

DRAFT POLICY BRIEF

Policy Recommendations to Promote the Building a Full Life Including a Home of One's Own in Community through Direct Funding

The pursuit of effective and near-invisible supports and services

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DRAFT

Introduction

Over the past year, Community Living Ontario has facilitated a process to review the current policy frameworks for direct funding¹ in Ontario. The process began with the development of a *discussion paper* by a group of experts on direct funding policy. Since late in 2015 that paper has been used to promote public discussion of this important area of policy. The paper has facilitated discussions with people who access direct funding day by day, members and friends of community living, service providers, staff at the Ministry of Community and Social Services (MCSS), experts and others.

The purpose of this new *policy brief* is to begin to use what we have learned through our review and discussions to lay out recommendations for future action. We hope to expand the capacity of the Developmental Services sector to more fully support people to live in a home in the community, build a full, rich life through strong relationships with friends and family and enjoy all that community has to offer. While the starting point for this policy review is direct funding, it is not possible to effectively reform direct funding without reforming other parts of the Developmental Services system as well. In particular, the brief will explore some of the changes needed within the transfer payment agency systems with the aim of evolving an integrated system focused on achieving the best outcomes possible for people. For example, we will explore the need that agencies have for new policy and operational tools that will allow them to evolve within the changing service system. The brief will also explore the need for policy and operational tools needed by families in order to access and manage direct funding effectively, some of which will rely on the collaboration and support of agencies. Our proposals are not intended to “upend” the current agency system; in fact, our recommendations are not even necessarily new but, rather, represent the next logical incremental steps that most service providers are already pursuing. Our recommendations are intended to promote steady growth that will address the needs of families, service providers and the Ministry as we all work to evolve the current system.

¹ Community Living Ontario has long advocated for the availability of individualized funding. Individualized Funding in the view of Community Living Ontario is a method of delivering services by providing funds directly to individuals or their families, so that they can purchase individualized services that support their own vision of how they want to live and how they want to participate in their community. The Ministry of Community and Social Services differentiates between individualized funding and direct funding. What the Ministry describes as direct funding most closely approximates the form of funding we have been referring to when we have called for individualize funding over the years. In this brief we have adopted the term direct funding, consistent with MCSS terminology, when speaking of funds provided directly to an individual (rather than through a transfer payment agency). We will further define these terms later in this paper.

Characteristics of Ideas, Options, and Plans that Make a Difference

Living, options, ideas, and plans that are:

- Individualized
- Person-centered
- One person at a time
- Plan-based
- Community anchored
- Valued role-entrenched
- Relationship-focused
- Contribution-honoured
- Portable

There are many stories that can help to articulate the principles that underlie this paper. Following is an excerpt of one story from the 2009 Community Living Ontario book, *Kirby's Lane*. The story tells of the support Kirby Adam received from his family to purchase a modest fixer-upper home in Pembroke Ontario, the supports provided by his local Community Living association that assisted him to live independently in that home and the friendship and support of his friends and neighbours that helped Kirby build a life there.



Most weekends Kirby enjoys time with his family. But not on Labour Day weekend! In fact, over the past six or seven years a tradition of sorts has been established between Kirby and his friend Norman. Each Labour Day weekend Kirby and Norman join several thousand others at Fiddle Park. It is a busy time of fiddlers and dancers competing and celebrating their love of music and dance. Kirby shares a trailer with Norman, and together they enjoy being in the midst of the hustle and bustle listening to some good old foot stomping, hand clapping Ottawa Valley fiddle music.

One of Kirby's favourite stories to tell is about the birth of the street that was named in his honour: Kirby's Lane. The story goes like this:

There was a well-worn path between the houses of Norman and Armand, who are two of Kirby's friends and neighbours. Because of its high incidence of 'Kirby traffic' it became affectionately known in the neighbourhood as Kirby's Lane. One day, a street sign appeared on that path, and Kirby's Lane officially marked the well-travelled path that connects friends *to one another*.

While the funded supports and services Kirby received from Community Living played a critical role in helping him realize his goals, they were only one element in the success he achieved. Without the support of and engagement with his family, friends and neighbours, Kirby could not have succeeded in creating the life he envisioned. In fact, if his path had not been so entangled with family, friends and neighbours, one might have to consider that the paid supports and services he received had failed to achieve their objective.

While this document will focus on matters of policy and the operation of services and supports to people who have an intellectual disability, we must never lose sight of the purpose of the exercise. The ultimate goal is *not* to create an excellent system of developmental services and supports; services and supports and all of the policy, processes, funding and bureaucracy that drive them are simply tools for achieving the real aim. **The real aim is to figure out how each person who has an intellectual disability can imagine and attain a full life as a contributing member of his or her community no matter what their experience has been to date.**

Unfortunately, for people who access funding and support through Developmental Services, we often hear it said that a person “lives in services” or some other phrases that suggest that the centre of the person’s life are the funded programs and services that surround them. This must stop. Services and supports should never define a person’s life in community. Life in community begins and ends with relationships that one builds and maintains with family, friends and neighbours. **Services and supports should play a *near invisible* facilitating role in helping the person create the life he or she envisions for themselves.**

The legislation that underlies Developmental Services in Ontario is the *Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act* (referred to in this paper as the *Social Inclusion Act*). Since the introduction of the legislation in 2008, we have seen profound changes in how services and supports are accessed and provided. While we can observe and describe the changes to the *systems* that drive Developmental Services, it is more challenging to determine if these changes are actually *helping people achieve the lives in community* that they envision for themselves. Too often we act as if the achievement of excellent supports and services is an end in itself. If the only observable outcome achieved is the creation and maintenance of supports and services and we are unable to observe real social inclusion of the person receiving the support, we must conclude that we have failed in achieving the objective of the legislation and the aims of the community living movement.

The present state of direct funding

Why so many people support the idea of individualized/direct funding

Those who advocate for access to individualized or direct funding do so because they recognize how effective this funding tool can be in achieving the aim of social inclusion. If used correctly, the application of direct funding promotes conversations about a person's life in community and the connections and relationships that the person may already have, or could develop, in their community. Friends, neighbours, aunts, uncles, cousins, siblings, parents and others are invited to contribute and figure out how they can help the person achieve the life they envision. The funding provided by government is seen as a tool to support and augment what already exists in a person's life; it does not replace or displace these supports and resources - which is what happens by design in institutional models of support.

It is important to acknowledge that it is possible to provide such highly individualized supports and encourage a high level of personal engagement with family and community through our community agencies that are funded through transfer of payments. There are many examples of community living agencies in Ontario that have done so. While the intent of this paper is to consider the policy reform needed with respect to direct funding, we will consider how direct funding and agency services align and what overall systemic change is needed to better achieve the aim of social inclusion called for in the Act. Both funding approaches at present need attention if they are to achieve this goal.

