibility for one program generally does not and cannot guarantee access to another program, a matter that has caused significant confusion amongst the population these programs are intended to serve.<sup>17</sup>

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<sup>15</sup> Department of Finance Canada. *Report on Tax Expenditures and Evaluations 2023* (Government of Canada, February 2023), <https://www.canada.ca/content/dam/fin/publications/taxexp-depfisc/2023/taxexp-depfisc-23-eng.pdf>

<sup>16</sup> Lower and modest income subscribers may benefit from a government-paid disability savings bond that is not conditional on private savings. However, the bond is capped at \$1,000 per year, which is half the maximum annual value of the matching grant on personal savings and substantially less than the combined value of the matching grant plus foregone taxes on the savings and investment income.

<sup>17</sup> David A. Green, Jonathan R. Kesselman, and Lindsay M. Tedds, *Covering All the Basics: Reforms for a More Just Society* (2021), <https://bcbasicincomepanel.ca>. One exception is the relationship between the RDSP and the DTC. An RDSP cannot be opened for a beneficiary who is not in receipt of the DTC.

**Table 1: Main programs targeted to working-age persons with Disabilities**

Program	Type	Ministry/Dept	Eligibility Conditions			Monthly Benefit <sup>18</sup>	Duration	Supplements	Annual Recipients
			Age	Conditions	Disability				
EI Sickness	Insurance	Employment and Social Development Canada	None	Accumulated 600 insured hours of work in the 52 weeks before the start of your claim	Unable to work for medical reasons but otherwise available for work	55% of insurable earnings to a maximum of \$638/week (2022)	Up to 18 weeks <sup>19</sup>	Family supplement if family income is below \$25,921 and receives the Canada Child Benefit	~169,000 <sup>20</sup>
CPP-D <sup>21</sup>	Insurance	Employment and Social Development Canada	18-65	General rule is that applicant must have been a contributor to CPP for at least 4 of the 6 years prior to application	Severe and prolonged mental or physical disability that prevents applicant from doing <i>any</i> type of paid work on a regular basis	\$524.64-\$1,464.83	Until age 65	None	336,000 <sup>22</sup>
Veterans Disability Benefits <sup>23</sup>	Entitlement based on service	Veterans Affairs	Not applicable	Veteran, current members of the RCMP or Canadian Armed Forces,	Medical condition or disability that is related to service	Varying amounts: Lifetime pain and suffering compensation <sup>24</sup>	Lifetime	Disability pension includes supplements for spouse and children.	Unknown

<sup>18</sup> Canada, "Canada Pension Plan Disability Benefits," 2022, accessed March 30, 2023, <https://www.canada.ca/en/services/benefits/publicpensions/cpp/cpp-disability-benefit/benefit-amount.html>.

<sup>19</sup> Increased to 26 weeks effective 18 December 2022. Benefit is indexed to inflation. Canada, "Government of Canada improves sickness benefits under the Employment Insurance system," 2022, accessed March 30, 2023, <https://www.canada.ca/en/employment-social-development/news/2022/11/government-of-canada-improves-sickness-benefits-under-the-employment-insurance-system1.html>.

<sup>20</sup> Canada, "Government of Canada improves sickness benefits under the Employment Insurance system," 2022, accessed March 30, 2023, <https://www.canada.ca/en/employment-social-development/news/2022/11/government-of-canada-improves-sickness-benefits-under-the-employment-insurance-system1.html>.

<sup>21</sup> The details for the CPP-D are provided. There is a separate program for those between the ages of 60 and 65, who meet the definition of disability under the CPP-D but who were already receiving CPP-D (CPP Post-retirement disability benefit, which pays a maximum monthly amount of \$524.64. There is also a CPP children's benefit, but the focus here is on benefits targeted at the working-age population.

<sup>22</sup> Canada, Annual Report of the Canada Pension Plan for 2019–20 fiscal year, Cat. No.: HS1-6E-PDF (Ottawa 2021), [https://www.canada.ca/content/dam/esdc-edsc/documents/programs/pensions/reports/annual-2020/2019-2020\\_CPP\\_Annual%20Report-ANNEX%20A-EN-20220613-Final-Minister\\_Seniors\\_Signed.pdf](https://www.canada.ca/content/dam/esdc-edsc/documents/programs/pensions/reports/annual-2020/2019-2020_CPP_Annual%20Report-ANNEX%20A-EN-20220613-Final-Minister_Seniors_Signed.pdf).

<sup>23</sup> Canada, "Disability Benefits," 2020, accessed March 30, 2023, <https://www.veterans.gc.ca/eng/financial-support/compensation-illness-injury/disability-benefits>.

<sup>24</sup> Canada, "Schedule 3 - Pain and Suffering Compensation," 2022, <https://duyxryp8txy49.cloudfront.net/pdf/resources/rates/psc-2022.pdf>.

				some civilians that service in WWII		or Disability pension <sup>25</sup>			
<b>Disability Tax Credit<sup>26</sup></b>	Entitlement	Canada Revenue Agency	None	Canadian Citizen or PR	Prolonged or permanent impairment (physical, psychological, neurological) that causes significant restriction to carry out activities of daily living.	Annual non-refundable tax credit. The base amount is 15% of \$8,870 <sup>27</sup> for 2022 (or a maximum credit for \$1,330.50 annually)	Typically need to re-apply ever few years	Supplemental Amount if applicant is under 18.	~1.2 million total claims of which 491,820 among working-age adults receiving the credit for their own disability <sup>28</sup>
<b>Registered Disability Savings Plan<sup>29</sup></b>	Personal Savings matched up to 300% by the Government of Canada	Canada Revenue Agency	<60	Must be eligible for the DTC	Same as DTC	As determined by beneficiary	As long as eligible for DTC	An additional \$1,000 a year in contributions if family income is considered low	254,000 <sup>30</sup>
<b>Provincial/territorial Disability Assistance Programs<sup>31</sup></b>	Entitlement	Provincial/territorial social assistance ministries	18-64	Funder of Last Resort Programs, significant income and asset tests	Specific definition varies by jurisdiction but generally limited to those with severe and prolonged	Varies by jurisdiction, all below official poverty lines	As long as eligibility is maintained	Varies by jurisdiction, but usually income various medical and health supplements	~800,000 <sup>32</sup>

<sup>25</sup> Canada, "Rates: Disability Pension," 2023, accessed March 30, 2023, <https://www.veterans.gc.ca/eng/resources/rates#dispen>.

<sup>26</sup> Disability Credit Canada, "The Disability Tax Credit Resource Guide," 2023, accessed March 30, 2023, <https://disabilitycreditcanada.com/disability-tax-credit-ultimate-resource-guide/>.

<sup>27</sup> Amount is indexed to inflation.

<sup>28</sup> Authors' calculations using data published by the Canada Revenue Agency for the 2021 tax year. Canada, "T1 Final Statistics 2021 edition (for the 2019 tax year)," 2021, accessed November 20, 2022, [https://www.canada.ca/en/revenue-agency/programs/about-canada-revenue-agency-cra/income-statistics-gst-hst-statistics/t1-final-statistics/2019-tax-year.html#tables\\_in\\_PDF](https://www.canada.ca/en/revenue-agency/programs/about-canada-revenue-agency-cra/income-statistics-gst-hst-statistics/t1-final-statistics/2019-tax-year.html#tables_in_PDF).

<sup>29</sup> Canada, "What is a registered disability savings plan (RDSP): Eligibility and Contributions," 2023, accessed March 30, 2023, <https://www.canada.ca/en/revenue-agency/services/tax/individuals/topics/registered-disability-savings-plan-rdsp/eligibility-contributions.html>.

<sup>30</sup> Department of Finance Canada, *Tax Expenditures and Evaluations 2023*, Government of Canada, <https://www.canada.ca/en/department-finance/services/publications/federal-tax-expenditures/2023/part-7.html#Registered-Disability-Savings-Plans>

<sup>31</sup> Note that several provinces and territories do not have a specific income assistance program for persons with disabilities.

