

September 20, 2021

OACAS response to 2021 Ontario Permanency Funding Policy Guidelines (OPFPG)

Update policy directive CW003-16

Proposal number 21-MCCSS001

The Ontario Association of Children's Aid Societies (OACAS) is a provincial membership organization representing 48 of the 51 Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, two of which are pre-mandated Indigenous agencies in Ontario. We support member Societies with having the necessary tools, training, and conditions to fulfill their statutory mandate to deliver child protection services and achieve equitable outcomes for children, youth, and families across the province.

Below, OACAS offers feedback regarding the proposed policy directive along with recommendations to strengthen the policy directive and support the permanency and best interests of Ontario's children, youth, and families.

Adoption and Legal Custody

Positive

- OACAS finds that the proposal supports permanency:
 - o It increases the potential for adoptions to take place in families considering adoption who may otherwise be unable to meet the financial threshold
 - o It provides a welcome financial increase by recognizing that annual net family income may have risen over time
 - o It supports continued and seamless care of children, through transferability of supports in the event of death, particularly within families where pre-arrangements (will/legal testament) for care have been made with relatives or close friends

Concerns and Risk

- OACAS finds that the proposal does not address continuous and stable financial support over time:
 - o In the absence of a permanency subsidy for kinship service families, there is risk that agencies and families will continue to request/require an in-care option in order to receive financial support, which in turn deters use of kin service and other lesser intrusive options
 - o Optically the proposal appears to place a higher value on adoption/custody over kinship service, which is contrary to the priority of keeping children and youth with their families and communities through redesign.
 - o Societies facing a deficit will be challenged to continue providing financial supports, and would be better supported to do so by greater direct investment in subsidies

Further Clarification Needed

- Is there a plan for stable and consistent financial support for agencies to provide this subsidy? When subsidies were originally introduced, they were funded 100% by the Ministry. This is no longer the case.

Recommendation

- OACAS recommends that a permanency subsidy be considered for kinship service families that is aligned with adoption and legal custody.

Kinship Service

Feedback to Proposed Changes

Positive

- OACAS finds that the proposal is a good starting point:
 - o It recognizes the barriers experienced by kin families
 - o It creates a baseline from which to further develop kin service practice
 - o It creates an incentive for agencies to actively promote kin service
- The proposal enables greater equity for kin service families with respect to financial supports
 - o The establishment of a base amount will allow for greater consistency across the province
- The increase in the income threshold is helpful to families
- The proposal adds net new service funding
- The proposal acknowledges families' needs for two different types of funding:
 - o Start-up costs
 - o Episodic costs to address children's needs

Concerns and Risk

- OACAS finds that the proposal does not meaningfully promote stability:
 - o It does not support the best practice of keeping siblings together and, therefore, families intact: given that the same start-up costs are available to both caregivers who take in sibling groups *and* those caring for only one child, the former are disadvantaged
 - o It does not take into account cost-of-living differences across the province
 - o Insufficient resources put considerable stress on families rather than strengthening families
- The proposal does not establish a permanency subsidy to support families after child welfare case closure, as recommended by OACAS and societies:
 - o Without a permanency subsidy, there is risk of placement breakdown and/or of children coming back into care
- The proposal does not establish the necessary foundation to make headway on the collective goal of shifting to kinship away from other, less desirable forms of care

Further Clarification Needed

- What impact, if any, will this new funding have on eligibility for Ontario Works or the Ontario Disability Support Program?
 - o Is there a risk that families will have to choose between one form of financial support and another?
 - o Has any discussion taken place within the ministry regarding eligibility for the Ontario Works Temporary Care Allowance for kinship service families?

Recommendation

- OACAS recommends that the ministry work with agencies to implement frequent reviews of kinship service funding to evaluate its efficacy in supporting children to be cared for in kin service

arrangements and its contribution to shifting away from forms of care that have poorer outcomes and are costlier.

Conclusion

OACAS supports the Ontario government's efforts to strengthen its approach to promoting permanency in Ontario through kinship service, adoption and legal custody. However, we urge the government to consider implementing the above recommendations and offer necessary clarification to increase the likelihood that the intent of the proposed policy directive will be achieved.

We make these recommendations in the best interest of Ontarians based on stakeholder feedback and applicable research. We look forward to ongoing collaboration on these important issues, and we would welcome the opportunity to discuss with you our recommendations.

Summary of Recommendations:

1. OACAS recommends that a permanency subsidy be considered for kinship service families that is aligned with adoption and legal custody.
2. OACAS recommends that the ministry work with agencies to implement frequent reviews of kinship service funding to evaluate its efficacy in supporting children to be cared for in kin service arrangements and its contribution to shifting away from forms of care that have unequitable outcomes and are costlier.

Additional Details:

OACAS thanks select members of the Provincial Kinship Service Sub-Committee for their insight and input on this directive.

For more information regarding our submission, please contact:

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