

VICEREGAL PATRON

Her Excellency the Right Honourable
Mary Simon, Governor General of
Canada

**PRÉSIDENTE D'HONNEUR
VICE-ROYALE**

Son Excellence la très honorable
Mary Simon, gouverneure générale
du Canada

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The Honourable Jason Nixon
Minister of Assisted Living and Social Services
c/o adapengagement@gov.ab.ca.

September 12, 2025

Dear Minister Nixon,

On behalf of March of Dimes Canada (MODC), we welcome the opportunity to respond to the Government of Alberta's public consultation on the new Alberta Disability Assistance Program (ADAP).

MODC is a leading national charity committed to championing equity, empowering ability, and creating real change that will help people with disabilities across the country unlock the richness of their lives. We're paving the way for people with disabilities to experience full and meaningful lives in an inclusive world.

This submission is informed by MODC's Benefit Without Barriers report (enclosed), and our many years of experience developing and delivering employment services for people with disabilities in multiple jurisdictions across Canada, including:

- Specialized assessment services tailored to the unique needs of clients in rehabilitation settings.
- Employment placement referrals for people with disabilities.
- Online Employment Services, which provide comprehensive support to people with disabilities, empowering them with the skills to enter and excel in the workforce.

We work with communities, businesses and people to create sustainable employment opportunities. From youth to older adults, we offer services designed to meet each candidate's unique needs and enable them to reach their employment goals, serving 15,666 clients nationally in 2024-25. We engage with thousands of employers nationwide, and have key partnerships with Microsoft, DIGITAL, Service Canada, Scotiabank, CIBC Foundation, TD Bank, and CASE.



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Comments and Recommendations:

We have identified several issues following review of the discussion guide and have provided accompanying recommendations.

1. Eligibility

a. Definitions of eligibility

Issue: Episodic disabilities are referenced in medical eligibility for ADAP but not Assured Income for the Severely Handicapped (AISH), raising the concern that those with episodic disabilities will be pushed onto ADAP even if their episodic disability realistically prevents them from working. The uncertainty many people with episodic disabilities face means they may be able to work for certain increments but find it very difficult to find employment that is itself episodic in nature and aligns with the periods in which they are able to work.

Issue: The concepts of “capacity to work,” “significantly restricted from working,” and “severe and prolonged disability” are, at this stage, vague and primarily framed from a medical perspective. It will be essential to provide transparency about and specify the evaluation methods and exact criteria, informed by a disability equity and social model of disability lens. There are a host of employment barriers that people with disabilities face, including attitudinal barriers and discrimination, and these must be considered in any evaluation.

Recommendation:

- Define terms using a disability equity lens. Episodic conditions and mental health disabilities must be more clearly defined, informed by those with lived experience and the social model of disability, to reduce uncertainty regarding access to both programs. Similarly, to prevent people with disabilities being disadvantaged due to the existence of structural barriers to employment, any eligibility criteria such as “capacity to work” must be approached in a similar way.

b. Income and other supports

Issue: The proposed model introduces multiple income support pathways in Alberta—namely, AISH, ADAP, and a category referred to as “other income supports” for people who do not meet the criteria for a severe and prolonged impairment. However, the nature, eligibility criteria, and application process for these “other income supports” is unclear based on the content of the discussion guide. This lack of clarity poses a risk of exclusion for those who still require financial assistance but do not qualify for AISH or ADAP.

Issue: Eligibility for ADAP includes “people who are not currently employed but are deemed to have the potential to be employed in the future, with appropriate

supports.” This does not appear to consider the actual availability of appropriate employment, or to what extent the ‘appropriate supports’ are available.

Recommendations:

- Clearly define and publicize “Other Income Supports”. Provide detailed information on what programs fall under “other income supports,” including eligibility criteria, benefit levels, and how they differ from AISH and ADAP.
- Ensure seamless access to application processes. Develop a streamlined, accessible application process for these supports, with clear guidance and support available to applicants. This should include alternate formats and assistance for individuals with limited digital literacy or access.
- Establish a continuum of support to ensure that individuals who do not meet the threshold for AISH or ADAP are not left without assistance. Income support programs should reflect the full spectrum of disability and health-related barriers to employment and financial independence.
- Integrate navigation and referral services. Equip service providers and case managers with tools to help individuals navigate the system and connect with the most appropriate support program based on their needs.