The present availability of direct funding

Ontario has reason to be proud of its record on direct funding. The first direct funding program in Developmental Services, Special Services at Home (SSAH), began in 1982. SSAH has been widely praised by those who have accessed it for support and the program has received tremendous support from consecutive governments since its establishment. In 2008, the government passed the *Social Inclusion Act* which created a legislative framework for direct funding. An additional direct funding program, Passport, was established for adults and SSAH was reformed to provide support to children and their families.

MCSS anticipates that by the end of fiscal year 2017/18 there will be 25,000 adults accessing Passport funding and 22,000 children and families accessing SSAH for a total of 47,000 individuals. By that time, funding for the Passport program will be \$255 million and for SSAH \$55 million. The total of \$310 million means that direct funding will represent 15.5% of the approximately \$2 billion developmental services budget.

The present limitations of direct funding and the consequences of these limitations

It remains the case however, that direct funding is not typically available to provide the range of supports that a person might need to live a full life in community. Often, the application of direct funding is limited to the purchase of respite services and a limited range of supports for community participation. While there are no legislative restrictions to direct funding being used for a wider range of disability supports, the current administration of direct funding discourages it.

Achieving a full life in community with the support of direct funding is also hampered by limitations in the amount of funding a person receives. This paper will explore the problem with current caps on funding amount and will also consider how a lack of transparency in how funding is allocated reduces the ability to ensure people receive the funding support they actually need.

Where people are unable to access adequate funds to pay for high quality supports, they often compromise, stretching support dollars by hiring low paid workers or pooling funds with others to create congregated options. As presently configured, the funding mechanism for Passport has the potential to, and sometimes does, make things worse; resulting in outcomes that are significantly inferior to what a person might receive through a transfer payment agency. Congregated/segregated programs being created through direct funding typically have none of the oversight required of agency services and risk the establishment of low quality services with high risk to people being supported. Too often the low quality congregated outcomes that emerge through Passport funding get tagged as personal choices. We contend that they are the result of limited choices that result from an inadequate investment in planning and funding of supports. A promise of adequate funding will provide incentives for people to choose more inclusive, community based options and provide disincentives for the establishment of low waged congregated support options.

Clarifying the current policy on individualized and direct funding

All funds provided for disability supports through the *Social Inclusion Act* are intended to be provided on an individualized basis, whether they are administered on the person's behalf through a support organization or provided as direct funding to the individual. In 2006, MCSS described the emerging funding approach as follows "The transformed funding model will result in a fair approach by basing each individual's budget on a common application form that highlights their strengths, functional abilities, needs and support requirements, taking into

account their access to informal supports.”² The Ministry further clarified that “Once an Individual’s funding for developmental services has been determined, they and/or their family would choose to receive agency funded services or direct funding.”³ This implies that a person will know how much funding they will receive to address their individualized needs before they decide if they want to receive support through an agency or go the route of direct funding.

The following describes our understanding of the policy approach that was intended when the *Social Inclusion Act* was drafted:

Type of funding

- All funds for supports and services are intended to be allocated as **individual funding** based on the identified need of individuals who receive support

How it is delivered

- The individual can choose whether they want their funding to flow to an agency that will provide them the support they need, or
- Flow to them directly so they can purchase their own supports and services

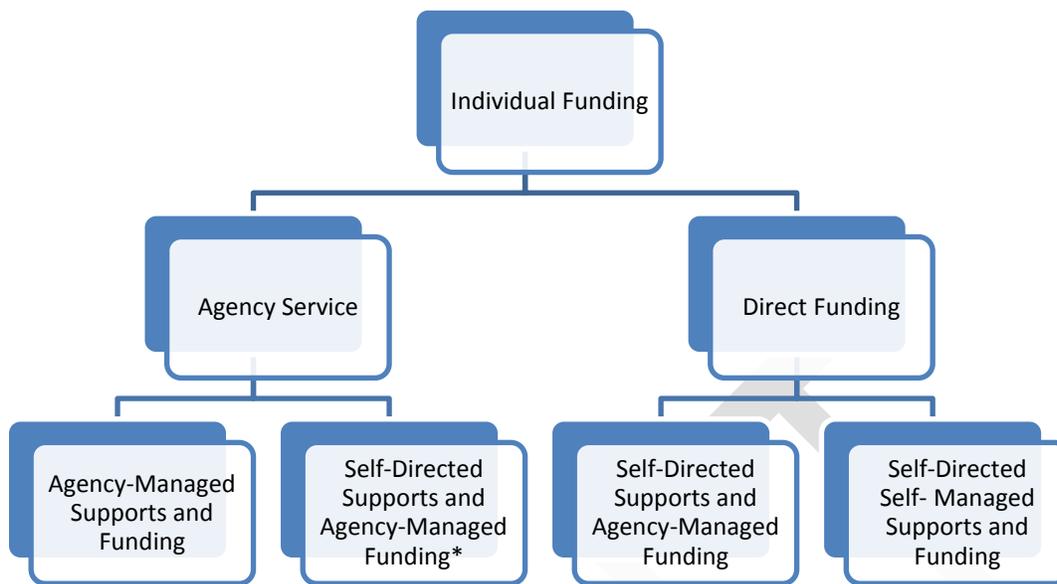
How is it managed and by whom

- People who get their support from an agency might receive services designed and delivered by the agency; or (in some agencies) are invited to identify, design and direct their own unique support plan within the funding parameters of their individual funding allocation (personal budget), relying on the agency to coordinate and/or deliver the identified supports and services.
- While it is the intention that all people who receive direct funding will design and direct their own supports aimed at achieving their personal objectives, they might choose to self-manage the funds or ask an agency to manage the funds.

The following chart provides a graphic depiction of this model:

² Opportunities and Action – Transforming Supports in Ontario for People Have a Developmental Disability, Ministry of Community and Social Services, May 2006 (p 38)

³ p 37



*sometimes agencies flow individual allocations of funds to families and the families manage the funds. In such cases, however, the agency retains overall accountability for the funds.

Ten key areas of reform

The program design described above represents a progressive funding approach through which each person receives a funding allocation that is intended to address his or her unique needs and life plans and provide them some real choice with respect to how to organize and manage their personal supports. This policy direction is often poorly understood and has in fact not been fully implemented. We encourage the Ministry to continue implementation of this approach.

The next section of this paper will look at ten areas of reform that are needed in order to implement such a mechanism as intended by the Social Inclusion Act; the areas of reform include:

1. Clarifying that all funded supports and services are aimed at social inclusion
2. Planning for a life in community
3. Providing adequate funding to carry out plans and being transparent about funding allocations
4. Addressing the reasons people might not choose direct funding
5. Clarifying the policy on combining direct funding
6. Addressing wages for support workers
7. Changing the current vacancy management system

8. Supporting the administration of individualized funding allocations
9. Providing greater flexibility to agencies to manage and reform existing services
10. Being strategic about the investment in buildings

1. Clarifying that all funded supports and services are aimed at social inclusion

Social inclusion vs congregation/segregation

The work group proposes the following definition of social inclusion:

A socially inclusive society is defined as one where all people **are** valued, their differences are respected, **their contributions drawn forth**, and their needs are met **in typical and valued ways** so they can live in dignity among and in valued relationship with all others, and in **in typical life circumstances as enjoyed by all citizens**.

