

October 11, 2016

VIA FAX: 250-356-8172

Select Standing Committee on
Finance and Government Services
Parliamentary Committees Office, Rm 224
Parliament Buildings
Victoria BC V8V 1X4



Reply to: Erin Pritchard
epritchard@bcpiac.com
Ph: 604-687-3044

Re: Select Standing Committee on Finance and Government Services – Budget 2017 Consultations

The BC Public Interest Advocacy Centre (BCPIAC) is a non-profit law office, mandated to focus on systemic issues affecting low income people and other marginalized groups. Based on feedback from the communities we serve, BCPIAC has prioritized “access to welfare” as one of our areas of focus. We define “access to welfare” to mean the myriad administrative and procedural barriers that people encounter when trying to access critical income supports from the Ministry of Social Development and Social Innovation (“MSDSI”).

Over the past decade, but particularly in the last five years, MSDSI has radically changed the way it delivers its services. Specifically, it has moved the majority of its services online and onto a centralized 1-866 phone line, while at the same time dramatically reducing its face to face services.

This submission sets out how MSDSI’s service delivery transformation has produced systemic service delivery failures. More specifically, BCPIAC submits that MSDSI’s service delivery model is grossly out of step with the needs, resources and abilities of the populations it serves, resulting in fundamental accessibility issues. We are concerned that while MSDSI attributes its declining caseloads to more clients re-entering the workforce, the reality is that many people are just giving up on accessing the Ministry’s services and critical supports.

In setting priorities for the 2017 provincial budget, we ask that the Standing Committee please consider this submission and recommend that the Ministry’s service delivery issues be immediately addressed. Specifically, for the reasons outlined below, we ask that the Ministry be properly funded such that it can restore in-person, client-centred services, such as:

- offering an option of a facilitated face to face intake/application process;
- making in-person services an ongoing option for every Ministry client that prefers or requests this method of access;
- training Ministry staff in all aspects of the Employment and Assistance Worker (EAW) role (as was done previously) rather than segregating workers into highly

- specialized “streams” and empowering frontline workers to make decisions on service requests; and
- adequately staffing the call centre to reduce wait times rather than arbitrarily limiting call duration.

Much of the referenced research was compiled for a 2015 complaint that BCPIAC filed with the BC Ombudsperson about these issues¹; that complaint will be discussed in the submission below.

MSDSI’s Service Delivery Model

Prior to MSDSI’s service delivery transformation, the Ministry delivered face to face services through case workers. In order to apply for income or disability assistance, an applicant would attend a Ministry office and an intake worker at the counter could facilitate and assist with the application process. Once an applicant was deemed eligible for income assistance or disability assistance, they would be assigned a specific case worker who was responsible for their file. Case workers were able to develop familiarity with their clients and their clients’ particular circumstances – as a result, clients did not have to retell their story with each Ministry interaction, and case workers could make more individualized decisions. Moreover, case workers had regional knowledge and understanding of local services and resources relevant to their clients.

In stark contrast to that model, the Ministry has ended its case worker model and moved the vast majority of services online and onto a centralized, province-wide 1-866 phone line. This shift has been variously referred to in Ministry publications and presentations as the “Ministry’s channel strategy,” “virtually delivered services,” and “a standardized technologically-enabled approach.” We detail issues with each aspect of the Ministry’s service delivery model in the sections below.

MSDSI’s Initial Intake Process

In order to apply for income or disability assistance, applicants must first complete the initial intake application, which is exclusively available online. The application, called the Self Serve Assessment and Application (“initial intake application” or “SSAA”)² is lengthy and complex – it is 90 screens long,³ and asks applicants for detailed information about their income, assets, citizenship and immigration, and employment history. Applicants must answer every question before they are able to click through to the next screen. In other words, the SSAA cannot be submitted partially completed.

¹ BCPIAC, Access Denied: Shut Out of BC’s Welfare System (Complaint to the Ombudsperson regarding service delivery at the Ministry of Social Development and Social Innovation, May 2015) (“BCPIAC 2015 Ombudsperson Complaint”): http://bcpiac.com/wp-content/uploads/2015/09/BCPIAC-Ombuds-Complaint_Final_May-12-2015.pdf.