<sup>32</sup> Based on Mohy Tabbara, *Social Assistance Summaries, 2021*, Maytree (2022), [https://maytree.com/wp-content/uploads/Social\\_Assistance\\_Summaries\\_All\\_Canada.pdf](https://maytree.com/wp-content/uploads/Social_Assistance_Summaries_All_Canada.pdf). for those reporting jurisdictions. The actual number of persons with disabilities receiving provincial income assistance will be higher. We are only able to report on the number of those receiving disabilities supports through these programs, yet several provinces do not have supports directly targeted to persons with disabilities.

					disabilities with no other forms of income				
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Combining the above-cited data on the frequency of disability among working-age Canadians with the program coverage shown in Table 1, it is clear that there are significant gaps in income support programs, with only a small portion of those with disabilities, and particularly those with severe or very severe disabilities, receiving benefits under these programs. Assuming that the target population for existing income support programs<sup>33</sup> are those Canadians (of all ages) with severe disabilities, the fact that 2.7 million Canadians (of any age) report such a disability, yet at most around 1.2 million people are recipients of any one disability support benefit, we see a very wide gap between the count of Canadians able to access disability benefits and the count of Canadians with a severe disability. Moreover, the largest set of programs, namely provincial income assistance, is also the least generous and most stigmatizing in terms of support offered. Even a cursory look at the current landscape of public supports for persons with a disability highlights the clear motivation for the Canada Disability Benefit (CDB) and highlights gaps in the existing patchwork of programs that must be taken into account in any design and implementation of the proposed new benefit. In short, the CDB cannot be simply layered on to any single existing benefit for adults with disabilities.

For example, if receipt of the Disability Tax Credit were used as the gateway into the CDB (replicating a flaw in the design of the RDSP), this would leave out persons with disabilities who are unable to navigate the application requirements. The DTC also has limited ability to reach those persons with disabilities who have insufficient taxes owing to benefit from the non-refundable nature of the DTC (who, again, represent 46% of tax-filers with severe or very severe disabilities). Simply making the DTC refundable, as some argue,<sup>34</sup> would fail to adequately address the more serious and substantive problems with the DTC. For example, the eligibility criteria define disability in terms of additional time to perform certain daily activities<sup>35</sup>, a measure intended to differentiate between those with more severe forms of disability from those with more moderate forms. Compared to other methods of disability adjudication, this approach is more stigmatizing for the applicant, as well as more burdensome and restrictive for medical professionals to document.<sup>36</sup> As we noted earlier in discussing a recent evaluation by the Department of Finance, it is not clear that the DTC is succeeding in restricting eligibility to only those with severe disabilities.<sup>37</sup> Even for those applicants who are able to obtain a DTC certificate, the CRA may only issue it for a period of time, requiring the tax-filer to re-apply to re-establish eligibility for the same severe and ongoing disability. Finally, we note that the CRA is the adjudicator of DTC claims and eligibility although it has no institutional expertise in disability policy, research, or stakeholder engagement, as compared, for example, to the Office of Disability Issues in Employment and Social Development Canada.

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<sup>33</sup> Only EI Sickness benefits include persons with mild or temporary forms of disability. All other programs included in our summary are aimed at persons with severe and prolonged disability.

<sup>34</sup> Michael Mendelson, *Options for a refundable disability tax credit for 'working age' persons* (Ottawa, Ontario: Council of Canadians with Disabilities, 2015).

<sup>35</sup> Canada, "Disability Tax Credit (DTC)," 2023, accessed March 30, 2023, <https://www.canada.ca/en/revenue-agency/services/tax/individuals/segments/tax-credits-deductions-persons-disabilities/disability-tax-credit/eligible-dtc.html>.

<sup>36</sup> Disability Advisory Committee, *First Annual Report of the Disability Advisory Committee*, (Ottawa, Ontario: Canada Revenue Agency, Government of Canada. 2019).

<sup>37</sup> Department of Finance. *Supra* at note 15.

To these concerns we have just described, we would add two troubling findings from recent federal studies. The Department of Finance reports that reassessment of claims for the DTC “usually results in an increase of the number of claimants by about 20% annually”.<sup>38</sup> This suggests that as many as one in five applications for the DTC are initially rejected by the tax agency, only to be later found eligible, at extra effort to the claimant.<sup>39</sup> Separately, the Auditor General of Canada has concluded that the CRA, along with other federal partners, has continued to struggle to deliver programs and benefits to eligible vulnerable Canadians, including persons with disabilities, and that the agency and partner departments do too little to track or address eligible non-participation.<sup>40</sup> That same report noted that tax-filing is often an obstacle to accessing government benefits, something the 2023 federal budget also acknowledged in committing to pilot automatic tax-filing for vulnerable Canadians so they can access benefits.<sup>41</sup> As we have argued previously,<sup>42</sup> while the tax system offers some important advantages for administering social programs, the CRA has important short-comings in its ability to administer complex benefits for vulnerable groups, like persons with disabilities. We should not count on the agency to be able to adequately take on the role of administering or delivering a new disability benefit and we should be skeptical of claims that the T1 return can be easily repurposed to serve as the gateway to a proposed new benefit.

### **Benefit Design Framework: Technical**

With the structural and environmental conditions facing the target population, we now turn to the technical elements of program design. Here, we build on existing work<sup>43</sup> on designing a basic income, to provide a framework for identifying and considering the relevant technical aspects of the design of the Canada Disability Benefit (CDB). We undertake this analysis in three stages. We begin by describing the framework in a general fashion. Next, we discuss what can be inferred (or not) from the text of the government legislation. We conclude by applying the technical framework to the question of CDB design. We pay particular attention to the lessons that can be learned for benefit design from the experience of the COVID-19 pandemic, when several new, if short-lived, income benefits were created with particular consequences for persons with disabilities in Canada.

All income support programs must first and foremost be designed to achieve their stated policy aim(s) and social purpose. In the case of the CDB, the government legislation sets out two distinct but related purposes at s3: “to reduce poverty and to support the financial security of

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<sup>38</sup> Ibid. See page 345 of the report.

<sup>39</sup> Some claimants may rely on third-part fee-for-service consultants to help them with a DTC application. The enduring number of for-profit firms who specialize in DTC applications on a fee for service model provides further evidence that many eligible Canadians find the application process too demanding to manage successfully on their own.

<sup>40</sup> Auditor General of Canada, *Report 1: Access to Benefits for hard-to-Reach Populations*

<sup>41</sup> The Hon. Chrystia Freeland, “A Made-in-Canada Plan: Strong Middle Class, Affordable Economy, Healthy Future” 2023 federal budget (Ottawa, Ontario: Department of Finance, Government of Canada, March, 2023).

<sup>42</sup> Gillian Petit et al., “Policy Forum: Re-Envisioning the Canada Revenue Agency-From Tax Collector to Benefit Delivery Agent,” *Canadian Tax Journal/Revue fiscale canadienne* 69, no. 1 (2021); Jennifer Robson and Saul Schwartz, “Policy Forum: Should the Canada Revenue Agency Also Be a Social Benefits Agency?,” *Canadian Tax Journal* 69, no. 1 (2021), <https://doi.org/10.32721/ctj.2021.69.1.pf.robson>.

<sup>43</sup> Tedds et al., *Supra* note 7. Used by Green et al., *Supra* note 17.

working-age persons with disabilities.”<sup>44</sup> We read this to mean that the benefit has both a *poverty-reduction objective* and that there is a *financial security objective for individual persons with disabilities* of working-age.

That adults with disabilities experience disproportionate risks of poverty is well-documented in the literature.<sup>45</sup> Furthermore, actual rates of material hardship and deprivation may be underestimated by standard poverty metrics that fail to account for the unique costs faced by persons with disabilities or differences in their family composition compared to other Canadians.<sup>46</sup> If the CDB is to achieve its poverty-reduction objective, then its design can be informed by experience and analysis of the design of previous poverty-reduction benefits. But given that it also has an objective related to the individual financial security of persons with disabilities, a phrase that is generally used to indicate the ability of a person to secure a basic quality of life<sup>47</sup>, more familiar approaches to poverty-reduction programs may not always be fit for purpose. Instead, the CDB merits careful consideration to the specific features, and the trade-offs of various design choices. Here, we describe a framework for identifying and considering those choices.

With the policy objective of the program being set in the legislation, the next considerations to be addressed are the specific operational parameters that will be used by the program in the following eight categories, none of which are specifically set out in the legislation, but which will have to be defined through the process of design and implementation:

- 1) *Sufficiency*: This parameter refers to the size of the basic benefit, especially in terms of the degree to which the benefit would cover a person’s essential living costs and raises essential design question. Will the disability benefit under the CDB sufficient to secure a basic quality of life? Should that standard be evaluated against existing national

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<sup>44</sup> Canada, *Supra* note 2.

