



Income Security Forum What We Heard Report

January 2019



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Context

Income Security Programs and services are a vital piece of the societal safety network that work together to help address the complex needs of residents. The Government of the Northwest Territories, through the Department of Education, Culture and Employment (ECE) is responsible for the delivery of five Income Security Programs. These include Income Assistance (IA), Northwest Territories (NWT) Child Benefit, Senior Citizen Supplementary Benefit, Senior Home Heating Subsidy and Student Financial Assistance.

In December 2018, the Honourable Caroline Cochrane, Minister of Education, Culture and Employment along with senior officials met with non-government organization (NGO) service providers throughout the territory as well as clients who have been or are current recipients of Income Assistance. The purpose of this meeting was to hear from front line service providers and clients about their experience, priorities and solutions for the IA program.

What is Income Assistance?

The IA program provides financial support to residents who are at least 19 years of age for expenses or basic needs such as food, accommodations, and utilities. The amount of support is based on a financial needs assessment.

The IA program encourages people to make productive choices. Those who are able to enter the workforce are required to engage in activities that will develop the skills necessary to obtain employment.

The IA program is needs-based and all applicants must demonstrate a financial need to qualify for benefits. This ensures accountability for public funds and a transparent process, which treats clients fairly and consistently.

Engagement Process

A total of 33 organizations were invited to the meeting and were asked to bring a past or present client of the IA Program. Invitations were sent by email and follow-up calls were made to each invitee to answer any questions. Leading up to the meeting, the agenda and an overview of the purpose of the meeting was sent to all 33 organizations. The overview outlined the goals of the meeting, which were to:

- Obtain input, ideas, and suggestions on potential improvements to the IA program and its delivery mechanisms from both past and present clients and service providers.
- Learn about the experiences of clients accessing services from the IA program.

The overview also outlined the four main areas for discussion at the meeting:

1. The way clients **access** the program (including the application, staff, reporting requirements, etc.);
2. The **Productive Choices** requirement;
3. The **continued eligibility** requirements (including reporting income, obtaining and keeping employment or providing all requested documents); and
4. Any **other** solutions or improvements they would like to present.

A total of 22 participants attended: 15 in Yellowknife, including three clients, and seven via video conference from Hay River, Inuvik and Tuktoyaktuk, including two clients. Video technology allowed for participants to have an interactive discussion with participants in three different locations.

There to listen and learn from the participants were key representatives from ECE including the Minister, Deputy Minister and Assistant Deputy Minister.

Engagement Method

SHARED VALUES

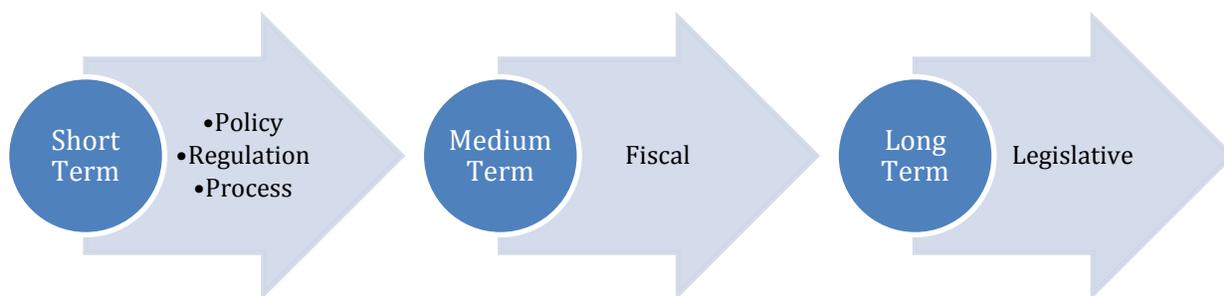
Everyone agreed on the shared values for the day's discussion: safe space, respect, confidentiality and empathy. Participants also agreed to be empathetic towards each other, particularly to those who would be sharing difficult experiences.