² <https://www.iaselfserve.gov.bc.ca/HomePage.aspx>.

³ Based on the online version of the SSAA.

The Ministry does not offer assistance with the SSAA.⁴ Our understanding is that applicants who call or go into a local office for assistance with the SSAA are turned away and asked to complete it online. Since Ministry workers are often aware of the difficulties applicants have with the SSAA, they regularly refer people to community agencies for assistance. Referring applicants to community agencies for assistance with the SSAA is an inappropriate transfer of Ministry responsibility onto those agencies. Assisting clients with the SSAA is extremely time consuming, and is a large burden on small, already overextended agencies—further, in some cases, the agencies to which clients are referred are not even in a position to offer such assistance.⁵

Another problem is that the SSAA is available in English only. During consultation meetings, service providers who regularly work with clients with English language barriers informed us that they often have to translate the SSAA for their clients. It was their understanding that the Ministry's interpretation services are not available to applicants completing the SSAA.⁶

MSDSI's 1-866 Phone Line

The 1-866 phone line is the Ministry's toll-free telephone service. The Ministry refers to its phone-based services as “enhanced telephone services” or as “telephony.” In reality, “enhanced telephone services” translates to increased automation and centralization of services through a province wide call centre. Calls are not connected to the caller's local office and callers cannot opt to speak with a particular staff person. It is very unlikely that a caller will be connected with the same staff person if they need to call the phone line again.

The Ministry's standard practice now, even for time-sensitive issues like crisis supplements and immediate needs assessments, is to direct applicants and clients to the 1-866 phone line. Organizations across the province told us stories of clients who were turned away from local offices and were told that they instead had to call 1-866 phone line with their questions. Didi Dufresne, legal advocate and Director of the Legal Advocacy Program at First United Church, describes this problem in her affidavit:

[One] difficulty that I face regularly in my work as an advocate is with the increasing reliance on the Automated Telephone Inquiry line (“ATI phone line”) by the Ministry. The Ministry office in the Downtown Eastside has limited in person services. Some clients who do go to the Ministry for in person services have reported that they are told that they have to call the ATI phone line instead.⁷

⁴ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Dufresne Affidavit at para. 6.

⁵ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Dufresne Affidavit at para. 6; Taylor Affidavit at para. 5.

⁶ BCPIAC Consultation meetings with community agencies serving English as a second language clients, January 27, 2015 and February 4, 2015.

⁷ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Dufresne Affidavit at para. 7.

The 1-866 phone line is daunting to many clients from the first point of contact, in part because of the complicated phone tree a caller must navigate before being connected with a live person. The automated greeting and initial options on the phone line are provided in English only.

Advocates who work with clients with cognitive disabilities and/or mental illness note that the setup of the automated phone service is particularly difficult for their clients to navigate:

Before clients even get to the point of being on hold, they first must navigate the automated list of options on the ATI Line (i.e. the “phone tree”). Clients with serious mental illness are often unable to concentrate or focus to be able to do this. Many clients will simply abandon their call once they encounter difficulty.⁸

Other advocates said that clients who do not speak English fluently also find it challenging to access the phone service.⁹

Once a caller has navigated the phone tree, they are given an approximate wait time and the option to enter their phone number to be called back by a Ministry staff person. Wait times on the phone line are extremely long, averaging an hour and 45 minutes as of January 2016.¹⁰ Given that Ministry services are now primarily delivered through its phone line, the wait time is unsurprisingly a great concern for social service agencies and the clients with whom they work. A number of advocates described the frustration they and their clients feel due to having to regularly wait on hold for long periods to speak to a Ministry staff person about critical issues:

The wait times on the Automated Telephone Line (“ATI phone line”) are often long. I call the ATI phone line on an almost daily basis and I cannot remember the last time where I did not have to wait at least 20 minutes on hold. I do not find that the call back option is an effective solution. I often have clients scheduled back to back; I cannot deal with private client information while another client is with me in my office. When I have used the call back option, I often miss the call back and then have to call back again and wait all over again.¹¹

⁸ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Sutherland Affidavit at para. 7.