<sup>45</sup> Katherine Wall, *Low Income Among Persons with a Disability in Canada* (Statistics Canada, 2017); Peri J. Ballantyne et al., "Poverty status of worker compensation claimants with permanent impairments," *Critical Public Health* 26, no. 2 (2016), <https://doi.org/10.1080/09581596.2015.1010485>; L. Bentley and B. Barr, "Poverty and Income Support Among Older People with Disabilities and Out of Work in the UK and Canada: Wen-Hao Chen," *European Journal of Public Health* 28 (2018), <https://doi.org/10.1093/eurpub/cky212.817>; Shannon Dinan and Normand Boucher, "Disability and Employment Policy in Canada: National Policy Variation for Working Age Individuals," *Journal of Social Policy* (2021), <https://doi.org/10.1017/S0047279421000878>.

<sup>46</sup> Craig W. M. Scott et al., "Disability Considerations for Measuring Poverty in Canada Using the Market Basket Measure," *Social Indicators Research* 163, no. 1 (2022), <https://doi.org/10.1007/s11205-022-02900-1>.

<sup>47</sup> We would argue that the legislation should have instead used the phrase *economic security*. Economic security depends on three conditions: financial security, financial stability, and financial continuity. Financial security is the ability of a person or household to secure a *basic quality of life*. Financial stability is the ability of households to *weather unexpected income shocks*, such as unexpected expenses or declines in income. Financial continuity is a *reasonable expectation* that a base level of income will continue in both the near term and the future. Economic security is, therefore, more expansive a concept than financial security. While the latter is more concerned about income and assets alone, the former though acknowledges that publicly provided services are an important element in addition to income and assets. This is a particularly salient point as the CDB should be designed and implemented to work cohesively within a system that provides valuable public services to people with disabilities and not consider cash-transfers as a substitute for public services. See Anna Cameron and Lindsay M. Tedds, *Gender-Based Violence, Economic Security, and the Potential of Basic Income: A Discussion Paper*, Report commissioned by Women's Shelters Canada (2021), [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3837386](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3837386).)

benchmarks, such as the Market Basket Measure, or through some other measure that accounts for additional costs incurred by persons with disabilities? How often and using what method should the amount of the CDB be updated to reflect changes in the composition of essential living costs (e.g., a basket of goods and services), changes to the market prices of goods and services (e.g., indexation), and geographic variation in these costs?

- 2) *Universality*: This parameter is related to who would receive the benefit. What portion of the working-age adult population with disabilities would the new benefit cover? Must one be a citizen, a resident, or tax-filer to receive the benefit? Does the program target specific groups by income level or by the nature of disability? As outlined in the United Nations' *Convention of the Rights of Persons with Disability* (CRPD) and as shown through the assessment of current disability support programs, defining disability is a complex and evolving matter and includes not just impairments, but also the interaction of these impairments with environmental barriers along with perceptions of disability. A further complication is how to interpret the phrase 'working-age' used in the legislation, which can include or exclude those aged 15-17, some of whom are independent adults, and sometimes also those aged 18-24. Related, how do we define the end point of working-age and ensure that there is a seamless transition onto senior benefits that also account for the presence of a disability. The degree of universality links back to the principles of dignity and inclusion: the more everyone or everyone in a group is a beneficiary, the greater the potential for reducing stigma related to benefit receipt.
- 3) *Benefit Unit*: This parameter refers to the way the benefit defines individuals or groups as sharing in one benefit. Is the benefit to be paid, like Employment Insurance, to individuals who must establish their own personal eligibility? Or is the benefit to be paid instead to a family that is presumed to share financial and other resources? If the latter, how will a family be defined? Depending on underlying assumptions about what constitutes a family and what happens within a family on financial decisions and distribution of resources, decisions here might be compatible with one but perhaps not both aims the government has set out in its legislation. This is because the objective of financial security implies that the person with disability has control over sufficient income and assets to sustain a basic quality of life. Yet, there is nothing within existing programs that ensures that such control exists or can even be monitored by the state.
- 4) *Equivalence scale*: If the benefit is targeted to the family, should it be scaled such that it is proportional to the cost of meeting family needs, which are generally less than the costs faced by independent individuals? A common equivalence scale is a square root equivalence scale.<sup>48</sup> Should there be adjustments to the benefit amount depending on the

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<sup>48</sup> Factors commonly taken into account through equivalence scales are the size of the household and the age of its members. A typical method is to use a square root equivalence scale, which takes the per capita benefit, multiplies it by the number of beneficiaries in the household, and then divides it by the root of the number of beneficiaries (OECD, "What are Equivalence Scales?", n.d., <http://www.oecd.org/els/soc/OECD-Note-EquivalenceScales.pdf>.) For example, if the individual benefit is \$1,000 per month, then the monthly benefit for a household composed of two people is \$1,414. Many basic income proposals in Canada are designed to base the benefit on the number of adults between the ages of 18 and 64 living in the household, leaving children to be covered by existing programs such as the Canada Child Benefit and seniors to be covered by various pension-style programs. While it may seem

number of persons in the family who have a disability? Again, choices here are fraught with assumptions about the family, how resources are shared and allocated within it, how costs are managed, whose preferences and needs matter, and the valuations of independence while still being part of a family unit. These assumptions need to be challenged through an intersectional (GBA+) lens.

- 5) *Uniformity*: To what degree do beneficiary units with similar income levels and household compositions receive similar benefit levels, and what happens if they have differing forms of disabilities or barriers to full economic and social inclusion? The challenge here is that any degree of heterogeneity in the benefit, which might be introduced to make the benefit fairer or more effective in reducing poverty and achieving financial security, requires that the condition that drives the heterogeneity be adjudicated. This brings in both stigma and complexity, particularly if the condition to be adjudicated is disability. Instead, should the benefit level be set without regard to form or severity of disability, varying only by availability of other income? This still leaves the challenge of defining what other income ought to be included or excluded. Furthermore, use of income-testing alone could mean that the CDB will be less responsive to individual differences in the added costs that persons with disabilities face in their day-to-day lives.
- 6) *Conditionality*: Related to the question of uniformity, is eligibility for or the amount of the benefit conditional on meeting other technical criteria, like income or assets? Will CDB receipt be conditional on receiving an existing disability benefit, such as the Disability Tax Credit? Will there be behavioral conditions such as filing an annual tax return or work search requirements and is the behavioural expectation set with understanding of the lives of people with disabilities? Any degree of conditionality means that the condition needs to be defined and monitored, which adds complexity and stigma.
- 7) *Duration*: For how long can a beneficiary receive the CDB? Is the benefit seen as permanent or as a benefit paid for a specific amount of time to support a person through unexpected shocks that interrupt other sources of income or are aligned with an understanding of the variability of disabilities? Is it intended for a particular life stage or transition, such as leaving a parental household, family dissolution, or disability onset. Conversely, should the CDB serve as a long-term or nearly permanent benefit during adult-life until individuals can qualify for quasi-universal seniors benefits? While many disabilities impose permanent limitations, others are more variable and some, if properly treated, can be eventually mitigated. This leaves the potential for a system that regularly assesses the severity of the disability as eligibility for the CDB, which means not only increased monitoring and surveillance, but also requires adjudication which leads to uncertainty for persons with disabilities.

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that a choice of equivalence scales is a minor technical detail, the choice is based on assumptions about the economics of scale in consumption and on value judgements about the priority assigned to the needs of different individuals. In particular, in societies where it is common to have multigenerational households, care needs to be taken to ensure that these assumptions and judgements are applied appropriately. In particular, when dealing with multigenerational households, it may not be appropriate to assign a lower weight to additional adults, especially elders.

8) *Frequency*: How frequently will the CDB benefit be paid? Will the benefit be delivered annually or sub-annually (e.g., monthly or quarterly), allocated as a one-time, lump sum amount even if paid out at intervals (like some forms of annuities and pensions), or will it be administered through a mixed approach (e.g., a lump sum payment plus a regular stream of payments) that may be used in veterans' disability benefits?<sup>49</sup> To meet the aim of enhancing personal financial security, both lump sum and high-frequency payments might be argued to be relevant depending on whether financial security is defined in terms of income flows alone or includes pools of financial capital as well.

These eight parameters must be defined in order to implement the CDB, yet as we outline above, in practice, setting the conditions under these eight parameters is not remotely simple and may be fraught with unpalatable trade-offs. For example, a benefit that is sufficient to reduce poverty and improve financial security could also be universal to all eligible persons, but only at significantly higher cost.<sup>50</sup> Likewise universality which aims to expand coverage is at odds with conditionality, which aims to restrict access to those who comply. This is also separate and apart from the difficult but critical questions of how eligible persons with disabilities will be identified and treated through program administration. While, as stated above, the legislation does not set any of these parameters, we next consider whether we can infer choices regarding these parameters from the legislation.