BRIEF CONTEXT

The Assistant Deputy Minister for ECE provided context for the day's discussion by giving a brief presentation of the suite of five Income Security programs, with a particular emphasis on the IA program.

There was also a discussion about change management and what can be achieved in the short, medium and long term.

ACHIEVING POTENTIAL CHANGE



The Minister concluded the presentation by asking participants to prioritize suggested solutions or considerations they propose to the IA program.

FORMAT

Two exercises to encourage discussion followed the presentation. The first consisted of introductions taking the form of a sharing circle. Each participant had an opportunity to introduce themselves and share their experiences with the IA program.

Following this, participants were invited to brainstorm potential improvements to the IA program and its delivery mechanisms. Participants were divided into four groups, and were asked to discuss each of the four following themes:

1. What solutions or improvements would you like to see in **accessing the program?**
2. What solutions or improvements would you like to see to the **Productive Choice requirement?**
3. What solutions or improvements would you like to see to the **Continued Eligibility requirements?**
4. What solutions or improvements would you like to see to **other areas of improvements?**

Each group was asked to record their answers onto flip-charts, which were posted around the room (including in Hay River and Inuvik). Once everyone had completed

the discussions, they were asked to choose their top five priorities from the overall list of solutions.

What We Heard – In Each Area of Discussion

ACCESSING INCOME ASSISTANCE

For the purposes of this report accessing IA means that clients know about, understand, successfully apply and benefit from the program. This includes but is not limited to accessing the application and supporting documentation, staff and receiving payment.

It was apparent from the discussions that there is a need to provide more information about program policies and ensure that clients, advocates and supporters understand them.

Application forms and documents explaining the program were a constant theme because they are complex and not easily understood.

Participants recommended that the application process be simplified and forms reviewed. All IA documentation, including the policy manual and marketing materials should be in plain language and respectful.

There were suggestions that staff could do more outreach, with NGOs and clients in their communities; staff should be allowed to meet with clients in a location where they feel safe, such as NGO offices. All seemed to agree that funds should never be withheld from a client due to a Client Service Officer (CSO) error or lack of government resources. Finally, ECE needs to ensure that staff have appropriate training when working with residents that are impacted by trauma and those with disabilities.

Top priorities identified in this area include:

“Clients need more information, in the form of workshops. Clients need to be empowered – they need to know all that is available to them so that they can make good choices.”

“A third barrier is the need to provide an ID, which is sometimes difficult for our clients.”

“It is very difficult to navigate the system.”

“Clients don’t feel understood, and feel like they are not given all the information at the beginning”

“Plain language documents should be available that lets the clients know what services they can expect, and what will be expected from them.”

- Simplify application and ongoing reporting;
- Payments should never be withheld funds due to CSO error or lack of government resources;
- Clients/workers need to understand options (provide a booklet with brief information to every client & worker);
- Staff should do outreach work to places where clients feel comfortable and safe;
- Have appointments at other locations such as NGO offices;
- Have an actual disability specialist CSO who can provide better support to clients with disabilities; and
- Use statutory declaration to vouch for ID.

PRODUCTIVE CHOICES

Productive Choices (PC) are activities that non-disabled clients between the ages of 19 and 59, accessing IA are required to participate in. PCs are activities that help a client obtain their goals of self-reliance and include:

- Employment that generates wages or a salary;
- Traditional activities including hunting, trapping and fishing;
- Education – choices may include postsecondary, ALBE or an up to Grade 12 program in an approved school;
- Career planning – there must be a career plan or action plan developed with a Career Development Officer;
- Wellness programs;
- Parenting;
- Caring for Disabled Adult dependent(s) or a dependent requiring homecare services; and
- Unpaid community work or volunteering.

The majority of participants understood and accepted this component of the IA program. However, they recommended it be more client-centered and client driven.