⁹ BCPIAC Consultation meetings with community agencies serving English as a second language clients, January 27, 2015 and February 4, 2015.

¹⁰ http://docs.openinfo.gov.bc.ca/Response_Package_MSD-2016-61778.pdf. Although wait times appear to have decreased since, as we will discuss later in this submission, BCPIAC is concerned that the Ministry has reduced wait times by limiting call time rather than increasing staffing in the call centre.

¹¹ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Sketchley Affidavit at para. 6.

Even after a lengthy wait on the ATI phone line, advocates told us that calls are sometimes disconnected or dropped without the client or advocate ever speaking to a Ministry staff person.¹²

Ministry workers have said that during high call volumes, they are pressured to keep calls short (around 10 minutes), and are instructed to “sweep” calls during high call volumes (meaning the call should be limited to two minutes), whether or not the issue is resolved.¹³ The Ministry has said that supervisors will be notified if a call exceeds 10 minutes.¹⁴ We understand that after 10 or 11 minutes, a red “call termination” light will start flashing or that, in some cases, some type of notification or warning will flash on the computer monitor.¹⁵

Our concern with this approach is that Ministry workers may want to stay within such time limits to avoid repercussions from their supervisor for having lengthier calls — whether or not the allocated time is adequate to meet the caller’s needs. For clients with mental health challenges and/or cognitive disabilities, it can be particularly challenging to articulate concerns within such a short span of time.

In the likely event that the call is cut off before the issue is resolved, the client is then required to wait for a call back (if offered) that will not necessarily be on the same day, or call back into the 1-866 phone line and (a) wait on hold again, and (b) speak to a different staff person.¹⁶

As mentioned above, the Ministry offers a “call back option” on the 1-866 phone line whereby callers can request a call back from the Ministry rather than wait on hold to be connected with a worker. This is a useful option for some clients, but obviously does not work for the many clients who cannot afford a phone and are relying on pay phones and courtesy phones in community agencies.¹⁷ Moreover, the call back option requires that clients and advocates remain near the same phone for a lengthy period of time; if the Ministry’s call is missed, the caller must start from the beginning and call the 1-866 phone line again.

¹² BCPIAC 2015 Ombudsperson Complaint, Appendix B, Portman Affidavit at para. 8; Sutherland Affidavit at para. 5. See also: CBC News, “Wait times at BC Social Assistance Phone Line Triple,” online: <http://www.cbc.ca/news/canada/british-columbia/wait-times-at-b-c-s-social-assistance-phone-line-triple-1.2962767>.

¹³ BC Government and Service Employees’ Union, *Choose Children: A Case for Reinvesting Child, Youth, and Family Services in British Columbia* (“Choose Children”), November 2014, online: <http://choosechildren.ca/Choose-Children.pdf> at p. 6.

¹⁴ BCPIAC 2015 Ombudsperson Complaint, Appendix A, pp.4-6.

¹⁵ BCPIAC conversation with representatives from BCGEU Component 6.

¹⁶ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Portman Affidavit at para. 15.

¹⁷ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Portman Affidavit at para. 9; Prince Affidavit at para. 7; Sutherland Affidavit at para. 6.

Online Portal (My Self Serve)

“My Self Serve” is a fairly new service through which the Ministry is increasingly offering its services online. My Self Serve allows users to review their assistance file online (including monthly reports and annualized earning exemption limits), submit monthly report stubs, and upload documents to submit to the Ministry.

While this service is still in development and is currently presented as an optional and convenient way to access Ministry services (i.e. in addition to the phone line and face to face services), we understand from Ministry workers both in the call centre and in the offices that they are increasingly being encouraged to push clients to register for and use this service. The Ministry is also currently in the process of “merging” this service with the SSAA.

While submitting documents to MSDSI through the Online Portable is convenient for some clients, it is less accessible than submitting documents through the mail or by dropping documents off at a Ministry office. In order to use the Online Portal, clients require regular access to a computer and the internet, as well as a scanner in order to upload documents. Clients also require a sufficient level of computer and internet literacy to navigate the online system.

Reductions in Face to Face Services

For Ministry clients who still seek in person services, office closures, reduced in-person service hours at local offices, and Ministry workers’ refusal to answer questions face to face reinforce the 1-866 phone line as the primary way of accessing Ministry services.