### **What existing design choices can we infer from the government legislation?**

Reading the government legislation and its repeated use of the phrase “in the regulations”, one might conclude that there is nothing of substance about the intended design of the benefit, according to the framework outlined above, that could be gleaned from the legislation. We are not convinced this is so. In fact, the legislation contains several sections that appear to belie assumptions made by its drafters. We describe these below, using the organizing framework we have outlined. Where the legislation appears to be silent on a key element of our framework, we likewise refrain from speculation.

*Parameters 2 and 6: Universality and Conditionality:* The government's legislation establishes a clear intent to set certain eligibility criteria in the regulations to follow (s. 4).<sup>51</sup> The legislation also allows the government to compel applicants to provide certain forms of information to determine eligibility and authorizes the Governor in Council to make regulations on “conditions that are to be met in order to receive or to continue to receive a benefit”<sup>52</sup> This would imply a benefit that may not be truly universal in covering all persons with disabilities, and that some conditions (as yet to be determined) will apply to eligibility.

Benefits that have poverty-reduction objectives, including but not limited to social assistance and proposals for basic income, will frequently impose some form of participation condition. For example, all provincial social assistance programs in Canada classify applicants according to

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<sup>49</sup> Canada, "Disability Benefits—Veterans Affairs Canada," 2019, accessed March 30, 2023, <https://www.veterans.gc.ca/eng/financial-support/compensation-illness-injury/disability-benefits>.

<sup>50</sup> Green, Kesselman and Tedds. *Supra* at note 17.

<sup>51</sup> Canada, *Supra* note 2, s.4

<sup>52</sup> Ibid, s.11(1)(b).

whether the expectation to be actively seeking employment applies or can be suspended in their case.<sup>53</sup> Likewise, the Canada Child Benefit and Canada Workers Benefit explicitly require that an income tax return be filed by both the recipient and, if applicable, their spouse or common-law partner.<sup>54</sup> The quasi-universal Old Age Security (OAS), including the poverty-reducing Guaranteed Income Supplement (GIS), impose a minimum residency test and, in the case of the GIS, require annual income tax returns for benefits to continue to be paid.<sup>55</sup>

In the case of the CDB, a participation requirement seems clearly inappropriate. The CDB is a benefit created in recognition of the inability of many persons with disabilities to engage in paid work activities consistently (or at all), and in recognition of the exclusion persons with disabilities too often experience in the labour market.

That the legislation also provides for the responsible Minister to collect and make use of personal Social Insurance Numbers (SIN)<sup>56</sup> and to “enter into agreements with any department or agency of the Government of Canada and [...] with any department or agency of a province”<sup>57</sup> suggests that the drafters anticipated the need to provide legal authority for access to personal income tax data and to other federal and provincial program information where a SIN will be important to enable records linkage. This administrative capacity makes sense if the benefit is to be conditional on income (perhaps as determined on annual personal income tax returns).<sup>58</sup> Since the legislation sets out the twin aims of poverty-reduction and financial security for persons with disabilities, we might expect that persons with disabilities who are deemed to be already financially secure and not in poverty will not be eligible for the benefit. But this suggestion of an income test in the legislation does nothing to address the difficult questions of whose income, from what sources, and if any exemption threshold are under consideration.

The administrative capacity to access other federal and provincial information likewise suggests that officials designing and implementing the CDB may need to know which other disability programs an applicant is already participating in. As we outlined above, at the federal level alone, there are several programs targeted to persons with temporary or permanent disabilities and each has their own definitions of eligibility, including when and how a disability might be recognized. Further disability supports through provincial social assistance programs equally vary in whether they define disabilities and if they do what definition is used. There is, as yet in Canada, no universally accepted single mechanism to establish long-term disability for federal, provincial, or private sector benefit administrators. While the CDB has been described by the federal government as a GIS-like top-up for adults with disabilities (suggesting an income-tested supplement to improve total income sufficiency), for working-age adults with disabilities, there is no quasi-universal OAS equivalent. Instead, several federal and provincial programs might

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<sup>53</sup> Anne Tweddle and Hannah Aldridge, *Welfare in Canada, 2018*, Maytree (2019), [https://maytree.com/wp-content/uploads/Welfare\\_in\\_Canada\\_2018.pdf](https://maytree.com/wp-content/uploads/Welfare_in_Canada_2018.pdf).

<sup>54</sup> See *Income Tax Act*, Subdivision A.1 (Canada Child Benefit), s.122.6, and Subdivision A.2 (Canada Workers Benefit), s.122.7.

<sup>55</sup> Canada, "Guaranteed Income Supplement – Overview [Service initiation]," 2015, accessed November 20, 2022, <https://www.canada.ca/en/services/benefits/publicpensions/cpp/old-age-security/guaranteed-income-supplement.html>.

<sup>56</sup> Canada, *Supra* note 2, s.7

<sup>57</sup> *Ibid*, s.8.

<sup>58</sup> In fact, the government’s legislation for the CDB amends the *Income Tax Act* explicitly to enable the CRA to disclose taxpayer information for the purpose of enforcing any part of the *Canada Disability Act* (see s.13).

separately be used as proxies to meet the condition of having a disability. As yet, only one of these is recorded in annual personal income tax returns, the DTC, a point we return to later.<sup>59</sup>

*Parameter 3: Benefit Unit:* As described in our framework above, a key consideration in benefit design is the definition of the benefit unit. In this case, the legislation,<sup>60</sup> refers to “a person” being eligible if they meet the criteria to be defined later in the regulations. This establishes the individual person with a disability as the recipient of the benefit, in keeping with the policy aim of promoting financial security for persons with disabilities. This suggests that benefit payments will be issued to the individual and will be presumed to be in their personal control, unless the payment is being issued to another person on their behalf, as is permitted at s.5 of the legislation. This recognizes that some persons with disabilities may require caregiver assistance to complete and comply with benefit applications and, for reasons of impairment (temporary or permanent), may have explicitly assigned control over their financial affairs to a trusted individual. This is consistent with, for example, the rules regarding the RDSP.<sup>61</sup>

However, it does not automatically follow that only individual characteristics (such as income) will be considered in determining eligibility. Existing federal benefits that have a poverty-reduction aim, including the Canada Child Benefit (CCB) and the Canada Workers Benefit (CWB), make payments to individual persons but use a concept of income in establishing eligibility that includes the applicant and a cohabiting married or common-law spouse.<sup>62</sup> Furthermore, in those benefits, only one benefit can be paid to a family, effectively establishing the family as the benefit unit. This is on the assumption that the benefit will be shared among family members for their shared living expenses. The potential effects on financial independence and earnings incentives for secondary earners have been discussed elsewhere.<sup>63</sup>

When income poverty thresholds are defined using units of analysis that align with this family-as-benefit-unit approach, policymakers are able to measure the effects of their intervention on observed poverty levels. As we discuss later in this paper, the fact that standard poverty measures will underestimate basic costs associated with disability, and that the legislation sets an aim of financial security for individual persons, means the family as benefit unit approach familiar in the CCB and CWB are ill-suited to the CDB.

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<sup>59</sup> While benefits received from provincial disabilities programs are reported on the T5007 and included on an individual’s tax form, the T5007 form, as it currently exists, does not distinguish between disability benefits and other social assistance benefits. This means this information cannot currently be used to determine eligibility for a disability benefit. While the form could be modified to include this information, it is important to note that not all provincial social assistance programs include a targeted benefit to persons with disabilities. This is particularly poignant for persons with disabilities living in Nunavut, a territory where it is also difficult to obtain the medical services needed to be diagnosed with a medical condition that could be considered as a disability.

<sup>60</sup> Canada, *Supra* note 2, s.4

<sup>61</sup> Canada, "Opening an RDSP [Service description]," 2008, accessed November 18, 2022, <https://www.canada.ca/en/revenue-agency/services/tax/individuals/topics/registered-disability-savings-plan-rdsp/opening-rdsp.html>.

<sup>62</sup> See *Income Tax Act*, Subdivision A.1 (Canada Child Benefit), s.122.6, and Subdivision A.2 (Canada Workers Benefit), s.122.7.

<sup>63</sup> Tammy Schirle, *Supporting women as they enter and re-enter the workforce. Notes prepared for a discussion with Ontario's Task Force on Women and the Economy* (2021), <https://tammyschirle.org/wp-content/uploads/2021/07/Schirle-Ontario-taskforce-july29-2021.pdf>.