2. Application, adjudication, appeals

a. Inclusive adjudication and appeals panels

Issue: It is not clear in the proposed adjudication and appeals process whether adjudicators and members of the Medical Review and Appeal Panels have appropriate training or lived experience related to disability. This creates a risk that applicants may not be appropriately assessed.

Recommendation:

- Ensure that all decision-making bodies include professionals with disability-specific training and/or lived experience to promote fair, informed, and empathetic assessments.

b. Creating a barrier free application process

Issue: People with disabilities may face financial and logistical barriers when completing the online application form, depending on the complexity of the final product, access to qualified health care providers, and their access to technology. Applicants may lack access to technology or digital literacy skills needed for online applications. Online-only applications exclude individuals with limited internet access or digital literacy. Repetitive documentation and complex processes can hinder access to benefits (see our enclosed report, *Benefit without Barriers*, for more detail).

Recommendations:

- Provide reimbursement for form-filling expenses and allocate funding to community organizations (e.g., Voices of Albertans with Disabilities) to offer direct support to applicants.
- Establish service centres or partner with agencies to offer in-person or phone-based assistance, including access to computers and trained staff to help complete applications.
- Consider using eligibility for the Disability Tax Credit (DTC) as a gateway to provincial programs, given its established criteria of “severe and prolonged impairment,” or generally simplify processes, minimize duplication, and ensure applicants are not required to resubmit the same information multiple times. While the process of applying for the DTC is itself barriered, those who have taken the steps to complete DTC applications have already done the work of documenting their “severe and prolonged impairment.”
- Offer alternate formats, including paper applications, phone-based support, and in-person assistance to ensure equitable access for all applicants.

c. Reapplication and appeals

Issue: There is a lack of clarity in the discussion guide around timelines and procedures for reapplying to AISH following changes in medical diagnosis.

Recommendation:

- Ensure reapplication timelines are timely, and clearly define and communicate the reapplication process, including timelines and documentation requirements, to ensure transparency and accessibility.

Issue: Given AISH and ADAP applicants already face financial precarity, applicants denied AISH may lack resources or guidance to navigate the appeals process.

Recommendation:

- Dedicated support services for individuals appealing AISH or ADAP decisions, including legal aid, advocacy, and case management should be established prior to the implementation of ADAP.

3. Benefit rates, income and asset exemption

a. Impacts of difference between payment rates

Issue: Individuals on ADAP will receive a lower monthly payment than those on AISH—approximately \$200 less per month or \$2,400 annually—despite having similar living expenses, especially before securing employment.

Recommendation:

- Align ADAP and AISH payment rates until employment is secured. Only reduce ADAP payments once the individual begins earning income through work. This ensures that people are not penalized financially during their transition to employment and maintains income stability during a vulnerable period.

b. Using individual vs. household income to determine benefits

Issue: Financial independence is a cornerstone of dignity and safety. Policies should empower people with disabilities to manage their own finances and avoid situations where they are entirely reliant on a partner for basic needs, which makes people more vulnerable to spousal or other domestic abuse. Current rules outlined in the discussion guide around asset and spousal income may inadvertently create financial dependency on a spouse, undermining autonomy and increasing vulnerability to abuse or control.

Recommendation:

- Review and revise asset and spousal income exemptions to promote individual financial independence. Consider increasing exemption thresholds or expanding exemptions for spousal earnings.

c. Impact of reduced ADAP payments on poverty

Issue: Research shows that positive reinforcement is more effective than punitive measures in encouraging behavioural change. Reducing income before employment is secured may discourage participation and increase hardship. Incentives should reward success, not penalize effort. A \$2,400 annual reduction in ADAP compared to AISH represents a significant financial loss for people with disabilities already living in poverty.