It was suggested that staff should ensure the client (and their family) are stable and in safe housing before being required to commit to a PC. In addition, people with disabilities should be offered PCs adapted to their abilities. More consideration should be given to artists by allowing their work to become a PC. Increased training opportunities, such as life-skills and parenting courses, were recommended.

A notable difference in regional and Yellowknife comments was that Yellowknife recommended PCs be very individualized whereas regional comments were centered on having the PCs be consistent in the number of hours clients are required to do and that the types of activities should include life skills and budgeting workshops.

Top priorities identified in this area include:

- PC requirements should be client-centered and client-driven. For example, they should focus on the stability of family, well-being, and housing;
- For a person with a disability that may not be able to work, permanently, PCs are not necessary or at least should meet their abilities;
- Life-skills workshops should be offered continuously in all communities as PCs and could include topics such as money management and, making healthy food choices when grocery shopping.

“Productive Choice option has a narrow focus – it needs to be expanded. For example, traditional activities exclude everything from my own culture.”

“People in my community really like the Productive Choice requirement, but there are not enough real northern choices. Popular choices are harvesting fish, and chopping wood for the community.”

“There are no options in the Production Choice requirement to help artists. Artists on IA are required to work, which delays the completion of their art; it can take up to a year to produce one work of art.”

“They need options to keep busy – shoveling snow or cutting wood, volunteering. There should be workshops on IA held in the communities for clients.”

CONTINUED ELIGIBILITY

For the purposes of this report, continued eligibility includes the requirements for remaining eligible for IA. This includes monthly required paperwork, the obligation to follow through on PCs and other program requirements, and reporting income.

There was a clear message that the program is difficult to navigate and that clients and NGOs alike do not always know the expectations or fully understand them.

Participants also expressed concern regarding the penalties associated with not following through on requirements of the program.

According to participants, continued eligibility for IA should be based on housing, food and basic necessities and not on the client's capacity to follow their PC plan.

It was suggested that the IA program could also offer clients quarterly reporting or a regular payment schedule. Additionally it was recognized that clients need and want to understand their options and rights and that staff should use plain, respectful, language when communicating about the expectations for IA eligibility. Clients should be provided simple information on dispute resolution and how to seek the help of an advocate.

Top priorities identified in this area include:

- Clients need to understand their options;
- Provide as much information to clients as possible through information sessions and handbooks;
- Ensure clients know they can ask for an advocate;
- Eligibility should first be determined by the need for housing, food, and necessities and then on PC requirements;
- Eligibility should never create homelessness;

"There's a lot of paperwork and stress on workers; the system is extremely slow."

"If IA is late or fails to pay a client's bill, the policy is to not pay arrears, so it comes out of client's food budget."

"His Productive Choice option should have been to get well, because he wasn't employable. Unfortunately, the PC assigned to him was employment, which didn't work because of his health so now he is homeless and not eligible for the program."

"NGOs are filling the gap financially with clients waiting for late IA payments and they can't afford it."

"Unfortunately, the father was not meeting his Program requirements for eligibility and the IA support was cut off. The mother was meeting all her requirements, but because the father was not, they were no longer eligible for ECE assistance. Our NGO had to step in to support the mother and her baby."

- Base income eligibility on individual income rather than household income (not all members of household have access to each other's income);
- Transition to quarterly reporting and a payroll system for all who want or need it; and
- Improve timeliness of payments.

OTHER AREAS

Participants were invited to provide additional suggestions and solutions that were not covered in the previous topics. This was an opportunity for participants to share any additional ideas they may have on Income Security Programs and the role of ECE.

Participants recommended the establishment of an IA steering committee, an increase to the number of meetings between NGOs and senior IA staff and more partnerships between front line workers and NGOs. They also reiterated the importance of having plain language information available for clients in a variety of formats including workshops.

Participants discussed increasing benefits to include provisions for basic phone, internet, and laundry, as well as prescription drugs, vision, dental, pregnancy and nutritional supplements.