A socially inclusive society is thereby evidenced by people:

- being present in ordinary places in their communities,
- in typical and normative ways,
- in demographically representative groupings,
- holding valued social roles based on their interests and passions and choosing
- wherein they make relevant and welcomed contributions
- in and through their relationships with a range of valued and typical citizens

The work group also considered various approaches for defining segregation and congregation. At the extreme, it is easy to identify service options that are congregated/segregated such as an eight-bed group home of only people who have an intellectual disability. As well, a three-bed group home where the people living in the home have no say in who their roommates are likely fits the definition; while a home occupied by three long-time friends who all happen to have an intellectual disability might not fit the definition.

We can agree that the circumstances of segregation and congregation – whether by “choice” or other – will never lead to the socially inclusive society and life experiences we wish for us all. If we are to achieve our goal of reducing and eventually eliminating segregated and congregated support options and helping every person to create a meaningful life in community, it is essential that we agree on what those outcomes look like. Otherwise, we risk rationalizing and creating/maintaining incoherent and sometimes harmful support options.

Ensuring broad acceptance of definitions of social inclusion and of segregation will only be achieved through a process that builds consensus across the range of stakeholders. While the workgroup has proposed some language, Community Living Ontario would be happy to work with others who are interested in clarifying these critical concepts and we encourage the Ministry to adopt what the community develops as a guide for the evolution of policy and funding.

We recommendⁱ that community partners collaborate to identify and adopt a clear definition of social inclusion and of congregated/segregated services and that the Ministry participate in and support this effort with the aim of adopting the resulting definitions as a guide for policy and operational reform and the achievement of the multi-year targets described in this paper.

Clarifying what funding can be used for

At present funding available both to agencies and through direct funding is used to achieve a variety of aims. Some of the funding contributes to socially inclusive outcomes for people while other funding is used to create congregated and segregated support options or options that leave people isolated and alone; all of which work against social inclusion. **We recommendⁱⁱ that, in order to achieve outcomes consistent with the aim of social inclusion, clear policy exist regarding what funding can be used for, including restrictions on using funds for purposes that work against social inclusion.**

Such a policy should clarify that any new funding that is provided to the Developmental Services Sector, both direct funding and agency funding, must be used to support individualized, community based support options rather than congregated, segregated options. With respect to funding that is currently in the system, the policy should make clear the expectation that, over time, any funding that is being used for purposes that work against social inclusion are expected to change. Later in this document we make recommendations about setting long-term timelines for implementation of this policy and other reforms.

Funding policy and matters of personal choice

Considerations about what funding can be used for too often becomes tied up in and confused with questions of personal choice. For example, a person who chooses a particular path in his or her life that includes congregated activities that will result in social exclusion expects to have access to funding to “honour their personal choice”.

The government, of course, has no right to interfere with the person making such choices as long as that choice does not violate any laws. The government, nevertheless, is under no obligation to provide funding to support any and every choice a person might make. In fact, the

government has an obligation to refuse funding support if it is deemed that the thing that is to be funded runs contrary to the purpose of the funding legislation, i.e. social inclusion.

We acknowledge that such a funding policy will take time to fully implement as families and individuals who currently rely on congregated and segregated options consider and explore alternatives. In fact, our recommended implementation strategy as described later in this document only sets a target of a 50% reduction in segregated service options after ten years. The purpose of this policy and other recommendations that follow later in this paper is to provoke change in the existing mechanisms that provide incentives for congregating and segregating people such as higher funding levels that are currently provided for the provision of congregated services, etc. The proposals also seek to remove existing disincentives for individualizing supports and services such as a lack of support for individualized facilitation and administrative support, etc.

2. Planning for a life in community

Planning and facilitation

Individualized planning has long been recognized as a critical element in individualization of supports and services and the administration of direct funding. Planning provides an important place for conversations between the person who is seeking support and those who can help him or her envision and carry out a plan for an exceptional life in community.

Planning comes to life when it is supported through excellent facilitation that can help a person and family follow through and implement their vision for a good life within the community. Without facilitation planning can be hit and miss and is frequently ineffective in achieving the identified goals. Facilitators stand beside people as they change and help them to reconsider and modify their plans as needed. Planning and facilitation is not an activity but is an ongoing process; nor is it a single event that is solely focused on the service system's need to confirm a person's eligibility for support and or to allocate resources.

In fact, while we typically focus on the importance of planning, it is helpful to recognize that facilitation is actually the primary and most intensive element in the planning/facilitation pairing – ongoing planning is in fact a subset of good facilitation. Person centered planning and facilitation is a means to continually explore one's vision and possibilities for a valued, inclusive community life and to organize thoughts, ideas, actions and resources to enable that vision. The purpose of planning is to envision a future in the community without being tied to societal assumptions that have limited people who have an intellectual disability in the past. Individuals and families need a chance to break free of assumptions and stereotypes and be free to envision a full life in community.

Planning and facilitation should be strongly rooted in the kinds of principles described in this paper and should be encouraged and supported beginning in childhood and continue throughout the school aged years and into adulthood. While the need for planning during the high school years is well understood, there is little to no capacity within the education system to do this well - action must be taken to enhance or augment this shortcoming.

Individualized planning as identified in the *Social Inclusion Act* is a fundable element and the Ministry has specified that \$2,500 per year of a person's direct funding allocation can be used for this purpose. This is a step in the right direction as individualized planning is a key element of support. As a preliminary step towards a more intensive reform recommendation we will make below regarding investments in planning and facilitation organizations, **We recommendⁱⁱⁱ that an immediate policy change be implemented that allows funding for planning be provided above and beyond the actual cost of support that a person requires so that a person does not have to use their needed support dollars for planning and that planning be available on an ongoing basis throughout a person's life.**

When the *Social Inclusion Act* was drafted, Community Living Ontario recommended that individualized planning not only be fundable, but be made available to anyone who is eligible for support under the Act as an entitlement. We also recommended that planning dollars be made available to people before they undergo an assessment through Developmental Services Ontario. If people have an opportunity to plan in advance of entering the Developmental Services system they are more likely to consider the full range of natural supports that are available to them within their community, rather than relying on the Developmental Services systems to address all their needs.

We recommend^{iv} that policy be adjusted to allow funding for individualized planning to be allocated to any person deemed eligible for Developmental Services Funding before they undertake the Developmental Services Ontario assessment process.

