



February 28, 2023

OACAS response to the proposed regulatory amendments and policy directive to strengthen supports for youth leaving the care of children's aid societies

Proposal number: 23-MCCSS003

Introduction

The Ontario Association of Children's Aid Societies (OACAS) is a provincial membership organization representing 47 of Ontario's 50 mandated children's aid societies and Indigenous Child and Family Well Being Agencies, as well as 2 pre-mandated Indigenous Child and Family Well Being Agencies. We work with our members by providing supportive practice tools, educational opportunities and training, as well as communication and advocacy supports to help achieve equitable outcomes for children, youth, and families.

OACAS appreciates the province's efforts to respond to the needs of youth transitioning out of care by introducing a new program – Ready Set Go (RSG). It is critical to enhance the services and supports for older youth and youth transitioning out of care to improve outcomes.

OACAS welcomes the opportunity to provide feedback regarding the proposed regulatory amendments and policy directive associated with RSG. **Based on the policy directive as written, a number of youth could officially transition from care on September 30, the National Day for Truth and Reconciliation. We urge the government to reconsider this decision.** This day honours the children who never returned home and Survivors of residential schools, as well as their families and communities. Recognizing the tragic and painful history and ongoing impacts of residential schools is a vital component of the reconciliation process and having this transition period end on this important date is disrespectful and hurtful.

Our feedback cuts across three topics: sector impacts, language, and operationalization and implementation. Please see below.

Key Considerations: Sector Impacts

The new program, which will come into effect on April 1, 2023, increases the age of eligibility for supports and services to a young person's 23rd birthday. RSG also increases the level of financial support eligible youth will receive monthly. It is critical that the Ministry of Children, Community and Social Services (MCCSS) consider and address the immediate impacts these changes will have on agencies. Among others, financial and administrative impacts are of particular importance.

The expanded age-eligibility and increased level of financial support will have an immediate impact on agencies. For some, this may cause further financial strain among agencies. This financial strain will be acutely felt by agencies who are already navigating challenging fiscal

pressures, including deficits. Moreover, members have observed that the delayed timelines for reimbursement of targeted subsidies is one of the major cost drivers leading to cashflow problems in the sector. OACAS strongly urges MCCSS to ensure funds are immediately accessible when the program comes into effect so agencies are able to disburse funds to youth and improve timelines for reimbursement in the long-term.

The expanded age-eligibility for supports, increased financial supports, and the enhanced work that will be required starting at the age of 13 for eligible youth also comes with administrative impacts. For instance, education and training for staff, additional reporting and monitoring requirements, and record-keeping. These changes will affect workload, workflow, and impact staffing. MCCSS posits that administrative impacts will decrease in the long run. OACAS urges MCCSS to closely monitor and review how the new program impacts sector workforce workload to ensure agencies have the capacity to effectively implement RSG.

OACAS also urges MCCSS to support agencies where specialized staff are not in place. Agencies have advised there is variability across the province when it comes to the teams supporting youth transitioning from care. For example, some agencies do not have dedicated youth-in-transition workers and/or youth workers. We also encourage Ontario to invest in the human and community services sector. Investment in this sector is critical; the province must ensure there are community service workers, including youth-in-transition and youth workers, ready to collaborate with agencies and youth in their care as they prepare for independence.

The policy underpinning RSG clearly strives to take a youth-centered, holistic approach to promote life skills, financial literacy, and skills that will assist a child in identifying their goals and achieving them. OACAS welcomes this integrated, comprehensive approach as multiple systems are responsible for the safety and well-being of children and youth. As a result, this policy will not just affect child welfare agencies. It impacts service providers from other sectors supporting children, youth, families and their communities.

The success of RSG will depend on the strength of social infrastructure in communities across the province. It will also depend on the awareness and commitment of community-based organizations from multiple sectors – across the continuum of care – to provide young people from care with the additional supports they require to be successful. Members have observed that community-based supports have become increasingly scant, splintered, and siloed. As a result, agencies are left to fill the gaps; this is not a sustainable approach. OACAS strongly urges Ontario to invest in social infrastructure to ensure young people have access to integrated, localized and culturally safe supports and services, regardless of where they live.

While we acknowledge this submission's focus is on the proposed regulatory amendments and policy directive for the RSG program, we wish to take this opportunity to ask that MCCSS also consider reviewing [Policy directive: CW 004-18 – Registered Education Saving Plans \(RESPs\)](#). For those youth who face barriers to post-secondary education, specifically due to disability, this policy should be amended to allow Societies to transfer a youth's RESP

to an RDSP in the appropriate situations. We believe this change would complement the intention and spirit of the proposed amendments and policy directive for the RSG program.