Top priorities identified in this area include:

- A minimum of two meetings per year between NGOs and senior IA staff;
- Establish an IA steering committee;
- Organize a regional forum to address and resolve issues;
- More partnerships between front line workers and NGOs so they know how the IA program works;
- Share information with clients about NGO programs and services;
- Transparent accountability by program staff. For example, when a mistake is made (i.e. rent sent to wrong landlord) ECE should fix the mistake and not expect NGOs or landlords to cover it;
- Stop losing paper and electronic documents; and
- Pilot basic guaranteed income in one NWT community with greatest need.

What We Read

Participants were also invited to submit additional materials and a total of 7 written submissions were received.

The written submissions affirmed what was said at the meeting and provided additional feedback which is captured below:

- The amounts paid to clients should be indexed to the Consumer Price Index to meet the higher cost of living;
- The earned monthly exemption of \$200 for single applicants and \$400 for families has not been raised since 2007. With a higher cost of living, this amount is worth less than it was before;
- The unearned yearly income allowed should be doubled, at least;
- Re-write the IA Policy Manual to reflect a more respectful approach. According to this person, the present manual presents a restrictive and judgmental approach and the GNWT should *'help its clients move out of poverty and not keep them unable to do so'*;
- Create check lists that staff must use with a potential client. Paper work must be in plain language and use as many visual aids as possible with less words and more pictures;
- That monthly statements should be simplified;
- Staff should make a photocopy of documents that clients drop off – this would help greatly if things are lost at the IA office; and
- Case management processes need to be reviewed to ensure bottom-up flow.

Conclusion

Overall 27 priority solutions were identified. These priorities may be themed in the following manner:

- **Client centered** – the program and its delivery must be client-centered. The requirements of the program have to be balanced with the stability of family and home;
- **Building Partnerships** – more interactions from ECE staff at all levels with community partners are needed;

- **Communications** – plain language positive documents that explain the program are needed ;
- **Process issues** – the requirements of the IA program are complex and should be streamlined and simplified. Lost paperwork and late payment issues should be resolved. To reduce staff and client time, different reporting periods should be considered;
- **Benefit levels** – the benefits and benefit levels available under the IA program should be reviewed;
- **Education for staff**– standard training should be available for ECE staff and should include Trauma Informed Training and Disability Sensitivity Training; and
- **Education for clients** – there should be workshops available for clients.

THANK YOU

The Minister and Department staff would like to express their gratitude and appreciation to those who have contributed their suggestions. What we heard will inform and guide the department in considering changes and improvements to the IA program so that it continues to meet the needs of NWT residents.

APPENDIX 1: DETAILED SOLUTION LIST

The following is a listing of all the suggestions that were displayed on flip charts following the brainstorming session in each of the areas of discussion. Note that these are in no particular order.

Accessing the program

Yellowknife

- ◆ Have appointments at other locations such as NGO offices;
- ◆ Statutory declaration to vouch for ID;
- ◆ Simplify application and ongoing reporting – never withhold funds due to CSO error or lack of government resources;
- ◆ Thoroughly understand the Program – client & staff;
- ◆ Remove barriers (physical) at offices such as the plexiglass;
- ◆ Have actual disability specialist CSO who understands how to support clients with disabilities;
- ◆ Carefully consider locations of services -keep social services separate from other services;
- ◆ Offer anti-discrimination training;
- ◆ Fund a service Navigator – partner this with an NGO so it’s at arm’s length;
- ◆ Educate workers as to all aspects of the Program – consistency of application;
- ◆ Forms should be easy to read – plain language;
- ◆ Need to know deadlines;
- ◆ Read clients a plain language version of client services standards at start of each meeting;
- ◆ Partner with NGOs for client accessibility issues;
- ◆ Address issues of confidentiality – both perceived and actual;
- ◆ Trauma-informed training for all workers;
- ◆ CSOs need to be there when an appointment is booked with a client;
- ◆ Clients need to know what the essential documentation required is if they don’t have an ID; they should be given a grace period to collect these documents;
- ◆ Client-centred appointments;
- ◆ More chairs in waiting area and sufficient time for appointment;
- ◆ Totally overhaul application;
- ◆ Improve timeliness of payments and establish a set schedule of payments;