Investing in planning and facilitation organizations

We recognize that our recommendations regarding planning and facilitation will provoke a higher demand for these services. It will be necessary for government to invest in the establishment of high quality planning and facilitation organizations in order to ensure they exist in communities across Ontario. Over time we recommend that funding for planning and facilitation shift from its current individual amount made as part of an SSAH or Passport allocation. People would be better served if they had access to planning and facilitation organizations that are funded through transfer payments specifically to provide these supports. Recent investment by the Ministry into independent facilitation services in some communities is a positive development. We look forward to what might be learned from the current projects

as well as those planning and facilitation centres that have been longstanding, and the development of a policy framework to support the growth of independent facilitation to other communities. We encourage the government to take what it is learning from these pilot initiatives and grow over time a system of planning and facilitation services, both independent organizations and services within existing community organizations. **Over 10 years, we recommend a shift that eliminates the practice of individual allocations for the purchase of planning and facilitation supports and the establishment of an adequate supply of planning and facilitation services, funded through transfer of payment, that people can access throughout the province.**

The benefits of this approach would be many, but most importantly this approach would help ensure a higher degree of coherent planning than might be achieved through the current disconnected approach to planning and facilitation. Additionally, providing access to such funding planning and facilitation services would remove any concern of families and individuals that they would have to consider giving up a piece of their support funding for the purposes of planning.

We further recommend that the planning and facilitation services that are created have responsibility for planning with individuals and families throughout all phases of life beginning at birth, through the school aged years, into adulthood and into ones senior years. Of course this recommendation will necessitate collaborate with the various government ministries that have responsibilities during these different life phases.

Investing in planning within agencies

The changing role with respect to planning support within community agencies should be recognized and supported. The movement away from traditional congregated support options as called for in this paper will necessitate significant change in how some agencies plan with people and/or work with independent planners and facilitators. Many agencies today are working to figure out how to isolate real individualized planning from their service planning and delivery operations. Some have succeeded quite well in doing this and we should learn from and expand those practices that work. Agencies should be included in the change recommended above and have access to appropriate transfer payment funding to assist in the development of the planning services they establish.

3. Providing adequate funding to carry out plans and being transparent about funding allocations

The issue with current funding caps

Passport funding is capped at a maximum of \$35,000 per year (\$25,000 plus an additional \$10,000 if the family qualifies for respite). According to MCSS, the cost of residential services is associated with individual needs and residence type. Costs range from a low of \$20,000 annually for Supported Independent Living, to a high of \$150,000 for an Intensive Support Residence, and in some exceptional cases to over \$500,000 for individuals with complex special needs. The cost of a group home, which is the most popular option with over 50% of individuals accessing it, is about \$100,000 annually.⁴ Experience in the field suggest that the cost of a group living residence are even higher than the figures suggested by the Ministry, more typically being \$120,000 to \$140,000 annually per person.

The Ministry has never explained the rationale for the wide discrepancy in funding allotments between direct funding and services provided through transfer payment agencies. Nor has there been an explanation of how the discrepancy aligns with the key principle guiding transformation within Developmental Services of “fairness and equity”⁵.

For many people, the upper limit of funding available through Passport may often prove inadequate to address the full range of supports that might be needed to live in a home of their own. We see no reason why direct funding should not be available to assist people who may have support needs greater than those that can be addressed within the current funding cap.

There is an assertion made by some in the sector, including by some senior people in the Ministry that our current group home system should evolve over time as the place where people with the most complex support needs can be supported. Realigning our current group homes to address such needs would be a mistake. People who have a higher complexity of support need as a result of their disability require a higher degree of individualization in the supports provided. Direct funding, or highly individualized supports provided through agencies provide a vehicle for planning and delivering supports and services that will address the unique plans and support needs of every person. It is illogical to suggest that people who have the most complex support needs will be well served by group living arrangements that were developed to meet the generalized support requirements of groups of people.

Where it is anticipated that an individual will receive equivalent or more appropriate and effective supports through direct funding than through agency services, **we recommend^{vi} that allowable allocations of direct funding be increased so that people requesting direct funding have access to amounts equal to that they could receive if supported in an agency setting.** In

⁴ Figures for residential costs provided by the MCSS Community Development Services Division, November 16, 2015.

⁵ Opportunities and Action Transforming Supports in Ontario For People Who Have a Developmental Disability Ministry of Community and Social Services May 2006

the absence of such a policy, people with complex support needs will continue to be directed into agency services even if their needs could be better supported through individually planned and directed supports.

Accountability for direct funding allocations

Consideration will need to be given with respect to the appropriate accountability mechanism for these higher allocations of funds. It is understandable that a higher level of funding might require a more rigorous accounting on the part of the recipient. Various approaches could be adopted including an approach that requires the support of an agency to assist with the management and accounting of funds if the direct funding allocation exceeds an identified threshold.

In fact, attention is needed with respect to accountability mechanisms for all aspects of direct funding. At present, agencies are closely monitored in various ways to ensure compliance with regulations and the continuing delivery of quality supports and services. There are few accountability mechanisms in place with respect to direct funding. Of course nobody is encouraging that heavy-handed regulations be put in place with respect to direct funding. Eventually, however, it is unavoidable that unintended negative things may occur with respect to a person or persons supported through direct funding. In the absence of a clearly articulated approach to accountability, including risk mitigation, such an occurrence may trigger an unnecessarily aggressive crisis response. **We recommend that, in consultation with stakeholders, consideration be given to reasonable accountability mechanisms and safeguard for direct funding that will help militate against risk and untended incidents and will provide appropriate mechanisms for responding should such an incident occur.** Such mechanism should include a reconsideration of the support needed the individual involved in the incident and an appropriate enhancement of funding where needed to help the person keep on track for achieving the goals he or she has established for themselves.

Accountability for direct funding dollars allocated within agencies

As described in this paper, some agencies are working with families to unbundle the agency funding allocations, creating individual budget allocations and allowing individuals and families to use these funds in various individualized ways. This is a positive development which should be encouraged. Consideration should also be given to any changes in policy that might be needed to support this practice. In particular the work group identified the challenges that will occur if an agency is asked to account for these resources under the current Quality Assurance Measure (QAM) process. We do not see how QAM could be applied to such individual allocations and would likely have a negative impact on the ability of the agency and individual/family to maintain such a funding strategy. Consideration of this and any other

policy matters that might prove a hindrance to the practice should be considered and addressed.