Since 2005, the Ministry has closed the following 14 offices¹⁸:

- 610 St. John’s Street in Port Moody (2005)
- 5021 Kingsway in Burnaby (2006)
- 33 3rd Avenue in Burns Lake (2006)
- 1023 Davie Street in Vancouver (2006)
- 2100 Lableux Road in Nanaimo (2006)
- 7388 Vedder in Sardis (2007)
- 504 Cottonwood Avenue in Coquitlam (2009)
- 7953 Scott Road in Delta (2010)
- 828 West 8th Avenue in Vancouver (2013)¹⁹
- 2484 Renfrew St, in Vancouver (2013)
- 60 Needham St, in Nanaimo (2013)

¹⁸ Email from Terri Archer (MSDSI) to Erin Pritchard, dated March 31, 2015, BCPIAC 2015 Ombudsperson Complaint, Appendix A, pp.7-9.

¹⁹ This office did not technically close but stopped providing face to face services to income assistance and disability assistance recipients; these recipients were transferred based on postal code to the China Creek, Mountainview, and Killarney offices. The Killarney and China Creek offices both closed the following year, with these clients then all being transferred to the Moutainview location.

- 475 E. Broadway in Vancouver (“China Creek”) (2014)²⁰
- 2280 Kingsway in Vancouver (“Killarney”) (2014)
- 10095 Whalley Blvd in Surrey (2014)

In many small communities where there are no Ministry offices, generic ServiceBC office are becoming the Ministry “store front” for those communities. This means that a person would go into the same office to apply for a fishing license, for example, as they would to apply for income assistance and other critical income supports. The workers at ServiceBC offices typically have no specialized training to deal with highly vulnerable people, many of whom are in crisis situations. Also, BCPIAC understands that workers at ServiceBC desks are only empowered to accept documents from people and open “service requests” in MSDSI’s computer system, and are not adequately trained in MSDSI legislation and policy to answer clients’ questions.

Conversely, over the same time period, the Ministry only opened one office offering face to face services-- the Balmoral Outreach Office in Nanaimo. The Ministry also opened a Contact Centre in Surrey in October 2014²¹; however, the Contact Centre provides no in-person services, and was created to service the 1-866 phone line.

Unsurprisingly, offices have long lineups for what in-person services are left. Anecdotally, we have heard that the remaining Ministry offices are not adequately staffed – often offices will have four or five wickets, but only one wicket that is actually staffed and open to assist clients.

In addition to office closures and reduced service hours, the Ministry has made other changes that affect in person services. As set out earlier, advocates report that Ministry staff actively discourage clients from attending Ministry offices in person, and instead direct them to use the phone line or the online portal.²² This is particularly problematic for those clients who do not have an advocate. When people are actually able to speak to a frontline Ministry worker in person, those workers are no longer empowered to exercise discretion and make on-the-spot decisions on requests for benefits. As of 2016, it is our understanding that frontline workers now scan an individual’s request into a virtual queue that is centralized for the entire province. Requests are adjudicated by Ministry workers in the order they are received, but not necessarily by workers in the area the request was made. For example, a request made in Vancouver may be adjudicated in Prince George. The person making the request will need to wait for a call to find out if the request has been approved, or keep checking in with the Ministry if the person does not have a phone. This is the case even for urgent requests like crisis grants.

²⁰ These clients were transferred to the Mountainview location.

²¹ Email from Terri Archer (MSDSI) to Erin Pritchard, dated March 31, 2015, BCPIAC 2015 Ombudsperson Complaint, Appendix A, pp.7-9.

²² BCPIAC 2015 Ombudsperson Complaint, Appendix B, Portman Affidavit at para. 19; Sutherland Affidavit at para. 10; Dickinson Affidavit at para. 7; Dufresne Affidavit at para. 7; Sketchley Affidavit at para. 4.

The Ministry frames phone and online services as merely “options” to increase accessibility in its annual reports and service plans and continues to insist that its in-person services are intact. However, the dramatic reduction in in-person services, means that in practice, clients have no choice but to access services through the phone and online services.