*Parameters 7 and 8: Duration and Frequency:* The government's legislation provides some, but limited, clues on the potential features of duration and frequency. The legislation references the authority (and therefore implies the need) to make regulations regarding indexation<sup>64</sup> and the "payment periods and amount to be paid each period".<sup>65</sup> This suggests a benefit that will be paid at some regular intervals (perhaps monthly, quarterly or annually) and where beneficiaries may be expected to be in receipt over periods of time in which indexation can make a material difference to the real value of the benefit they are paid. This would be consistent with the aim of promoting personal financial security and reducing poverty where both of these are conceived of and measured in terms of income flows alone. We should not expect the CDB to feature large lump-sum single payments or annuity-style payments determined at a fixed point in time. But this does little to answer the question of how many years CDB recipients might be expected to collect benefits and how frequently, within those years, they might be able to count on a transfer of income.

Further, we note that the Minister's speech in tabling the bill made reference to the relief provided by gaining eligibility for OAS suggests that the CDB is planned as a benefit that will be long-term but will end when a recipient becomes eligible for OAS instead.<sup>66</sup> On the one hand, this suggests an upper age limit for CDB eligibility so that the phase out of the CDB coincides with OAS/GIS eligibility at age 65.<sup>67</sup> That would be consistent with a benefit aimed at working-age adults with disabilities, so long as age 65 remains an accepted short-hand for a normal age of retirement and a recognition that many seniors experience age-related forms of impairment and disability. But what is the lower-bound of any age-related start on the duration of CDB eligibility? Here the legislation is silent except in its reference to working-age. But how should that be defined and, more importantly, how should that be defined as it applies to persons with disabilities? In some cases, the disability is the result of a congenital condition and limitations on their activity and health are present from a very young age. In other cases, the disability condition may be long-term but unpredictable in its course, sometimes relapsing or remitting. For adults who acquire a disability while working, short and longer-term income support programs exist with varying degrees of accessibility and generosity. Should those working-age adults with an acquired but temporary disability (such as workplace injury) become eligible for the CDB for as long as they remain unable to resume their prior level of paid work activity? Or is the CDB instead intended to serve as a long-term income support for those Canadians with chronic and debilitating conditions that put them at risk of long-term and poverty?

A group that is particularly vulnerable to the lower-bound age definition are youth in and aging out of care. Most provincial/territorial jurisdictions require that youth-in-care exit the program before the age of 18 and some allow youth-in-care to become dependent as young 15. As youth in care are much more likely to be Indigenous, application of an intersectional lens to setting the lower-bound age for eligibility will be essential.

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<sup>64</sup> Canada, *Supra* note 2, s.11(1)(d)

<sup>65</sup> Ibid, s.11(1)(e).

<sup>66</sup> Canada, *Supra* note 3, at 7392 (Qualtrough).

<sup>67</sup> Here we note that eligibility for full OAS payments for persons living in Canada depend on citizenship or permanent residence and a minimum of 10 years residency in Canada since the age of 18. Reduced benefits may be paid for newcomers with less than the 10 years of permanent residence in the country.

While the legislation provides some information related to how some of the eight parameters might be determined for the CDB, in no case does the legislation provide clear guidance. Instead, what we outline here are key policy questions that should be top-of-mind when setting the conditions for several parameters, noting the deep complexity of the process of designing and implementing the benefit. Further, some parameters are not even mentioned at all in the legislation. As a result, we now turn to looking at how lessons from COVID benefit may aid in providing more information related to the parameter elements.

### **Applying our Framework to the Design of the Canada Disability Benefit with Lessons from COVID benefits.**

*Parameters 3 and 4: Benefit Unit and Equivalence Scale:* For the proposed CDB, a family benefit unit, whether explicit in setting benefit amounts according to household composition, or implicitly by using family income as a condition, would not fulfill the CDB's legislative objective of promoting financial security for persons with disabilities. We see a tension between the legislated aims of poverty reduction and personal financial security as it pertains to the benefit unit. Poverty reduction is more often associated with a family benefit unit, recognizing that the dependents of an applicant in poverty are also themselves in poverty and in need of support to meet basic needs. The policy objective is to bring a benefit unit at least up to or above the relevant poverty line, measured at the family level.<sup>68</sup> But the logic of personal financial security is more clearly associated with individualization. When Canadians are unable to find financial security through paid work, whether due to job loss, illness, injury, caregiving or old age, Canada's welfare state responds with individual income replacement in the form of Employment Insurance, workers compensation and public pensions, each of them an individualized benefit. This was also true of the myriad income transfers set up during the first waves of the COVID-19 pandemic.<sup>69</sup> An individual benefit is also more consistent with other existing federal tax and transfer programs that reach persons with disabilities, such as veteran's benefits, Employment Insurance sickness benefits, Canada Pension Plan disability benefits, and the Disability Tax Credit.<sup>70</sup> If the proposed CDB is meant to serve as a top-up to these and other existing programs, integration of the new benefit is likely to be smoother when benefit units align.<sup>71</sup>

Finally, the individual and personal experience of disability is just that, individual and personal. It is individuals who face varying forms of exclusion and limitations to their ability to meet their needs by earning work income. This may be because of health or activity limitations that are part

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<sup>68</sup> For more information on Canada's official poverty measure, readers may wish to consult Statistics Canada's "Dimensions of Poverty Hub", accessed March 31, 2023, <https://www.statcan.gc.ca/en/topics-start/poverty>.

<sup>69</sup> The one exception was the Canada Recovery Caregiving Benefit which permitted only one member of a family benefit unit to claim the benefit at a time, on the assumption that two adults would not be simultaneously required to reduce or stop working to provide care to one or more dependent children. The merits of this assumption are open to some debate, especially with regards to parents with dependent children with severe disabilities.

<sup>70</sup> One notable exception are the federal transfers and savings incentives for Registered Disability Savings Plans which are conditioned on family income, making them more like a family-level benefit program. However, the intent of that program is to encourage long-term savings, particularly among parents of children with disabilities, where the beneficiary of the saving will be a person with a disability but the target for the behavioral incentive of the policy is the family unit.

<sup>71</sup> Here we note that provincial programs for persons with disabilities delivered through social assistance do use family as the benefit unit.

and parcel of their disability, but also because of systematic discrimination in workplaces and the failure of labour markets more generally to accommodate and adequately value the labour of many working-age adults with disabilities.<sup>72</sup> Family members who provide unpaid care and informal support to a loved one with a disability may experience significant work-family strain or even out-of-pocket expenses associated with care,<sup>73</sup> but compensating those caregivers is not part of the stated policy aims for the CDB, according to the government's legislation.

Recognizing that families may form, dissolve, and reform over the course of a lifetime, and recognizing that the added costs of disability follow individual persons with disabilities, the CDB should not aim to bring other family members into the benefit unit, whether directly or indirectly through family income testing.

There is also an important gendered dimension to this question of benefit unit. As we noted earlier, by best estimates, there are approximately 3.7 million Canadians aged 25 to 64, who have a disability.<sup>74</sup> Among these Canadians, women are over-represented at 55% of working age adults with disabilities.<sup>75</sup> While persons with disabilities are more likely to live alone relative to Canadians without a disability, 59.5% live with a spouse or partner.<sup>76</sup> Within the household, and particularly for women with disabilities, there may not be a guarantee that income resources gained because of disability status will necessarily be spent by the household to meet the needs of the person with a disability. When a non-disabled spouse's income is taken into account in calculating the benefit payable, policymakers assume that the reduction in the benefit reflects the share of spousal income that should be going to provide support to the spouse with a disability. But this may be a strong and flawed assumption. The literature on gender dynamics and power differentials in intra-household bargaining and financial decision-making is clear for the general population, with men exercising greater control over major financial decisions in heterosexual couples.<sup>77</sup> We have no reasons to suspect that women with disabilities would exercise greater control or bargaining power over financial decisions, relative to other women. While it is the person with the disability who personally incurs the penalty to their ability to earn income, they

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<sup>72</sup> Michelle Maroto and David Pettinicchio, "Disability, Structural Inequality, and Work: The Influence of Occupational Segregation on Earnings for People with Different Disabilities," *Research in Social Stratification and Mobility* 38 (2014), <https://doi.org/http://dx.doi.org/10.1016/j.rssm.2014.08.002>.

<sup>73</sup> Martin Turcotte, Family caregiving: What are the consequences? , 75-006-X (2013), <https://www150.statcan.gc.ca/n1/pub/75-006-x/2013001/article/11858-eng.htm>.