Transparency in funding allocations

The funding entity provided for in the *Social Inclusion Act* has never been established nor has the Ministry shared publicly the mechanism used for determining funding allocations through direct funding. Here is what we know, or presume from what has been shared:

- People who have received funding through the Passport program underwent an assessment through Developmental Services Ontario to determine their support needs
- 6,000 people received funding in the past year
- Presumably, the allocation each person received was based on their assessed needs
- Presumably, a mechanism of benchmarking was used so that people deemed to have higher support needs received higher allocations than those deemed to have less need for support

What we do not know is:

- How were the costs of the supports needed by the person determined?
- Was each individual allocation based on the actual cost of assessed needs, or was benchmarking used to divide the available funding pot into “equitable” pieces?
- For people already supported in the agency system who received direct funding, how was the coordination of the two funding pots handled to avoid duplication?
- What kinds of plans, goals or intentions were funded and how have these actually unfolded?
- Was funding for planning and contract administration calculated separately from and additional to needed support dollars?
- Were existing contracts adjusted in consideration of increases in cost of living?

Allocations for direct funding must be transparent. We must be able to measure to what degree the funding a person receives is adequate to address the support needs for which it is intended. It is an appropriate policy aim to ensure that funds are shared equitably. However, where equitably sharing a finite funding pot among a number of applicants results in some or all of those applicants receiving less than what they need, we should be able to identify the shortfalls with the hope of addressing them at a later time or through other means. We ask that the Ministry make it clear how the outcome of the Support intensity Scale (SIS) assessment was translated into a funding amount.

Many concerns have been raised about SIS by the community, including by people who have taken part in the assessment process. Many have found the process overtaxing and intrusive.

People also raise concern that the SIS is too much focused on the limitations of a person's disability, rather than on achieving the plan a person has for his or her life by identifying what funded support is needed to achieve the objectives in that plan. Recently the government of Alberta committed to reviewing the use of SIS in that province. **We recommend that MCSS undertake to evaluate SIS and determine if it is the best tool for assessing the support people need from the Ministry to carry out his or her personal plans.**

Cost of living funding adjustments

The cost of providing support increases year by year yet there are no mechanisms for adjusting funding to address these increases. **We recommend that a policy be established to automatically adjust funding to address wages for support workers and other support costs on a regular basis in order to avoid any deterioration in the amount and quality of support that a person receives.**

4. Addressing the reasons people might not choose direct funding

At present, given that direct funding is relegated to the fringes of the system (about 15% of funding going to direct funding), there are many reasons that people will be reluctant to choose the option. Families tell us that:

- People are familiar with the traditional service options and trust them based on their long history
- People are not aware that planning of a uniquely tailored support option is available
- Responsive family support models are available in only some areas of the province
- People view direct funding as too onerous an option to undertake (e.g. the legal liabilities and obligations associated with hiring workers, contract administration and reporting, etc.)
- Parents worry about what will happen once they die or are no longer able to actively be involved in the planning of support for their son or daughter; they are more confident in a traditional service option to be there when they are not
- The amount of funding and support available through traditional services are often more substantial than through direct funding
- People are persuaded by professionals that their needs cannot be met through individual supports funded through direct funding
- Navigators are not always knowledgeable about direct funding and direct people away from it
- Misinformation sometimes emerges and frightens families away from direct funding

- Cost of living adjustments are not part of the current funding framework and therefore the capacity of direct funding to provide needed support is eroded over time

Direct funding can be a catalyst for true transformation. **We recommend^{vii} that it be a clearly stated policy objective to increase availability of direct funding and begin to address and eliminate the reasons why people may be reluctant to choose it.**

5. Clarifying the policy on combining direct funding

At present, people who receive direct funding are allowed to combine their funds with others in order to jointly purchase services and supports. While this policy was implemented by the Ministry with good intention, there have been serious unintended consequences of the policy. Often funds are combined in order to create congregated and segregated programs that work against the social participation and social inclusion of the people involved. Such services do not fall under the regulatory system that governs the agencies that operate through the transfer payment system, they are subject to none of the scrutiny and oversight of other agencies. As a result, direct funding is often used to establish congregated and segregated support options that contradict the aims of direct funding and have no regulatory oversight to ensure quality and safety.

While we are not recommending that combining of funds be discontinued completely, **we recommend^{viii} the establishment of a policy to ensure that combining or pooling of direct funding does not lead to the establishment of congregated and segregated support options formed outside of the regulated agency system and that work against social inclusion.**

6. Addressing wages for support workers

While individualized funding has been in place in Ontario as a formal funding option since the inception of SSAH in 1982, the Ministry has never identified a funding policy that would ensure that wages for supports are appropriate and adjusted over time. The result has been that wages paid to support workers who provide support through direct funding have been quite low (often at or just above minimum wage) and there are no mechanisms for providing workers with benefits beyond wages. While there are no provisions in policy that stop people from paying a higher wage, the levels of funding provided have typically made it impractical to increase wages. In fact, many find that maintaining, or where necessary increasing, hours of support year by year has forced a downward trend in wages paid.

Meanwhile, we have made excellent progress in increasing wages paid to workers in agencies over the past decade. As a result retaining workers for direct funding has been an increasing challenge given the availability of much higher paying employment options for workers. In

many communities, wages paid by agencies are close to, and sometimes more than, double, those available through direct funding contracts.

The current situation with respect to wages paid through direct funding is not sustainable. It not only jeopardizes the future of direct funding, but, more importantly has the potential to decrease quality of supports provided and increase risk to individuals.

A policy framework for wages and benefits paid to workers under direct funding is urgently required. **We recommend^{ix} that the Ministry undertake a review of direct funding wages in consultation with stakeholders and develop a policy and funding approach that will provide appropriate and equitable funding to workers.** The approach adopted must provide the flexibility to adjust funding as the amount of support a person needs changes. Families must not be forced to lower wages in order to accommodate a need for more hours of support as to do may put at risk the integrity of the support being delivered.

7. Changing the current vacancy management system

Developmental Services Ontario has established an increasingly restrictive mechanism of vacancy management with agencies. Vacancy management works to maximize efficiency by fully utilizing the services that currently exist. The result has been that agencies have little flexibility with respect to changing the type of supports and services they provide. As long as we continue to simply refill vacancies in residential and other programs with people who are deemed to match the available spot, it is impossible for service providers to transform; they will simply continue to do what they do at present. Such simplistic backfilling of vacancies is poor fiscal management. Further, the slotting of people into available service vacancies contradicts the fundamental principle of individualization. Where a person is offered access to funding resources that are being relocated, they should never be obliged to use those funding resources to purchase the program slot to which the funding was previously allocated. The funding should be made portable, so that the person has a choice to use it in a different fashion with support from the agency, take the funds as direct funding, or ask for support from another agency using the funding.

We recommend^x that a policy be developed to ensure that the first question asked when a “vacancy” becomes available, not be “who can fill this spot?” but “what is the most effective way to use the freed up resource?”