- ◆ Create an Ombudsman position – non-government;
- ◆ Align housing benefits (i.e., market rent with requirements set out by social services i.e. mom/parent with two children must have a two bedroom apartment);
- ◆ Remove financial search from first assessment/month – remove limits from rental to reflect what landlord is asking for – CSO has to have authority to approve rent without going to director – change policy to reflect policy limits – housing limits;
- ◆ Housing approval process needs to change – government process too lengthy;
- ◆ Hidden expenses not taken into consideration (i.e., transportation, communication);
- ◆ Include phone/Internet in eligible expenses;
- ◆ Automatic eligibility for extended health with disability support;
- ◆ Maintain access to coverage of health - even if no income required;
- ◆ Access to assessment of disability i.e. wait times does not make people ineligible for disability benefit;
- ◆ Reduce the amount of details required for annual reporting for those with a permanent disability or even get rid of requirement to confirm disability annually for permanent disability;
- ◆ If on disability, should be paid on time, regardless of common-law status;
- ◆ Benefits should be by person and not penalized by something their partner did;
- ◆ Provide in whatever form necessary the assistance required to complete forms in a timely manner;
- ◆ Remove barriers and/or create interim acceptable methods to access funding i.e. no ID – having someone vouch for them;
- ◆ Ensure people are assisted in getting a bank account for direct deposit – stops delays from mail;
- ◆ Lower age: recognize teens need to access IA.

Regional

- ◆ Have staff do more outreach (working with NGOs) because people do not feel comfortable going to the office;
- ◆ Lower age to 18;
- ◆ Help people living in shelters' to access resources (i.e., when people lose or can't access their ID);

- ◆ Allow for temporary ID to be used while people running from abusive situations can get their ID replaced – statutory declaration;
- ◆ Ensure clients know they can ask for an advocate;
- ◆ Clients need to know what the dispute resolution process is - what is the informal and formal process they can follow if there is a disagreement;
- ◆ Clients should receive a confirmation their information has been received with a chronological listing;
- ◆ Clients would like the option to have their meetings recorded;
- ◆ Remove plexiglass– causes problems;
- ◆ Remove or address renovations causing problems;
- ◆ Ensure there are enough workers in IA office to reduce stress;
- ◆ Clients/workers need to understand options (booklet with brief basics available to every client & worker);
- ◆ Staff should do outreach work to centres where clients feel comfortable and safe;
- ◆ Shelters used by clients should be registered with social assistance - help clients access resources;
- ◆ Need to address age limitations to access the Program;
- ◆ Add a dispute resolution section in the information booklet - what are the options for clients having problems with a worker; how to access advocacy;
- ◆ Clients should receive a confirmation that their information has been received, with a chronological listing;
- ◆ Anybody using shelter still allowed to access income support;
- ◆ Program should cover cost of ID replacement for people running from abusive situations;
- ◆ References and guidelines available to clients;
- ◆ Should have a form from ECE/shelter to be brought to Income support to verify it is them to receive benefit as an acceptable form of ID;
- ◆ Should have a policy for artists; requirements should be included in booklet.