<sup>74</sup> Morris et al. *Supra* note 14.

<sup>75</sup> This is true under either a definition of working age of 15-64, consistent with national practice in the Labour Force Survey, or age 25-64 to reduce the representation of students.

<sup>76</sup> Statistics Canada, "Housing Experiences in Canada: Persons with Disabilities," 2022, accessed December 8, 2022, <https://www150.statcan.gc.ca/n1/pub/46-28-0001/2021001/article/00011-eng.htm>.

<sup>77</sup> Zhiqi Chen and Frances Woolley, "A Cournot-Nash Model of Family Decision Making," *The Economic Journal (London)* 111, no. 474 (2001), <https://doi.org/10.1111/1468-0297.00657>; Marie Drolet, "Gender differences in the financial knowledge of Canadians," *Insights on Canadian Society*, Statistics Canada, 2016, Statistics Canada. <https://www.statcan.gc.ca/pub/75-006-x/2016001/article/14464-eng.htm>; Shek-Wai Hui, Carole Vincent, and Frances Woolley, "Understanding Gender Differences in Retirement Saving Decisions: Evidence from the Canadian Financial Capability Survey (CFCs)" (Canadian Economics Association Annual Meeting, Ottawa, 2011); Jennifer Robson and Johanna Peetz, "Gender differences in financial knowledge, attitudes, and behaviors: Accounting for socioeconomic disparities and psychological traits," *The Journal of Consumer Affairs* 54, no. 3 (2020), <https://doi.org/10.1111/joca.12304>; Eva M. Sierminski, Joachim R. Frick, and Markus M. Grabka, "Examining the gender wealth gap," *Oxford Economic Papers* 62, no. 4 (2010), <https://doi.org/10.1093/oep/gpq007>; Kar-Ming Yu et al., "Gender Differences in Financial Literacy Among Hong Kong Workers," *Educational Gerontology* 41, no. 4 (2015), <https://doi.org/10.1080/03601277.2014.966548>.

may not be able to exercise full control over the use of a disability payment that is made to the family as a whole or made on the basis of family income and its attendant assumptions of within-household redistribution.

With regard to the question of equivalence scales, when the benefit unit is equivalent to 1, the question of how to adjust for family composition is largely moot.

*Parameters 1 and 2: Sufficiency and Uniformity:* We do not pretend that this paper will be able to settle the question of what level of payment would meet the criterion of sufficiency. We do note that the government has, again, set two separate policy aims in its legislation: poverty reduction and individual financial security. These are not mutually exclusive if the final form of the CDB is a benefit that does not phase out to \$0 as soon as poverty threshold is reached. But we note, again, that national thresholds for poverty established for the general population will not adequately address material deprivation for many persons with disabilities who face additional costs to enjoy a comparable level of well-being to other Canadians.<sup>78</sup> There is considerable work to be done to document and understand the added costs of disability and, in discussion with the disability community, to determine the appropriate balance between income support to meet those costs and the public provision (or subsidization) of key goods and services that reduce the effective costs and enhance inclusion for persons with disabilities.

It is clear, that if an increase in income support leads to a reduction or withdrawal of publicly-funded (or publicly-provided) goods and services, then the test of sufficiency will have been failed. A uniform disability benefit is unlikely to be compatible, in practice, with a benefit that is sufficient to improve well-being for all recipients. We are informed by the example of the COVID-19 income supports for working-age adults. The chief benefit was the Canada Emergency Response Benefit (CERB), a flat and taxable benefit of \$2,000 per month so long as past work income was at least \$5,000.<sup>79</sup> Initially, CERB presumed that no other income could be earned through paid work after the first benefit period. This was later revised to permit self-declarations of up to \$1,000 in work earnings without interrupting benefit payment. Some observers at the time hailed the program as an example for basic income and the future of income support in Canada.<sup>80</sup> The COVID-19 benefit was simple to administer and had an appearance of horizontal equity, but it likely overpaid some and underpaid others, relative to their past work income and other income sources. Moreover, the net value, after taxes and transfers, of CERB will have differed considerably from one recipient to another. As a short-lived and intentionally temporary and simplified benefit, the risks of over- and under-compensation were moderate. But for a new statutory and ongoing benefit, a uniform benefit structure is incompatible with the principle of sufficiency if the aims are to reduce poverty and enhance financial security.

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<sup>78</sup> Scott et al., *Supra* note 46.

<sup>79</sup> Jennifer Robson, "Radical Incrementalism and Trust in the Citizen: Income Security in Canada in the Time of COVID-19," *Canadian Public Policy* 46, no. S1 (2020), <https://doi.org/10.3138/cpp.2020-080>.

<sup>80</sup> Evelyn Forget, "A Guaranteed Minimum Income Would be More Effective than Current Government Programs," *Policy Options*, November, 2020, <https://policyoptions.irpp.org/magazines/november-2020/a-guaranteed-minimum-income-would-be-more-effective-than-current-government-programs/>; Hugh Segal, Keith Banting, and Evelyn Forget, "The need for a federal Basic Income feature within any coherent post-COVID-19 economic recovery plan," *Facets (Ottawa)* 6, no. 1 (2021), <https://doi.org/10.1139/facets-2021-0015>; UBI Works, "Turn CERB into Universal Basic Income—Sign the Petition for Recovery UBI," 2021, <https://www.ubiworks.ca/cerb-to-basicincome>.

*Parameters 7 and 8: Duration and Frequency:* As a statutory benefit, the CDB will be payable to eligible persons for as long as they remain eligible. This could be a period of many years or indeed, several decades. Given past practice in income support systems in Canada, it would be unusual for the benefit receipt to be capped at a cumulative dollar amount or at a cumulative duration of time, as has been the case in many state-level rules in American welfare programs.<sup>81</sup> But even with a recognition that this benefit could form a permanent income for many adults with disabilities, policymakers will need to determine whether and how often eligibility must be re-established. This may include requirements to provide information on other sources and amounts of income, which we explore in greater detail, below, in our discussion of conditionality. Existing federal and provincial income support programs require annual or more frequent verification of income eligibility, effectively reducing the guaranteed duration of benefits to 12 months or less.<sup>82</sup> Where the policy aims are to promote benefit exit, more frequent verification and shorter effective duration periods are more common.

In the case of the CDB, how often should benefit recipients be required to re-establish that they are a person with a disability? Current federal benefits are of limited help in identifying best practices. The Disability Tax Credit (DTC) requires that eligible persons obtain a certificate completed by an eligible medical practitioner to verify that they meet the criterion of having a severe and prolonged impairment. If accepted by the Canada Revenue Agency, the medical certificate may not need to be replaced, may be valid for some defined number of years, or may be subject to a review by the Agency, a degree of uncertainty that others have noted places undue strain on persons with a disability in Canada.<sup>83</sup> The Canada Pension Plan disability benefits are likewise subject to file reviews “from time to time”, according to Employment and Social Development Canada.<sup>84</sup> These periodic and unpredictable reviews are intended to ensure the integrity of program delivery. That is, ensuring that only eligible persons are in receipt of benefits and that they are only receiving the amounts to which they are entitled. In the case of the Canada Pension Plan, best estimates suggest that integrity measures resulted in recovery of overpayments equivalent to 0.0003% of all benefits (pension and disability amounts) in the program.<sup>85</sup> In short, the costs and benefits to both beneficiaries and governments should be

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<sup>81</sup> Mary Farrell et al., *Welfare Time Limits: An Update on State Policies, Implementation, and Effects on Families*, MDRC (2008), <https://www.mdrc.org/publication/update-state-welfare-time-limit-policies-and-their-effects-families>.

<sup>82</sup> The Canada Workers Benefit and Canada Child Benefit rely on annual verification of eligibility through tax-filing, with an option to voluntarily provide information on important changes of circumstance within the benefit year. Employment Insurance regular benefits are payable for a set duration of time per claim, according to local unemployment conditions and past program use, but continued payment of benefits is contingent on bi-weekly reporting. Likewise, provincial social assistance programs require monthly reporting by recipients for benefits to continue to be paid.

<sup>83</sup> André Picard, "Opinion: The CRA makes life more difficult for people with disabilities," *The Globe and Mail*, July 2 2018, <https://www.theglobeandmail.com/opinion/article-the-cra-makes-life-more-difficult-for-people-with-disabilities/>.

<sup>84</sup> Canada, "Guaranteed Income Supplement – Overview [Service initiation]," 2015, accessed November 20, 2022, <https://www.canada.ca/en/services/benefits/publicpensions/cpp/old-age-security/guaranteed-income-supplement.html>.