Why is this a particular problem for welfare service delivery?

The issues above paint a bleak picture for any government service delivery model, but it is particularly problematic as it relates to income assistance and disability assistance. To state the obvious, people in need of the Ministry’s services have very little money. The provincial government frames income assistance and disability assistance as “programs of last resort.”²³ Eligibility is rigorously income-tested, and applicants do not qualify until they have exhausted almost all other personal assets and available income (including savings). Access to income assistance is therefore about meeting basic needs.

Income assistance and disability assistance rates are shockingly low, and have not had a meaningful increase in over a decade. The current basic income assistance benefit rate for a single person is \$610/month, of which \$375 is designated for rent. For a single person on disability assistance, the rate is \$983/month (as of September 2016). These meagre amounts are supposed to cover everything – housing, food, utilities, and any other basic necessities – and are clearly inadequate to cover those costs. For example, it is virtually impossible for a single person on income assistance to find housing for \$375 per month, leaving them with even less than \$235 per month to pay for all their other expenses. Many MSDSI clients live in unstable housing, and some are homeless.

Needless to say, many people relying on income assistance or disability assistance cannot afford the tools they need to access the Ministry’s new service delivery model, including phones, cell phone minutes, computers, and Internet. As a result, many welfare applicants and recipients rely on public phones and computers, such as courtesy phones in community agencies and computers in libraries. This is problematic for reasons including a lack of privacy, line ups for use, and time limits on use.

Further, many people on assistance have additional barriers such as mental illnesses, cognitive disabilities, physical disabilities, language barriers, communication barriers, low literacy, and/or limited education. Any one of those barriers can compound the difficulty in accessing the Ministry via telephone or online services.

A number of advocates have described clients who are uncomfortable calling the 1-866 phone line on their own and struggle to clearly communicate their concerns over the phone. For example, one advocate said the following:

²³<http://www.newsroom.gov.bc.ca/ministries/social-development-and-social-innovation/factsheets/factsheet-bcs-family-maintenance-program-and-income-assistance.html>.

Many of my clients have described to me the difficulty they have explaining their issue over the phone once they do get through to speak to someone at MSDSI. Many have physical and/or mental disabilities making it challenging in a variety of ways to be able to communicate their issues over the phone.²⁴

Likewise, an advocate at the Kettle Society, an organization that provides support and services to people with mental illnesses, describes the difficulty some of his clients have in communicating over the phone:

Often our clients (and advocates) need to contact the Ministry to deal with complex issues concerning reporting requirements and monthly deductions – some of my clients tell me is very difficult for them to understand what is happening with their benefits without any visual aids (e.g. where the Ministry worker can write things down for the client or show them the computer screen).²⁵

Similarly, requiring completion of a lengthy and complex online form as the first step to apply for income assistance creates a number of barriers to access. Some applicants are uncomfortable dealing with matters as deeply personal and private as applying for income assistance on public computers—and in certain cases, that discomfort is directly related to (and exacerbated by) the applicant’s disability.²⁶ Despite this, as noted above, there does not seem to be an alternative means for filing the initial intake application other than the online form. Advocate Didi Dufresne describes the issue as follows:

I understand the Ministry’s position is that there are no Ministry workers available to assist clients with the online application. On a few occasions, I have written a letter to the Ministry on behalf of a client asking them to provide assistance for the client to be able to complete the online application as the client was not computer literate. I was able to follow up with one of the clients for whom I had written such a letter and learned that a security guard at the office was asked to help the client complete the online form.²⁷

Kris Sutherland, Manager of Advocacy Services at the Kettle Society, describes this issue as well:

The majority of our clients are not computer savvy and many are not even computer literate. In my work I have seen that the move toward the increasing use of online services has had detrimental impacts on clients who are older, have mental health challenges or cognitive disabilities, or are too poor to afford a computer and don’t want to use public computers to work on such personal matters. This is particularly problematic with the initial income

²⁴ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Prince Affidavit at para. 6.

²⁵ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Sutherland Affidavit at para. 17.

²⁶ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Sutherland Affidavit at para. 16.