Recommendation:

- Reassess the rationale behind reduced ADAP payments. If the intent is to incentivize employment, shift toward positive reinforcement strategies—such as more generous employment income exemptions, transitional earnings support, or bonuses for sustained employment.

4. Employment services (ES) and expectations

a. Clear commitment to employment supports

Issue: There is currently no clear articulation of the employment supports available to ADAP recipients deemed “able to work.” There are a range of proven supports that could be incorporated as part of ADAPs rollout, including experiential work, paid internships, supported work integration, school to work transition programs that could be explored.

Recommendation:

- To ensure ADAP meets policy goals, government must publicly commit to a comprehensive, well-funded employment support framework that is accessible to all Albertans, regardless of geographic location. This framework must be in place and clearly communicated before ADAP is implemented.

b. Training and Equity Lens for Service Providers

Issue: Effective employment support requires specialized knowledge and sensitivity.

Recommendation:

- All ES providers must be trained in disability equity and cultural competency, tailored to the populations they serve. This ensures services are inclusive, respectful, and effective.

c. Capacity of service providers

Issue: A province-wide transition to ADAP may significantly increase demand for ES, and it is unclear to what extent providers are ready for this transition.

Recommendation:

- Conduct a readiness assessment and expand capacity of service providers to meet anticipated demand. This includes staffing, infrastructure, and regional coverage.

d. Procurement and Delivery of Employment Services (ES)

Issue: Uncertainty exists around how ES will be delivered—via amendments to existing contracts or new tenders.

Recommendation:

- Government should clearly outline the procurement strategy and prioritize providers with proven experience in disability employment and inclusive practices.

e. Employer engagement and incentives and support for self-employment

Issue: People with disabilities in Canada continue to experience unacceptably high rates of unemployment and underemployment, despite the existence of employment services throughout the country. According to Statistics Canada, only 46.4 per cent of working-age adults with disabilities are employed, compared to 66.2 per cent of those without disabilities – even though they are more eager to work than their non-disabled peers. This gap persists even though many people with disabilities report a strong willingness and motivation to work.

Even when employed, people with disabilities face systemic inequities in the labour market. In 2024, they earned an average of \$2.22 less per hour than their non-disabled counterparts. This wage gap reflects both systemic discrimination and a lack of accessible, inclusive workplace practices that support long-term employment. Due in part to these factors, and the need for some people with disabilities to have flexible work schedules, self-employment supports could also be considered in an overall strategy to ensure ADAP meets policy goals.

Furthermore, Indigenous peoples, newcomers, racialized communities, LGBTQ2S+ people with disabilities face intersectional barriers to employment that must be addressed with a culturally specific approach.ⁱ

Over the years, MODC has worked to convene stakeholders, facilitate partnerships, and build inclusive workplaces in multiple jurisdictions across Canada. We would be pleased to offer our expertise in employer education, partnership development, and community engagement to support ADAP's rollout.

Recommendations:

- Government should ensure services, supports, education and incentives will be put in place to:
 - ensure employers are aware of the benefits of hiring this typically untapped source of talent. This could include launching targeted employer education campaigns and offer financial incentives (e.g., wage subsidies, tax credits) to promote inclusive hiring and retention.
 - address systemic discrimination and a lack of accessible, inclusive workplace practices that support long-term employment. This could include toolkits, training, and ongoing support to employers to help them meaningfully accommodate and retain employees with disabilities.
 - be inclusive of diverse populations and ensure that data collection/reporting include equity-deserving groups.
- Include tailored supports for self-employment within the ES framework, such as business planning assistance, microgrants, mentorship, and access to digital tools.

f. Avoiding precarious employment

Issue: As previously referenced, people with disabilities in Canada experience high rates of underemployment and make significantly less per hour than non-disabled people. It is not clear from the detail provided in the discussion guide what safeguards will be put in place to prevent ADAP recipients from being pushed into precarious employment that will leave them trapped in a cycle of poverty.