<sup>85</sup> Canada, Annual report of the Canada Pension Plan for fiscal year 2019 to 2020 [Report on plans and priorities], (2022), [https://www.canada.ca/content/dam/esdc-edsc/documents/programs/pensions/reports/annual-2020/2019-2020\\_CPP\\_Annual%20Report-ANNEX%20A-EN-20220613-Final-Minister\\_Seniors\\_Signed.pdf](https://www.canada.ca/content/dam/esdc-edsc/documents/programs/pensions/reports/annual-2020/2019-2020_CPP_Annual%20Report-ANNEX%20A-EN-20220613-Final-Minister_Seniors_Signed.pdf). ESDC reports \$48.9 billion in CPP benefits paid annually and \$13.5 million in benefits overpayment recovered via integrity measures.

considered when determining how long a claim of disability will be recognized for the purposes of the CDB and how often claimants might be asked to re-establish their eligibility.

As described earlier, the government's framework legislation for the CDB suggests a benefit design of recurring payments. This would be consistent with its aims of promoting financial security and reducing poverty by establishing a new flow of income. However, the needs and preferences of persons with disabilities may vary. Current income benefits for working-age adults are variously paid bi-weekly (e.g., EI), monthly (e.g., CPP-D, CCB, and provincial income assistance), quarterly (e.g., GST/HST credit) and annually (e.g., CWB). Evidence from the United States suggests that some low-income adults prefer to delay receipt of income support so that it arrives in a lump sum to cover one-time expenses,<sup>86</sup> although other research suggests that inertia and administrative burden, rather than true preference may be the primary drivers of behavior.<sup>87</sup> For Canada, the CDB may represent an opportunity for a truly modern approach to benefit design and delivery that places the user at the centre, rather than the needs and preferences of the administrative state.<sup>88</sup> In the case of benefit frequency, this could take the form of individual choice and agency over the frequency with which payments are issued.

*Parameters 2 and 6: Universality and Conditionality:* We end this application of our benefit design framework to the CDB with a discussion of the questions of universality and conditionality. Here we are principally concerned with two possibilities for the implementation of the new benefit, informed by past policy practice in Canada, particularly in COVID benefits.

If the CDB aims to be a universal or at least quasi-universal benefit for working-age adults with disabilities, then attention to the effects of layering on such a benefit, given existing variations in access to and benefits from other social programs merits strong attention by policymakers. Current public programs for working-age adults in low-income, and the subset of adults already on provincial disability income support (where available), are a complex web that blends cash transfers with in-kind supports of goods and services.<sup>89</sup> There is no simple way, that we are aware of, to avoid all unintended program interactions. Whether the benefit is paid as a taxable source of income or as an after-tax transfer, myriad programs will have their own rules and regulations regarding the classification and consequences of this form of income. But this complexity should not be cause for complacency either or an acceptance that a thinly-universal benefit could result in very uneven outcomes for recipients.

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<sup>86</sup> Younghie Lim, Michelle Livermore, and Belinda Creel Davis, "Tax Filing and Other Financial Behaviors of EITC-Eligible Households: Differences of Banked and Unbanked," *Financial Counseling and Planning* 22, no. 2 (2011); David Neumark and William Wascher, "Using The EITC to Help Poor Families: New Evidence and a Comparison with the Minimum Wage," *National Tax Journal* 54, no. 2 (2001), <https://doi.org/10.17310/ntj.2001.2.05>.

<sup>87</sup> Saurabh Bhargava and Dayanand Manoli, "Psychological Frictions and the Incomplete Take-Up of Social Benefits: Evidence from an IRS Field Experiment," *The American Economic Review* 105, no. 11 (2015), <https://doi.org/10.1257/aer.20121493>; Damon Jones, "Inertia and Overwithholding: Explaining the Prevalence of Income Tax Refunds," *American Economic Journal. Economic Policy* 4, no. 1 (2012), <https://doi.org/10.1257/pol.4.1.158>.

<sup>88</sup> Jennifer Robson, "Radical Incrementalism and Trust in the Citizen: Income Security in Canada in the Time of COVID-19," *Canadian Public Policy* 46, no. S1 (2020), <https://doi.org/10.3138/cpp.2020-080>.

<sup>89</sup> Gillian Petit and Lindsay M. Tedds, "Income and Social Support Programs in B.C. and B.C. General and Health Supplements (data visualizations)," (2019). <https://bcbasicincomepanel.ca/charts>.

We note, for example, during the delivery of the COVID-19 benefits that the Minister of Employment and Workforce Development publicly communicated a hope that provinces and territories would not reduce provincial social assistance for those on benefits who also received CERB (Monsebraaten, 2020). But without a formal intergovernmental agreement, likely impossible to reach in the height of the crisis, only one province and two territories voluntarily complied with this federal request. The interprovincial variation in the net change to beneficiary incomes was striking.<sup>90</sup> For many CERB recipients, provincial income benefits were reduced to \$0, while for others (depending on jurisdiction and the type of provincial benefit received), total incomes rose significantly if only temporarily. These provincial benefits are a frequent and important source of income (and access to in-kind goods and services) to many adults with disabilities. To achieve their own policy objectives, federal policymakers must reach formal agreements with provinces and territories on equitable treatment of the CDB in provincial income support and in-kind benefits.

As we note in our earlier discussion, universal designs are intended to reduce stigma and ensure the dignity of those participating in the program. This has likewise been part of the argument in favour of structuring income support programs as refundable credits that are administered through the personal income tax system.<sup>91</sup> In systems with partial voluntary reporting and self-assessed returns, such as Canada and the U.S., the requirement to file a return to receive these benefits becomes a condition of benefit receipt.<sup>92</sup> Tax-filing then becomes an effective condition of benefit eligibility when administrators outside of the tax agency rely on personal income tax assessments to verify income. When benefits are intended to reach low-income and otherwise marginalized groups, there is particular reason to believe that tax-filing as a condition and administration by the tax authority may result in eligible non-participation.<sup>93</sup> For example, Robson and Schwartz<sup>94</sup> find that 19.6% of persons below Canada's poverty line (among whom persons with disabilities are significantly over-represented) did not appear to file a tax return in 2015. In the U.S., observers have noted that low-income recipients may avoid interactions with the tax agency and so forego the Earned Income Tax Credit (an income-tested cash transfer for working-age adults), even after filing a tax return and even when responding to the agency might verify their eligibility for the benefit.<sup>95</sup>

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<sup>90</sup> Gillian Petit and Lindsay M. Tedds, "The Effect of Differences in Treatment of the Canada Emergency Response Benefit across Provincial and Territorial Income Assistance Programs," *Canadian Public Policy* 46, no. S1 (2020), <https://doi.org/10.3138/cpp.2020-054>; Gillian Petit and Lindsay M. Tedds, "COVID-19 & Trends in Income Assistance Caseloads," *The School of Public Policy Publications* 14 (2021), <https://doi.org/https://doi.org/10.11575/sppp.v14i>, <https://www.policyschool.ca/wp-content/uploads/2021/02/FPT-covid-social-assistance.pdf>; Gillian Petit and Lindsay M. Tedds, "Interactions Between Federal and Provincial Cash Transfer Programs: The Effect of the Canada Emergency Response Benefit on Provincial Income Assistance Eligibility and Benefits," in *Managing Canadian Federalism Beyond Pandemic*, ed. Kathy L. Brock and Geoffrey E. Hale (University of Toronto Press, 2023).

<sup>91</sup> Robert Moffitt, "An Economic Model of Welfare Stigma," *The American Economic Review* 73, no. 5 (1983).

<sup>92</sup> Jennifer Robson and Saul Schwartz, "Who Doesn't File a Tax Return? A Portrait of Non-Filers," *Canadian Public Policy* 46, no. 3 (2020).

<sup>93</sup> Eligible non-participation refers to persons who are otherwise eligible but do not take action to receive a government program or benefit and, as a consequence, do not receive the support they are entitled to.

<sup>94</sup> Jennifer Robson and Saul Schwartz, "Who Doesn't File a Tax Return? A Portrait of Non-Filers," *Canadian Public Policy* 46, no. 3 (2020).

<sup>95</sup> National Taxpayer Advocate, "EITC Audits Will Once Again Begin; Proactively Responding to an EITC Audit Is Crucial," *NTA Blog*, March 23, 2022, <https://www.taxpayeradvocate.irs.gov/news/nta-blog-eitc-audits-will-once-again-begin-proactively-responding-to-an-eitc-audit-is-crucial/>.