Productive Choice (PCs) requirements

Yellowknife

- ◆ PCs needs to be client-centred and client driven i.e. stabilization of family & self & housing;
- ◆ For a person with a disability that may not be able to work, permanently, PCs are not necessary or at least should be to their abilities;

- ◆ Ensure CSOs are consistent with how PCs are acceptable/applied and hours considered;
- ◆ Offering clear explanation of choices and what is acceptable;
- ◆ Remove PC altogether;
- ◆ Client action plan is determined by client with support letter of NGO;
- ◆ Have an ability to make exceptions in individual cases in a timely manner;
- ◆ Create incentives to eventually get off IA;
- ◆ Suggest community service hours to repay debts;
- ◆ Transition period – clients need support, their food, rent money while moving to/in-between jobs, i.e. casual jobs;
- ◆ Less punitive, more productive;
- ◆ Do not attach housing to PCs – should not lose housing because one PC was not completed, this affects children;
- ◆ Remove requirement to meet with career officer if PC is not employment or career planning;
- ◆ Implement client chosen Productive Choices.

Regional

- ◆ Include artistic endeavours (length of time; grants should be broken down to calculate allocation for materials and honorariums; 50% income new equipment);
- ◆ Life skills workshops should be offered (i.e. budgeting and shopping);
- ◆ Help young parents with parenting skills;
- ◆ Provide information on counselling opportunities;
- ◆ Staff should have the ability to deliver the Program to elders in their homes (senior home/transition home); this would help with elders who have mobility issues;
- ◆ More clarity around short term and long term disabilities;
- ◆ More assistance to people with disabilities;
- ◆ Should have more opportunities in traditional activities – such as community harvesting;
- ◆ Encourage more partnerships between front-line workers and NGOs so that NGOs know how the Program works;
- ◆ Meetings between CSOs and clients should be recorded;
- ◆ Arrears should be addressed by CSO and client;

- ◆ Artists should be included in Productive Choice (their grants should be considered – and the fact that 50% goes to materials; they should be allowed to keep the rest for a next project).

Continued Eligibility requirements

Yellowknife

- ◆ Eligibility should first be determined based on housing, food, and necessities and then on Productive Choice requirements;
- ◆ Transition to quarterly reporting & payroll type of system for all who want or need it;
- ◆ Base income eligibility on individual income rather than household income (not all members of household have access to each other's income);
- ◆ Cancellation must be in writing and provide rationale;
- ◆ Eligibility should never create homelessness;
- ◆ Housing First, children well-being to be considered, is a priority before cut-offs – is not a decision by caseworkers alone – should go to Program director;
- ◆ Remove the need to be on the Yellowknife Housing list – can take a long time to get on the list – also, not an easy application process;
- ◆ If one of a couple goes to jail, or there is a change in family status, there must be a transition process that recognizes the time it can take for individuals to find other financial options;
- ◆ During transition periods (i.e. youth to adult and adult to senior) meet with clients to discuss upcoming changes;
- ◆ Eligibility cannot be cancelled based on one CSO's decision;
- ◆ The right-hand needs to talk to the left-hand in government;
- ◆ Assess adults in family separately so children are not affected;
- ◆ Income tax & GST should not be clawed back;
- ◆ Don't ask for back-up document if client receives a gift particularly if that gift is within the monthly allowable revenue;
- ◆ If ECE loses the paperwork, ECE should pay the arrears on rent, utilities, etc.;
- ◆ Replace punitive 60 days ineligibility with a positive conversation/education session on how eligibility works;
- ◆ Progressive reductions in earnings cap once steady employment is found to incentivize it;
- ◆ Those in late pregnancy should be supported to be in a home which is the right size for the baby as well;

- ◆ Government could access NOA/GST direct (CRA online direct); GST is redundant because it is on NOA;
- ◆ Accept other tax summaries (official) besides NOA;
- ◆ People should not have to lose everything before they are eligible; they should be allowed to maintain a certain level of assets;
- ◆ Support must equal living wage (thresholds increase for persons with disabilities).