We recommend^{xi} that a revised system make it easy for a person who chooses to do so, to redirect some or all of the new or existing funding that is allocated to them to whatever form of support will best achieve their personal objectives. This may include asking the agency to use the funds to provide a different form of support than was previously provided through

these funds. It may also include directing the funds away from agency services and into direct funding or into another community-based agency service. Where this occurs tools and strategies must be available to the service provider that will allow them to make necessary adjustments to services to address the reduction in funding, including access to increased funding to bridge gaps caused by vacancies. Such a policy is intended to increase individualization and social inclusion. This policy might also increase the overall current funding allocation to direct funding as outlined in our suggested five and ten year objectives outlined later in this document without reducing the ability of agencies to sustain a high quality of services to the people it continues to support.

Such changes would result in a truly transformative shift through which the vacancy management system could begin to work as a tool for reducing reliance on program options that were developed for groups of unspecified individuals in favour of options that are planned and funded uniquely for each person. To ensure that it is successfully implemented, orientation and training will be needed by all those in the sector who will play a role in carrying out the change including agency and DSO administrators, Navigators, Passport Coordinators and others.

8. Supporting the administration of individualized funding allocations

Supporting families to administer direct funding

Most families will need support throughout the entire direct funding process - imagining and planning; working out various and changing implementation strategies; keeping things on track; overcoming critical times; and in ensuring sustainability and relationships. Too often families are discouraged from choosing the direct funding approach because they are not clear on how it works.

As policy evolves and makes it easier to access direct funding to address a wide range of disability needs, work will be needed to help people understand how direct funding works and to encourage its use. Many people seeking support today continue to ask for traditional supports and services without exploring the possibility of accessing direct funding.

Strategies are needed to:

- Provide adequate and separately defined planning resources for all who request this assistance aimed at helping individuals and families imagine what a good life in their community could look like and how it could be achieved
- Communicate more effectively how direct funding works, what the benefits of it might be for some people and how to access it
- Provide individuals and families the information, tools and support they need to explore and utilize the direct funding option confidently

- Expand responsive family support resource centres and related models of service to assist Ontario families throughout the direct funding process as required (including reforms that allow existing community living agencies to play this role)
- Improve access to people for whom English is a second language who at present have great trouble accessing the system or getting help from DSO to walk through the process
- Continue efforts to streamline the administrative and reporting requirements for direct funding and to provide tools to individuals and families to carry out these functions including a separate allocation (separate from the allocation for disability supports) for the administration costs associated with implementation; current policy allows 10% of a direct funding allocation to be used for the administration of funds
- Align the interests and capacities of the transfer payment system with the emerging direct funding system so that transformation and innovation is enhanced throughout the sector
- Provide flexible, as needed supports available to families at all stages of their planning, implementation and building – recruitment support, HR support, orientation and training options, systems information, opportunities to meet with other families and join family-led ideas, groups and projects, crisis and transition period supports
- **We Recommend^{xii} that appropriate investments be made to establish all of the supports that individuals and families will need to effectively use direct funding especially through flexible, as needed, evolving supports in accessible central family locations.**

Cash flow

The way in which funds flow to an individual/family needs to be simplified. Direct funding should be easy for families to use in order to facilitate people undertaking this approach. At present Passport works on a recovery basis which does not work for families especially where large sums of funding are involved. **We recommend^{xiii} that direct funding be provided in advance and simple mechanisms for reporting on the use of funds be developed.** Expansion of direct funding to home supports will typically result in larger allocations of funding. The current recovery mechanism will prove a significant barrier to the use of this funding mechanism for most families.

Addressing agencies costs related to direct funding

Like families, agencies that support people through individualized or direct funding arrangements will need access to funding to cover their administrative costs. As with families, it should not be expected that these administrative costs be taken out of the individual allocation people receive for support, but should be provided in addition to support dollars. By

nature of their structure, agencies will require funding to cover administrative costs that extend beyond those experienced by families. For example, agencies will need to fund infrastructure and overhead, risk and contingency funds and other things that are inherent in the operation of an agency. OASIS recently published a paper that includes a description of these costs. *Offering Services and Supports to People through Individualized or Direct Funding* builds on work of the Provincial Network on Developmental Services 2009 funding Work Group study and provides an outline of the administrative costs agencies will experience related to the provision of Individualized/direct funding.

Issues of agency liability will need to be addressed as well. For example, where an agency is simply providing bookkeeping or other administrative support to a family or individual but has not direct role in the hiring and oversight of workers hired by a family or individual, the agency cannot be held accountable for issues that might arise as a result of the supports that are purchased. Clear policy directives will need to be established so that agencies can provide support to families without assuming unreasonable liabilities.

9. Providing greater flexibility to agencies to manage and reform existing services

For more than 60 years local community organizations, including member associations of Community Living Ontario, have worked to create and evolve progressive supports and services for people who have an intellectual disability and their families. As our understanding of social inclusion has evolved so has our commitment to ensuring that all people enjoy the full benefits of being a citizen in his or her community. We acknowledge that those legacy services that we created and which were designed to segregate and congregate people are no longer contributing to the aim of social inclusion as we now understand it. Unfortunately, many of the existing Developmental Service policies, practices and accountability mechanisms, including vacancy management and a strict adherence to management of funding through the application of detail codes, have made it extremely difficult and sometimes impossible for service providers to evolve the service systems that they operate.

If we are to succeed in reforming the current systems to ensure that they work as instruments to promote social inclusion and, if we are to achieve the overall 10 year objectives described later in this brief, those managing community services must be allowed to change and evolve the services they provide in response to the needs of people they support.

We recommend^{xiv} the establishment of a policy framework that reduces restrictions on the management of community services, allowing Boards of Directors and Executive Directors to

manage within an established framework of principles aimed at promoting social inclusion as a primary aim.

10. Being strategic about investments in buildings

To date, capital investment by MCSS into housing stock has offset a lack of investment in affordable housing by other government ministries and departments that are responsible for housing. Cross-ministry work will need to continue to address the need for affordable, accessible community based housing stock. The work of the sectors Housing Task Force is encouraging and we look forward to the continued learning that will come from trying out different values based approaches to helping people acquire a in the home community. We look forward to trying out various approaches such as a strategy that has been implemented with a high degree of success in some jurisdictions of providing rent subsidies that can be used to access regular housing stock. Such subsidies could be provided as part of the funding for an individual plan that the person establishes.

Social inclusion is not achieved when a person spends his or her time in a location that is specially created for people who have an intellectual disability. Services and supports should always aim to encourage people to participate in and build relationships within regular community settings and activities. We encourage the Ministry to stay on track with the shift towards greater reliance on community resources including homes, day activity locations, etc.

