



Registered Nurses' Association of Ontario
L'Association des infirmières et infirmiers
autorisés de l'Ontario

Hon. Lisa MacLeod
Minister of Children, Community and Social Services
Hepburn Block
6th Floor, 80 Grosvenor St.
Toronto, ON M7A 1E9

Hon. Christine Elliott
Minister of Health and Long-Term Care
5th Floor, College Park 777 Bay St.
Toronto, ON M7A 2J3

April 26, 2019

Re: Potential changes to the definition of disability for the ODSP program

Dear Minister MacLeod and Minister Elliott,

Thank you for giving the Registered Nurses' Association of Ontario (RNAO), along with several other associations, the opportunity to participate in a discussion on March 21, 2019 about the government's intention to develop a new definition of disability. After some additional consultation, analysis, and thought, RNAO would like to provide you with some additional feedback.

RNAO was privileged to participate in the Disability Adjudication Working Group from 2016 to 2018. The diverse group of participants representing people with lived experience; community legal clinics; clinicians representing a variety of health professions and sectors; and health and social policy perspectives provided information, context, and suggestions to further our mutual objective of improving the health and well-being of some of Ontario's most vulnerable residents. Comparing that approach with the more silo-like conversation of separate meetings with various constituencies raises the question of whether the later format helps to replicate our current systemic dysfunctions often characterized as silos. In other words, more creative, effective, and humane approaches might arise from structuring conversations and problem solving as you did with the Disability Adjudication Working Group.

From listening to diverse perspectives, including those of our members, RNAO urges -- in the strongest possible terms -- that the ODSP Program Branch not change the definition of disability. There is compelling evidence^{1 2} that a more restrictive, less inclusive definition of disability would cause great harm by forcing unwell people to access the Ontario Works (OW) program instead of the more appropriate, for them, ODSP program. A strict criteria of disability as severe and prolonged does not reflect the current understanding of some debilitating conditions that can be episodic and recurring. The current ODSP definition better reflects the realities of people's lives by considering: "substantial" rather than "severe" levels of disability; recurrent or continuous disabilities expected to last at least one year; and the impacts of disability on activities of daily living such as personal care, community and workplace.³

Ministers, we urge you to heed RNAO's strong recommendation not to change the current ODSP definition of disability. Please do not hesitate to contact us if we can provide additional information and/or ongoing engagement on these critical health and social policies.

Warm regards,



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Chief Executive Officer, RNAO

CC:

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¹ Income Security Advocacy Centre (ISAC) (2018, Dec.), *Defining disability: What plans to change the ODSP definition would mean to people with disabilities in Ontario*. Toronto: Author. <http://incomesecurity.org/public-education/changing-the-odsp-definition-of-disability/>

² Bloch, G. (2019, April 8). Changing disability definition a dangerous mistake that will harm thousands. *Toronto Star*. <https://www.thestar.com/opinion/contributors/2019/04/08/changing-disability-definition-a-dangerous-mistake-that-will-harm-thousands.html>

³ ISAC, 1-2.