Regional

- ◆ Pay rolling – clients are fully informed of what this means, in writing, in plain language;
- ◆ Help clients manage their arrears (i.e., small monthly payments);
- ◆ Consider the implications of arrears, for example power versus rent; there's been a significant increase in power costs;
- ◆ Lower eligibility to 18 years of age;
- ◆ Clients need to be fully informed, plain language; explain timeframe when you're not eligible;
- ◆ Clients should be encouraged to ensure children go to school and accountable (incentive based on attendance);
- ◆ If pursuing seasonal employment IA should pick-up again without redoing paperwork;
- ◆ United Nations declares that we cannot break cycle of poverty without education;
- ◆ Clients need to be fully informed of what Continued Eligibility means in plain, written, language;
- ◆ Clients need to understand their options;
- ◆ A brief booklet with the basics and clients' options should be available to every client and worker;
- ◆ This booklet should also include simple information on dispute resolution, seeking an advocate, confirmation of information received, etc.;
- ◆ Anybody accessing a shelter should be allowed to access income support;
- ◆ Replacement of ID should be covered by income support;
- ◆ Provide as much information to clients as possible through information sessions and handbook.

Other areas of improvement

Yellowknife

- ◆ Meeting twice annually a minimum between NGOs and senior IA staff;
- ◆ Establish an IA steering committee;
- ◆ Informed workshops for clients – some are not aware of their eligibility;
- ◆ Organize a regional forum to address and resolve issues;
- ◆ Transparent accountability (when a mistake is made ECE should fix, not expect NGOs or landlords to);
- ◆ Better organization and processes regarding paper and electronic documents that are submitted;
- ◆ Living wage equivalence geared to the consumer index with annual review and adjustment;
- ◆ Need transparency of administration and implementation costs;
- ◆ Pilot basic guaranteed income in one NWT community with greatest need;
- ◆ Analyze alternative income to help determine service gaps rather than a punitive claw-back;
- ◆ Add basic phone costs and laundry;
- ◆ Review and revise amounts annually based on CPI;
- ◆ Do a cost - benefit analysis of time spent by CSOs reviewing monthly paperwork versus the money saved by that review;
- ◆ Honour the commitments in the hand-out (i.e., 48 hours to return calls);
- ◆ If CSO goes on vacation, make sure there is coverage (continuity of care);
- ◆ Reduce the reporting requirements and make more people pay rolled;
- ◆ Treat everyone with respect;
- ◆ Continue to have a CSO assigned to NGOs;
- ◆ Make sure clients have the right information from the start;
- ◆ Make sure staff have and understand Non-violent Crisis Intervention training;
- ◆ Be client-centred in everything;
- ◆ Fix and simplify computer system so staff can use it;
- ◆ Establish an Ombudswoman position for the program;
- ◆ Mandatory coverage of prescription, dental, vision, and medical supplies;
- ◆ Pregnancy & nutritional allowance;
- ◆ Extended health benefits for persons with disabilities;
- ◆ Research best practices for breaking the poverty cycle;
- ◆ Government rebates should not be eligible as income source;
- ◆ Financial literacy should be mandatory;

- ◆ Clarify overlap in situations where senior parent lives with adult, or a child with a disability;
- ◆ Clarify process for getting market rent for singles;
- ◆ Streamline intergovernmental processes (i.e., child support, IA, housing);
- ◆ Remove auto-deductions on overpayments;
- ◆ Clarify accounting for damage deposit;
- ◆ Pay for emergency basic phone, insurance, and Internet;
- ◆ Trauma-informed practices should be reflected in the policies;
- ◆ WSCC rights of the worker need to be included in IA orientations.

Regional

- ◆ Provide as much information to clients as possible (i.e., hand-book, sessions);
- ◆ Increased case management correct information;
- ◆ Share information with clients about NGOs' programs and services;
- ◆ More partnerships between front line workers and NGOs so they know how it works;
- ◆ Pay vendors directly (clients could choose which stores);
- ◆ Educate other organizations, not just NGOs to what ECE does; ECE could attend AGMs;
- ◆ Record meetings between CSO and clients – good for the safety of both;
- ◆ Arrears addressed as a two pronged system – clients at fault or workers at fault;
- ◆ A men's shelter is required.