²⁷ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Dufresne Affidavit at para. 6.

assistance application, as it must be done online, and normally takes approximately 40 minutes to complete even with an advocate's help.²⁸

The drastically reduced availability of in-person Ministry services outlined above has a very real impact on clients, and increases the workload of already overburdened community agencies – clients that require face-to-face services either seek out assistance from community agencies, or give up trying to access assistance at all.

Reductions in in-person services have also meant delays in accessing income or disability assistance for many people. As an advocate from the Kettle Society explains, fewer in person services has meant delays in determining eligibility as well as delays in assessing whether applicants have immediate needs:

Since the process of evaluating eligibility for Income Assistance has been removed from the purview of workers located in Ministry offices and assigned to “virtual eligibility review teams” who communicate only by phone, I have noticed a significant change in the time required for our clients to receive their first cheque. Once a client completes an application for Income Assistance online, they must wait until a Ministry worker calls them to participate in the eligibility review interview. If a client does not have a phone, or if they miss the call, their benefit payment can be substantially delayed. Reduced in-person office service has also meant that Immediate Needs Assessments are not being done in a timely way. I have worked on a number of Immediate Needs Assessment cases that were not processed within the required service standard of one day.²⁹

We regularly hear from clients who find interactions with the Ministry to be demoralizing and dehumanizing. When there was more face to face contact with workers, applicants and recipients found there was more compassion and understanding of their circumstances.

To summarize, the government has consciously made this transformation despite the fact that many users of welfare services lack access to the necessary technology – and many lack the capacity to use it.

Steps taken to address these issues

MSDSI is aware of the service delivery issues described in this submission. Advocates regularly raise service delivery issues on the quarterly regional teleconference meetings between Ministry representatives and advocates.³⁰ These teleconferences are held in each of the five Ministry regions four times per year and are attended by community advocates and Ministry representatives, including the respective region's Manager of

²⁸ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Sutherland Affidavit at para. 16

²⁹ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Sutherland Affidavit at para. 13.

³⁰ BCPIAC 2015 Ombudsperson Complaint, Appendix B, Portman Affidavit at para. 22.

Community Relations and Service Quality. Wait times and call time limits on the ATI phone line, in particular, regularly appear on the meeting agendas.

The BC Ombudsperson's 2015/16 Annual Report indicates that the Ombudsperson received more complaints about MSDSI than any other government ministry or other authority.³¹

During legislative debates, Members of the Official Opposition have brought service quality issues to the attention of the Minister for Social Development and Social Innovation, Hon. Michelle Stilwell, and questioned the wisdom of the move to more online and telephone-based services.³² The Minister responded that the Ministry is moving in this direction to "offer better service and improve the service that clients currently receive."³³ In one exchange, the Minister stated that the uptake of phone service has been really high, and Michelle Mungall, MLA for Nelson-Creston and Opposition Spokesperson for Social Development, pointed out:

What's happening on the ground, is somebody will go to a ministry office and be told to call the 1-800 number or find that that's the only option available to them... Then, when they get to an office, if they want to do an intake, it has to be online. They're directed to a computer rather than doing something one-on-one with an intake worker, as it had been done in the past.³⁴

In May 2015, BCPIAC filed a systemic complaint about service delivery issues with the BC Ombudsperson on behalf of nine advocacy groups and community organizations across BC. The Complainant groups had representation from across all five of the Ministry's service regions. At the heart of the complaint was the incongruence between the changes to the Ministry's service delivery model and the lives of the people it is supposedly designed to serve.

Then Ombudsperson Kim Carter declined to investigate the issues at a systemic level and said that they would prefer to continue to devote their resources to investigating individual complaints.³⁵ BCPIAC is currently working to assist individuals in filing individual complaints about service delivery. So far, we have assisted over 150 people in filing complaints about the issues outlined above.

We shared our systemic complaint with Minister Stilwell and we were disappointed that she did not seem to take the concerns raised in the complaint seriously. For example,

³¹ <https://bcombudsperson.ca/sites/default/files/2015-2016%20Annual%20Report%20of%20the%20Ombudsperson.pdf> at pp. 65-66.

³² British Columbia, Legislative Assembly, Official Report of Debates of the Legislative Assembly (Hansard) Vol. 21, No. 8 (March 11, 2015) at 6682 (M. Mungall).