Implementing the recommended changes - setting long-term objectives for reform

This paper has endeavoured to address changes needed to achieve the reform envisioned when the *Social Inclusion Act* was introduced. This brief does not include every policy and operational adjustments that is needed, but is intended to describe key objectives that will result in the most significant change. The proposals are intended to reposition both direct funding and agency-provided supports and services in order to achieve the key objectives of the legislation and create a coherent support system that will best serve families and individuals. Such changes would contribute to the evolution of a system that would:

1. Provide individuals and families the ability to access and use direct funding in order to:
 - Access independent/unencumbered planning and facilitation supports on an ongoing basis in order to develop a plan for a full life in community
 - Access an adequate amount of funding for carrying out their plan including funding to support the person to live in a home of one's own

- Access support from agencies for the management of funding should they choose
 - Avoid having to make choices to dilute the quality of the support they receive by lowering wages paid to support workers in order to stretch the hours of support they can access
 - Avoid having to pool funds and create congregated/segreated support options as a result of underfunding
2. Provide agencies the policy and operational tools needed to continue evolving the services they offer so that each person seeking support is able to:
- Access independent/unencumbered planning and facilitation supports or planning support provided by the agency on an ongoing basis in order to develop an individual plan for achieving a full life in the community
 - Access supports in community settings that are not congregated or segreated
 - Understand clearly the funding allocation that is available to them for carrying out their plan
 - Choose if they want the agency to coordinate their support or self-direct supports that are provided or coordinated by the agency
 - Change the nature of the supports that the agency provides including changes to where and with whom they live and spend their time
 - Switch the agency that provides them support including the ability to move to a different community in Ontario without significantly disrupting the services they receive
 - Access the support of more than one agency or split their funding allocation between agency support and direct funding in accordance with his or her personal plan

The kind of reform that we are proposing in this paper will best be achieved if clear targets are set with respect to the outcomes that are wanted and the timeframes for achieving these outcomes. Given the complexity of the reform, **we recommend^{xv} that the Ministry set goals for a five-year and a ten-year period and that a full review of the progress be conducted after each five year period so appropriate policy and operational adjustments can be made to the reform initiative.**

Part of the reform we recommend is to facilitate migration of funds from agency services to direct funding so that a larger percentage of the overall funding pot is available for direct funding over time. The targets listed below related to this shift should of course be achieved as the result of choices made by individuals and families; nobody should be forced to switch to or accept direct funding in order to achieve system targets or any other policy or funding objectives. To support this goal, changes, including those outlined in this brief, aimed at

evolving how direct funding is accessed and administered must be implemented so that direct funding is well understood and families have access to the supports they need to use it effectively. Direct funding should evolve to be at least as stable and as comprehensive a support option as what currently exists through agencies. It is reasonable to predict, based on experience in Ontario and elsewhere, that if this was the case, direct funding would become a very appealing option, thereby facilitating the achievement of the recommended targets.

Achieving targets that relate to a shift from congregated service options to individualized community support options might require acting against the expressed wishes of individuals and families. As occurred when the government decided to close institutions, or more recently with the announced reform and eventual closure of sheltered workshops, it is to be anticipated that some that currently access congregated services will object to change. Individuals and families should be in complete control over what alternative form of support they receive, with the expectation always being that the change will result in an equal or better level of support and personal outcome than previously experienced. It is appropriate, nevertheless, that government policy restrict the use of funds in the sector if the outcomes being currently achieved run contrary to the established policy objective of social inclusion. It is essential to recognize that people and services may need significant help in planning for and carrying out change. As was the case with the closure of institutions, facilitating a successful transition, without causing undue displacement and anxiety will require planning, knowledge acquisition, resources and, perhaps most importantly, time.

While a deeper analysis may be needed in order to set the final goals and timelines, the following targets appear to be appropriate based on the results of other jurisdictions that have committed to similar policy reforms and are intended to provoke timely action:

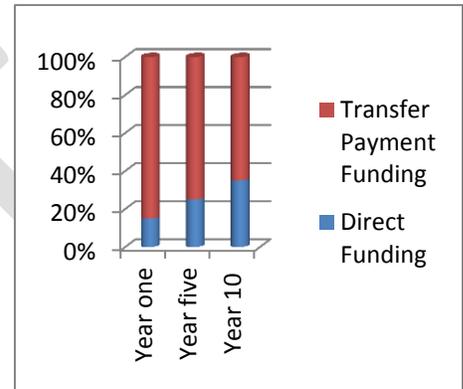
Five year objectives:

- There will be an increase by 10% (2% each year for five years) of direct funding as a percentage of overall Developmental Service funding. This will result in direct funding representing approximately 25% of Developmental Services funding after five years.
- There will be a 10% shift (2% each year for 5 years) in the number of people receiving direct funding to provide a comprehensive range of supports to live in their own home. The result will be that after five years 10% of people who receive funding for a comprehensive range of supports to live in their own home will be funded through direct funding.
- Through changes in policy and operational practices agencies will have greater flexibility to reform services and provide highly individualized supports and services resulting in a 25% reduction (5% per year) over 2016 baseline levels in the number of people supported in congregated service options funded through transfer payments. This target

is aimed at a reduction both at the broad provincial system level and within each agency that provides congregated service options. (a determination will need to be made with respect to the current baseline prevalence of congregated service options based on the established definition recommended earlier in this paper.)

Ten year objectives:

- There will be an additional increase of 10% (2% each year for five years) of direct funding as a percentage of overall Developmental Service funding. This will result in direct funding representing approximately 35% (slightly more than 1/3) of Developmental Services funding after ten years.
- There will be an additional 10% shift (2% each year for 5 years) in the number of people receiving direct funding to provide a comprehensive range of supports to live in their own home. The result will be that after ten years, 20% of people who receive funding for a comprehensive range of supports to live in their own home would be funded through direct funding.
- Through changes in policy and operational practices, agencies will have greater flexibility to reform services and provide highly individualized supports and services resulting in an additional 25% reduction (5% per year) over 2016 levels in the number of people supported in congregated service options funded through transfer payments. This target is aimed at a reduction both at the broad provincial system level and within each agency that provides congregated service options.



Pilot/demonstration projects

This brief recommends policy and systems changes, many of which we believe can be implemented immediately. Following are a number of issues that we suggest would benefit from specific consideration through pilot or demonstration projects. We are not suggesting these as precursors to the recommendations contained in this report. Rather, these are recommended as projects that could be taken simultaneously with and in support of other policy reforms outlined in this paper.

We recommend^{xvi} that consideration be given to funding pilot/demonstration projects to explore the following issues:

- **Using direct funding to address the needs of people deemed to have the greatest need for support**
- **Various accountability mechanisms for direct funding including mechanisms to enable larger allocations of direct funding**
- **Processes for divesting of or reallocating assets currently tied up in buildings that we decide are no longer needed**

And, we further recommend that funding be allocated to study good work that is already being done with respect to this area of reform here in Ontario and elsewhere with the aim of learning and duplicating promising practices.