The costs of establishing and operating an alternate method of income verification, outside the tax system, may be prohibitive. The Employment Insurance program, for example, relies on a separate method of verifying applicants' recent incomes but this, along with other administrative processes, result in a cost of some \$2 billion annually, equivalent to roughly 8% of total program costs.<sup>96</sup> If, as seems likely given its stated policy objectives of poverty reduction and improving financial security, the CDB will be income-tested, then policymakers may continue to rely on federal income tax returns as the primary source of income verification for this purpose. There are, however, opportunities for policymakers to reduce the administrative burden of filing a return to obtain the CDB and other benefits.<sup>97</sup>

An income tax return can also be used as a condition on a benefit to verify another portion of eligibility, outside of personal (or family) income. For example, access to the proposed temporary dental benefit<sup>98</sup> requires not only verification of income but is also conditional on receipt of the CCB, itself a benefit that requires a tax return. The one COVID-19 benefit targeted to persons with disabilities was a \$600 one-time payment to Canadians approved for the DTC.<sup>99</sup> Although it was announced in June 2020, payments were not issued until January 2021 or, many eligible recipients were made to wait until April 2021, nearly a full year later. The DTC has also been used for several years to establish eligibility for the tax-benefitted Registered Education Savings Plan, and associated savings incentives.<sup>100</sup>

However, we do note that the objective of achieving financial security includes some notion of asset resilience. Building asset resilience is tied tightly to condition the benefit on some definition of income. Further, persons with disabilities incur more costs than those without in participating in paid work endeavors. Most provincial and territorial disability support programs have an earnings exemption for persons with disability, with British Columbia being the highest at \$15,000 a year. For the CDB to achieve its objectives, it will need to include some form of an income or earnings exemption and due consideration will need to be given to ensure that the exemption is set appropriately to ensure dignity for persons with disabilities and in accordance with CRPD.

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<sup>96</sup> Authors' calculation using data in Employment Insurance Annual Monitoring and Assessment Report. Canada, Employment Insurance Monitoring and Assessment Report for the fiscal year beginning April 1, 2020 and ending March 31, 2021, (2022), <https://www.canada.ca/en/employment-social-development/programs/ei/ei-list/reports/monitoring2021.html>.

<sup>97</sup> Anna Cameron et al., "Tax Policy Trends: The Merits of Automatic Income Tax Assessments for Low-Income Canadians," *The School of Public Policy Publications* (February 12, 2020), <https://www.policyschool.ca/wp-content/uploads/2020/02/Tax-policy-Trends-Feb-2020.pdf>; Jennifer Robson and Saul Schwartz, "Who Doesn't File a Tax Return? A Portrait of Non-Filers," *Canadian Public Policy* 46, no. 3 (2020).

<sup>98</sup> See Part 1. Dental Benefit Act, s.5(c), Bill C-31, *An Act Respecting Cost of Living Relief Measures Related to Dental Care and Rental Housing*, House of Commons, 44<sup>th</sup> Parliament, 1<sup>st</sup> session.

<sup>99</sup> Canada, News release: Prime Minister announces supports for Canadians with disabilities to address challenges from COVID-19, <https://www.newswire.ca/news-releases/prime-minister-announces-supports-for-canadians-with-disabilities-to-address-challenges-from-covid-19-815801271.html>.

<sup>100</sup> Canada, "Opening an RDSP [Service description]," 2008, accessed November 18, 2022, <https://www.canada.ca/en/revenue-agency/services/tax/individuals/topics/registered-disability-savings-plan-rdsp/opening-rdsp.html>.

The DTC was created in 1944 as a tax deduction for blind persons and was later converted to a non-refundable credit available for other disabilities deemed to be severe and enduring in their impact daily activities. As we discussed earlier in this article, the DTC is an administratively burdensome credit to obtain. While this has prompted the CRA to promise a new navigator service to guide applicants through the DTC application process,<sup>101</sup> a quick internet search reveals a large number of firms promising Canadians with disabilities help, for a fee, to access the credit. We repeat here again for emphasis that at present, while there are 3.7 million Canadians aged 25 to 64 who have a disability,<sup>102</sup> just 492,000 of these Canadians hold a DTC certificate for their own disability.<sup>103</sup> If the DTC is also used as a condition for access to the new CDB, we should expect that an important share of working-age adults with disabilities will be excluded from the program. This would repeat the errors of the COVID-19 benefits and would fail to address the important gaps in Canada's patchwork of support for working-age adults with disabilities.

## Conclusion

The federal government has committed to creating a new income benefit for working-age adults with disabilities. It has the potential to meaningfully improve the well-being and inclusion for these Canadians. As currently drafted, the enabling legislation for the benefit hints at, but does not specify many of the key elements that must be considered in the design of any new cash transfer. The twin policy aims of reducing poverty and enhancing financial security for persons with disabilities likewise suggest a mix of complementary but sometimes conflicting choices in program design. Canada's existing suite of income support programs targeted to those with disabilities along with the most recent experience in benefit design, in the series of COVID-related income supports, serves as a caution that thin universality and efforts to streamline administrative burden can still result in very uneven or inequitable outcomes for benefit users, particularly for persons with disabilities. As discussed earlier, in the case of COVID benefits for persons with disabilities, targeted benefits were slow to be delivered, were conditioned on a tax credit that excludes too many, and, for those in receipt of provincial income assistance left many measurably worse off,

There will be substantial work to detail the design and implementation of the CDB through the regulations authorize by the legislation. And that work must be conducted through an inclusive and intersectional lens to ensure that ableist assumptions are not embedded into benefit design. These assumptions both treat the absence of disability as the default or normal state for persons and treat persons with disabilities as a homogenous group, without regard to the intersections of gender, or the nature and severity of the disability. Hopefully, an inclusive process of design will

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<sup>101</sup> Canada, 2020 Client Experience Report of the Disability Advisory Committee, (2021), <https://www.canada.ca/en/revenue-agency/corporate/about-canada-revenue-agency-cra/disability-advisory-committee/2020-client-experience-report.html>.

<sup>102</sup> Authors' calculations using data published by the Canada Revenue Agency for the 2021 tax year. Canada, "T1 Final Statistics 2021 edition (for the 2019 tax year)," 2021, accessed November 20, 2022, [https://www.canada.ca/en/revenue-agency/programs/about-canada-revenue-agency-cra/income-statistics-gst-hst-statistics/t1-final-statistics/2019-tax-year.html#tables\\_in\\_PDF..](https://www.canada.ca/en/revenue-agency/programs/about-canada-revenue-agency-cra/income-statistics-gst-hst-statistics/t1-final-statistics/2019-tax-year.html#tables_in_PDF..)

<sup>103</sup> Authors' calculation using Statistics Canada Table 13-10-0374-01, "Persons with and without disabilities aged 15 years and over, by age group and sex, Canada, provinces and territories", *Canadian Survey on Disability 2017..*

happen as a consequence of the government’s commitment to substantive involvement and co-design, not simply consultation, with the disability community.

We note that the 2023 federal budget allocated new resources to Employment and Social Development Canada to continue work on the CDB “including engagement with the disability community and provinces and territories on the regulatory process”.<sup>104</sup> The regulatory process allows the executive branch of government full control over the drafting of proposed regulations with final approval generally granted by the Governor in Council on the advice of Cabinet.<sup>105</sup> While draft regulations must be published in the Canada Gazette, the traditional regulatory process often limits interested stakeholders to a reactive role to what has been proposed, and within restrictive timeframes. Even when responsible departments conduct stakeholder engagement early on, the exercise still sees stakeholders excluded from the internal work to identify key policy questions, conduct analysis on likely impacts and draft proposed regulations. In the case of the CDB, the text of the regulations will be the instrument for decision-making over how the benefit will be structured and delivered. The standard regulatory process is no substitute for true inclusive co-design that would ensure Canadians with disabilities in the room and at the table when the regulations are developed. The framework outlined in this paper will, we hope, serve as a useful reference for officials and all stakeholders involved.

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<sup>104</sup> Freeland, 2023. *Supra* at note 43. See page 146 of the budget document.

<sup>105</sup> Treasury Board of Canada Secretariat, “Policy on Regulatory Development” (Ottawa: Ontario, Government of Canada), accessed March 31, <https://www.canada.ca/en/government/system/laws/developing-improving-federal-regulations/requirements-developing-managing-reviewing-regulations/guidelines-tools/policy-regulatory-development.html>

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