³³ British Columbia, Legislative Assembly, Official Report of Debates of the Legislative Assembly (Hansard) Vol. 21, No. 8 (March 11, 2015) at 6682 (Hon. Michelle Stilwell).

³⁴ British Columbia, Legislative Assembly, Official Report of Debates of the Legislative Assembly (Hansard) Vol. 21, No. 8 (March 11, 2015) at 6683 (M. Mungall).

³⁵ <http://bcpiac.com/ombudsperson-office-denied-request-for-systemic-investigation-into-inaccessibility-at-bcs-welfare-ministry/>.

Minister Stilwell said she was unaware of long lineups at Ministry offices, that in-person services would always be available to those that need them, and “feedback from clients indicates a growing interest in services available over the phone or online, giving front line staff more time to help those needing extra assistance.”³⁶

BCPIAC is unclear where Minister Stilwell’s referenced feedback was gathered. As far as we are aware, at the time of the Minister’s comments, the Ministry’s most recent survey of income assistance and disability assistance recipients was conducted exclusively online, had an extremely low response rate (around 2.2% of the Ministry’s caseload responded), and even then, the survey response data overwhelmingly showed that people prefer in-person services.³⁷ Another survey was recently conducted in early 2016, concluding in April 2016, this time offering a phone “call-in” survey option; however, as of October 2016, the Ministry has not yet released results of that survey.

BCPIAC made both oral and written submissions to the 2015 Standing Committee on these issues as well.

At the 2016 Union of BC Municipalities (UBCM) Convention in September 2016, delegates passed a resolution calling for adequate and barrier-free access to social assistance. The resolution recognized that the Ministry’s service delivery changes have introduced significant barriers to people on or seeking income assistance and made it excessively difficult for many individuals to receive the support they require, and resolved that the municipalities work with MSDSI to ensure that people requiring help to access income assistance receive it in a timely manner that does not place additional economic burden on that person (e.g. repeatedly using pay as you go minutes waiting on hold for excessive lengths of time or paying for computer/internet usage, etc.) or does not download the responsibility to assist to other service providers without compensation for the additional work.

Ministry workers are frustrated and dissatisfied with the service delivery model

Ministry workers recognize the service delivery transformation as a major problem for both workers and clients. BCPIAC’s systemic Ombudsperson complaint heavily referenced a 2014 BCGEU report entitled *Choose Children: A Case for Reinvesting Child, Youth, and Family Services in British Columbia* that compiled the results of a survey it conducted with frontline MSDSI and MCFD workers.³⁸ That report and the survey results tell a similar story to that which is outlined in this submission. *Choose Children* also demonstrates a concerning level of frustration and dissatisfaction amongst its Ministry worker members with respect to the conditions of their work.³⁹ A central

³⁶ <http://www.vancouver.sun.com/life/always+looking+ways+improve+welfare+services+minister+says/11050407/story.html>.

³⁷ MSDSI *Service Satisfaction Summary Report: Regional Services Division* (“Satisfaction Survey”), October 2014, online: <http://www.sdsi.gov.bc.ca/PUBLICAT/pdf/SDSI-Service-Satisfaction-Summary-Report-Oct-2014.pdf>.

³⁸ *Choose Children*, *supra*, note 13.

³⁹ *Choose Children*, *supra*, note 13.

problem workers identified in the report related to the lack of training front-line staff had received in the Ministry's new and radically different service delivery model:

The province-wide centralization of services through local call centres was implemented without appropriate training and the required experience amongst employees working in these facilities. Many members reported a growing incidence of information errors, misdirected calls, unnecessary or duplicate requests, and an overall delay in service to clients.⁴⁰

Ministry front-line workers acknowledged problems with chronic understaffing and an expectation of unpaid overtime. Moreover, front-line workers identified both the Ministry's computer system and the 1-866 phone line as acting as one of the central barriers to being able to effectively deliver services to clients.⁴¹ Problems identified with the 1-866 phone line included: callers often being unable to get through; clients being unable to understand the phone system; incorrect information frequently provided to clients; and extreme call backlogs necessitating so-called 'sweepers,' where workers are limited to two minute calls.⁴² The computer system was described by one Employment Assistance Worker as a "slow, ineffective, unreliable system" that "cannot handle the work we do."⁴³