Measuring change

In establishing goals for reform, it is important to implement a strategy for measuring the progress made towards the targets. **We recommend^{xvii} that evaluation mechanisms based on principles that align with those described in this paper be implemented within Developmental Services to ensure that all policy, operational design and funding allocations contribute to a furthering of the goal of social inclusion and the reduction of supports that congregate and segregated people.** Such a mechanism should include a regular five year policy and operational review of the sector and an ongoing commitment to third party reviews (which might include accreditation) aimed at ensuring quality outcomes within society for every person that receives support.

The review processes, which will focus on personal outcomes in the community, should be developed in addition to, or in place of (as deemed appropriate by the Ministry), the current compliance based Quality Assurance Measures (QAM). It is our view that QAM is an evaluation tool that addresses basic systems accountability objectives (i.e. are the services provided complying with the legislative and regulatory requirement). If implemented, the policy recommendations in this report related to ensuring that all funding is used to promote social inclusion will demand that more sophisticated assessment tools be implemented. While there has been good work done in recent years to improve QAM, it was never designed to measure the degree to which people have achieved their personal goals nor the degree to which efforts are resulting in the achievement of the objective of social inclusion.

Conclusion

The *Social Inclusion Act* has now been in place for more than seven year. In that time we have seen a great deal of change in the regulation and operation of services, but have yet to see a

significant improvement in social inclusion. We hope that such change will come with time and that the recommendations we have made in this brief will help facilitate change. Our aim is to ensure that individually tailored supports and services lead to a greater degree of authentic participation, belonging, valued social roles and relationships in typical community life in ordinary ways (i.e. true transformation.)

We have had enough experience now with the new legislation to begin to understand where some of the flaws in the system design exist. We are not appointing blame to anyone for the flaws; they are to be expected in a mechanism that is trying to address very complex matters. Our aim is to encourage exploration of the changes that are needed to stay on track to achieve the outcomes we have identified.

Community Living Ontario looks forward to working with our members, community partners and MCSS to explore the recommendations in this brief and to continue our work on the other critical issues listed above.

Appendix

Members of the Working Group

This paper has benefited from the input and advice of numerous people including participants at our annual policy forum, groups and individuals who generously agreed to read and comment on the document and many others who the work group members consulted with. We unfortunately cannot provide a complete list of all of those who contributed, but do thank them for helping us to get the paper this far. Following is a list of the members of the work group that has met regularly over the past few years to consider and develop the ideas in this paper:

- Chris Beesley – Community Living Ontario
- Doug Cartan
- The people who sat on the work group are:
- Melodie Cook – Community Living Windsor
- Teresa Dale – Durham Association of Family Respite Services
- Jo-Anne Demick – Community Living Parry Sound
- Kimberley Gavan – Community Living Ontario
- Michael Kendrick – Kendrick Consulting
- John Klassen – Community Living Belleville
- Janet Klees – Durham Association of Family Respite Services
- Gordon Kyle – Community Living Ontario

- Frances MacNeil – Community Living Toronto
- Donna Marcaccio – Rygiel Supports for Community Living
- Judith McGill – Families for a Secure Future
- Marg McLean – Community Living St. Marys
- Peter Sproul – Community Living Kingston and District
- Marg Barb Vyrostko – Community Living Welland-Pelham

Summary of recommendations in this brief

We recommend:

ⁱ that community partners collaborate to identify and adopt a clear definition of social inclusion and of congregated/segregated services and that the Ministry participate in and support this effort with the aim of adopting the resulting definitions as a guide for policy and operational reform and the achievement of the multi-year targets described in this paper.

ⁱⁱ that, in order to achieve outcomes consistent with the aim of social inclusion, clear policy exist regarding what funding can be used for, including restrictions on using funds for purposes that work against social inclusion.

ⁱⁱⁱ that an immediate policy change be implemented that allows funding for planning be provided above and beyond the actual cost of support that a person requires so that a person does not have to use their needed support dollars for planning and that planning be available on an ongoing basis throughout a person's life.

^{iv} that policy be adjusted to allow funding for individualized planning to be allocated to any person deemed eligible for Developmental Services Funding before they undertake the Developmental Services Ontario assessment process.

^v Over 10 years, we recommend a shift that eliminates the practice of individual allocations for the purchase of planning and facilitation supports and the establishment of an adequate supply of planning and facilitation services, funded through transfer of payment, that people can access throughout the province.

^{vi} that allowable allocations of direct funding be increased so that people requesting direct funding have access to amounts equal to that they could receive if supported in an agency setting.

^{vii} that it be a clearly stated policy objective to increase availability of direct funding and begin to address and eliminate the reasons why people may be reluctant to choose it.

^{viii} the establishment of a policy to ensure that combining or pooling of direct funding does not lead to the establishment of congregated and segregated support options formed outside of the regulated agency system and that work against social inclusion.

^{ix} that the Ministry undertake a review of direct funding wages in consultation with stakeholders and develop a policy and funding approach that will provide appropriate and equitable funding to workers.

^x that a policy be developed to ensure that the first question asked when a “vacancy” becomes available, not be “who can fill this spot?” but “what is the most effective way to use the freed up resource?”

^{xi} that a revised system make it easy for a person who chooses to do so, to redirect some or all of the new or existing funding that is allocated to them to whatever form of support will best achieve their personal objectives. This may include asking the agency to use the funds to provide a different form of support than was previously provided through these funds. It may also include directing the funds away from agency services and into direct funding or into another community-based agency service. Where this occurs tools and strategies must be available to the service provider that will allow them to make necessary adjustments to services to address the reduction in funding, including access to increased funding to bridge gaps caused by vacancies.

^{xii} that appropriate investments be made to establish all of the supports that individuals and families will need to effectively use direct funding especially through flexible, as needed, evolving supports in accessible central family locations.

^{xiii} that direct funding be provided in advance and simple mechanisms for reporting on the use of funds be developed.

^{xiv} the establishment of a policy framework that reduces restrictions on the management of community services, allowing Boards of Directors and Executive Directors to manage within an established framework of principles aimed at promoting social inclusion as a primary aim.

^{xv} that the Ministry set goals for a five-year and a ten-year period and that a full review of the progress be conducted after each five year period so appropriate policy and operational adjustments can be made to the reform initiative.

^{xvi} that consideration be given to funding pilot/demonstration projects to explore the following issues:

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- Using direct funding to address the needs of people deemed to have the greatest need for support
 - Various accountability mechanisms for direct funding including mechanisms to enable larger allocations of direct funding
 - Processes for divesting of or reallocating assets currently tied up in buildings that we decide are no longer needed

And, we further recommend that funding be allocated to study good work that is already being done with respect to this area of reform here in Ontario and elsewhere with the aim of learning and duplicating promising practices.

^{xvii} that evaluation mechanisms based on principles that align with those described in this paper be implemented within Developmental Services to ensure that all policy, operational design and funding allocations contribute to a furthering of the goal of social inclusion and the reduction of supports that congregate and segregated people.

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