Key Considerations: Language

The policy directive provides direction to agencies regarding the new requirements to prepare youth for a successful transition from the care of agencies to adulthood. In reviewing the directive, OACAS advises MCCSS to refine the language to ensure that it adequately:

- Reflects the strengths and abilities of youth in and preparing to transition from care;
- Acknowledges the important role families, communities, and networks of caregivers play in preparing youth for successful independence, while respecting a child's identity characteristics and cultural connections;
- Recognizes youth with additional needs and/or youth with disabilities;
- Recognizes gender and sexuality as an aspect of a young person's identity;
- Aligns with findings and recommendations detailed in reports from the Paediatric Death Review Committee;
- Acknowledges known risks – such as human trafficking – to youth from care and risk mitigation as a self-care skill; and,
- Aligns with the language of the Quality Standards Framework policy directive (and associated objectives), with special attention to life dimensions.

OACAS also asks MCCSS to revisit the language of requirement #5 under the section entitled "Transitions for Children in Care". OACAS urges MCCSS to strengthen the language regarding notifying the Band or Community in the case of a First Nations, Inuit or Métis child.

Key Considerations: Operationalization and Implementation

In reviewing proposed regulatory amendments and the policy directive, members have expressed concerns related to operationalization and implementation. OACAS strongly recommends that MCCSS:

- Clarify whether agencies are required to offer financial supports associated with RSG to a child in interim society care, customary care agreement, or Voluntary Youth Services Agreement to prevent the uneven delivery/application of RSG across the province;
- Clarify whether agencies are required to offer non-financial supports (i.e., transitional planning) associated with RSG to a child in interim society care, customary care agreement, or Voluntary Youth Services Agreement to prevent the uneven delivery/application of RSG across the province;
- Clarify the hand-off process between the RSG program and Developmental Services Ontario in the policy directive;
- Ensure CPIN system changes are actioned to support consistent documentation, record-keeping, information sharing and reportability;

- Strengthen the language in requirement #6 under “The Ready, Set, Go Program for Youth 18-23rd birthday” to set clear timelines for review (i.e., every 90 days instead of quarterly);
- Clarify how agencies are expected to evaluate the income of eligible youth, and facilitate clear processes by which agencies can work with other government agencies to ensure the evaluation is supportive and not a further burden on youth;
- Outline what agencies should do in circumstances where systemic barriers prevent completion of requirement #8 under section “Transitions Planning for Children in Care”;
- Reference OVOV Best Practices in African Canadian Service Delivery under requirement #3 of “Transitions Planning for Children in Care”;
- Clarify whether an eligible youth living outside of Canada can continue to receive supports if they wish to remain in an agreement;
- Add the following to requirement #28 under section “Documents and Information”:
 - Copies of their most recent psychoeducational and/or mental health assessment and/or individualized education program
 - Specify written information about the RSG program includes information about complaints/dispute resolution
 - Information about their right to request and access and correct their record of personal information under Part X of the *Child, Youth, and Family Services Act*
- Refine Appendix A and make the following changes:
 - Clearly articulate the requirements around involving the Office of the Children’s Lawyer (OCL)
 - Documentation and ID
 - Add immunization record
 - Financial Affairs
 - Add debit card or pre-paid credit card as some youth may encounter difficulties in securing a credit card at 18
 - Include how to file taxes, including filing a nil return to support entitlement to certain benefits
 - Professional Supports
 - In addition to therapist/psychologist/psychiatrist, include registered social worker
 - In addition to Elder, include Traditional Healer
 - Expand checkbox regarding access to primary care (i.e., family physician, registered nurse) to include placement on a waiting list given current difficulties in many areas of the province securing a primary care provider
 - Add a checkbox listing community services professional, specifically a youth-in-transition worker and/or youth worker
 - Medication
 - Expand to include knowledge and access to programs that will cover prescriptions after leaving care, how to fill and refill a prescription
 - Add a section focused on connections to family, community, nation, and/or network of caregivers given the important connection to improved outcomes.

Conclusion

Alongside the Ontario government, OACAS remains committed to working towards an effective system that supports **all** children, youth, and families. We encourage Ontario to review the feedback submitted by Indigenous Child and Family Well-being Agencies and children's aid societies across the province alongside members of the public and sector partners.

We appreciate MCCSS taking the time to review the above feedback and recommendations. For further information or to discuss this feedback further, please contact:

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