An Employment Assistance Worker in the Lower Mainland describes the daily desperation of clients navigating this new service model:

Clients having to wait months to be assessed for Income Assistance results in desperation. Delays in being assessed for assistance are creating homelessness. Inevitably, our clients scream, yell, swear, break things, and either verbally or physically assault staff. This problem weighs staff down and creates a stressful work site which over time affects everyone.⁴⁴

In addition to *Choose Children*, which is a public report, the BCGEU also provided the Ministry with a compiled report of the data it gathered from MSDSI front-line workers—data which set out the major accessibility issues created by the Ministry's new service delivery model.⁴⁵

It is a powerful point that this so-called "standardized technologically-enabled approach" is not working for anyone that interacts with it, on either side of the counter.

⁴⁰ *Ibid* at p. 20.

⁴¹ *Ibid* at p. 9.

⁴² BCPIAC 2015 Ombudsperson Complaint, Appendix C, BCGEU MSDSI (Component 6) Members Survey – BCGEU Choose Children report, November 6, 2014 ("Component 6 Survey"), p.4.

⁴³ *Choose Children*, *supra* note 13 at p. 18.

⁴⁴ *Ibid* at p. 15.

⁴⁵ BCPIAC 2015 Ombudsperson Complaint, Appendix C, BCGEU MSDSI (Component 6) Members Survey – BCGEU Choose Children report, November 6, 2014.

These service delivery issues must be prioritized and addressed

MSDSI boasts declining caseloads, implying that it is assisting people in joining or re-entering the workforce⁴⁶ – yet this is not necessarily what is happening on the ground. MSDSI’s service delivery model is effectively barring many members of the community from accessing critical income supports. We would not accept this level of service quality in any other public service; it is unacceptable that the most vulnerable people in our communities are being further marginalized in this manner. Those who are contacting the Ministry are most likely doing so because their basic needs are not being met; the importance of being able to reach a person and receive timely decisions on their requests is particularly imperative. Dollars ostensibly being saved through the Ministry’s ineffective service delivery model will inevitably create costs pressures for other public services when people are unable to access help to meet basic needs – see, for example, an extensive report by the BC Office of the Canadian Centre for Policy Alternatives on the costs of poverty to the health care system, the justice system, and in foregone economic activity.⁴⁷

BCPIAC urges the Standing Committee to recommend that the Ministry’s service delivery issues be immediately addressed. Specifically, we ask that the Ministry be properly funded such that it can restore in-person, client-centred services, such as:

- offering an option of a facilitated face to face intake/application process;
- making in-person services an ongoing option for every Ministry client that prefers or requests this method of access;
- training Ministry staff in all aspects of the Employment and Assistance Worker (EAW) role (as was done previously) rather than segregating workers into highly specialized “streams” and empowering frontline workers to make decisions on service requests; and
- adequately staffing the call centre to reduce wait times rather than arbitrarily limiting call duration.

We can only assume that the continuing move toward “a standardized technologically-enabled approach” is at least in part a matter of cost cutting and/or inadequate funding. However, BC is doing well economically, currently celebrating a \$1.9 billion surplus, and projecting further growth. The level of revenue to which this government currently has access can and should translate into greater funding for services aimed at improving the lives of those in our province with the least. In our view, it is incumbent on the government to make accessible welfare service delivery a priority in this budget.

All of which is respectfully submitted,

BC Public Interest Advocacy Centre

Erin Pritchard & Kate Feeney
Staff Lawyers

⁴⁶ BC Government, *Ministry of Social Development and Social Innovation 2014/15 Annual Service Plan Report*: http://www.bcbudget.gov.bc.ca/Annual_Reports/2014_2015/pdf/ministry/sdsi.pdf at pp. 5 & 8.

⁴⁷ See Iglia Ivanova (2011), *The Cost of Poverty in BC*, Vancouver: Canadian Centre for Policy Alternatives, Public Health Association of BC, and Social Planning and Research Council of BC. Available here: <https://www.policyalternatives.ca/costofpovertybc>.