Recommendation:

- Establish safeguards to prevent placement into precarious employment. Case managers and service providers should be evaluated based on Key Performance Indicators (KPI) that prioritize job quality, autonomy, and long-term sustainability—not just speed of placement or solely on full-time employment status.

5. Client transitions**a. Reducing financial risk to clients during transition**

Issue: The proposed transition of all clients to ADAP with the expectation that eligible individuals will apply for AISH introduces a significant financial risk for those already living in poverty. ADAP provides a lower monthly payment than AISH—approximately \$200 less—which could result in a loss of up to \$2,400 annually for individuals awaiting AISH approval.

While retroactive payments are noted for successful AISH applicants, the approval process may take several months. During this time, individuals may experience reduced income, which could severely impact their ability to meet basic needs such as housing, food, and transportation.

Additionally, current AISH recipients who are transitioned to ADAP will face a reduction in monthly income. Although an 18-month transition period is planned, this may not be sufficient to allow individuals to adjust their living arrangements or financial commitments, particularly in the context of Alberta's housing affordability challenges.

This reduction in income risks exacerbating financial precarity, undermining autonomy, and negatively affecting psychosocial well-being. It is important to assess whether this outcome aligns with the government's stated objectives or whether it may produce unintended adverse effects.

Recommendations:

- Maintain income parity during transition. Ensure that individuals transitioning from AISH to ADAP retain their current income level until AISH eligibility is determined. This could be achieved through temporary top-ups or bridging payments to prevent income loss during the application period.
- Accelerate AISH application processing: Commit to expedited processing timelines for AISH applications submitted by ADAP recipients to minimize the duration of reduced income and associated hardship.
- Extend and strengthen transition supports: Reassess the adequacy of the 18-month transition period. Consider extending this timeline or providing additional supports (e.g., housing subsidies, financial counselling) to help individuals adjust to new income levels.

Closing remarks

One of the most promising aspects of the ADAP is its focus on providing employment supports for people with disabilities who can pursue work. The commitment to providing tailored supports for workforce participation is a welcome development and aligns with broader goals of inclusion, autonomy, and economic empowerment for people with disabilities.

Several critical concerns must be addressed to ensure the program does not inadvertently harm those it aims to support. The key concerns we have highlighted in this submission are:

1. Administrative complexity and ambiguity in eligibility criteria, particularly regarding the determination of work capacity.
2. Financial risks for applicants in precarious situations.
3. Prevention of precarious employment, addressing systemic barriers to employment and support for autonomy.
4. Access to technology and assistance with applications.

Additionally, there is currently no mention of how the effectiveness of ADAP will be monitored or evaluated after implementation. This is a critical gap, as ongoing assessment is necessary to ensure the program meets its objectives in terms of employment outcomes and overall well-being.

Our final recommendation is for the Government of Alberta create and implement an ongoing and post-implementation evaluation process to assess ADAP's impact on employment, income stability, and psychosocial well-being, and use findings to inform ongoing improvements. This should involve ongoing consultation with people with disabilities and service providers, and the establishment of mechanisms for ongoing feedback, co-design, and collaboration with disability organizations and people with lived experience.

We hope that the recommendations presented in this submission will mitigate or eliminate these risks. We stand ready to support the Government of Alberta in this process and offer our experience, research, and community insight to ensure that ADAP becomes a vehicle for meaningful and lasting impact. We would be pleased to partner with the Government of Alberta in the implementation, training, and evaluation of this new program, in whichever capacity you require, including by participating in advisory committees, working groups, or pilot initiatives.

Sincerely,



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March of Dimes Canada
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ⁱ Hachouch, Youssef, Huda Akef, Carrly McDiarmid, Marysa Vachon, Stuart Morris and Diana Simionescu. Statistics Canada, Reports on Disability and Accessibility in Canada. “Barriers to accessibility related to behaviours, misconceptions or assumptions: Findings from the 2022 Canadian Survey on Disability”. January 27, 2025. <https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2025002-eng.htm>