



First Nations Policy  
Recommendations  
for Indigenous Services  
Canada's On-Reserve Income  
Assistance Program Reform

*From Surviving to Thriving*

**FINAL REPORT**

January 2023



# First Nations Policy Recommendations for Indigenous Services Canada's On-Reserve Income Assistance Program Reform

*From Surviving to Thriving*

JANUARY 2023

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# First Nations Policy Recommendations for Indigenous Services Canada's On-Reserve Income Assistance Program Reform

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## Executive Summary

Indigenous Services Canada's (ISC) On-reserve Income Assistance (IA) Program was established by the Government of Canada in 1964 to assist First Nations on-reserve cover basic needs. Since its inception, there have been no significant reforms aside from a shift in the policy authority to align with provincial and territorial income assistance rates and eligibility. As a result of the program's shortfalls and the lack of meaningful engagement with First Nations to date, the Federal government sought to understand how to make the program more responsive to the needs of First Nation clients and to identify the supports required to help clients better transition from income assistance to employment and education through their 2018 Budget investment of \$8.5 million over two years. The Assembly of First Nations (AFN), the Technical Working Group on Social Development (TWGSD) and ISC have been collaborating to support reform of the IA Program through an evidence-based bottom-up approach that leverages First Nations-led engagement and research, regional perspectives, and INDsight Consulting's data and service gap analysis.

This document provides key areas for reform of the IA Program that have been prioritized by First Nations. The TWGSD developed policy recommendations to address shortfalls within the program that were validated by First Nations-in-Assembly via AFN Resolution 07/2022, *Reform of the On-Reserve Income Assistance Program*. The recommendations include implementing a needs-based, livable income for clients, enhancing investments in case management and pre-employment supports, implementing community-based, culturally-informed holistic supports for well-being, and empowering First Nations self-determination and self-governance.

## Policy Recommendations for Program Reform

Reform of the IA Program requires a phased approach that supports First Nations determination over implementation according to their own readiness and pace. The TWGSD has developed several policy recommendations, paired with immediate and long-term measures that the Government of Canada can take to address priorities for reform, as identified by First Nations, including:

1. Shifting the IA Program towards a needs-based funding approach that is flexible and culturally appropriate to account for the unique contexts, priorities and needs of First Nations, as well as recognizing First Nations determination and jurisdiction over the IA Program. Administration and delivery of the program requires flexibility for First Nations to determine culturally appropriate approaches while also accounting for higher costs of living on-reserve, transportation, energy, reliable childcare, and support for mental health and well-being.

**Immediate Actions:** Canada must increase IA rates to provide a livable income that is responsive to First Nations realities. Canada must take immediate steps to amend the policy authority away from being tied to provincial and territorial rates and towards needs-based funding and rates.



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- ✓ **Long-term Actions:** Canada must work with First Nations to implement policy changes towards First Nations control and determination over the IA Program, including support training, development and governance initiatives towards the transfer of jurisdiction of the IA Program to First Nations as desired.
- 2. Universal access to case management and pre-employment supports, including enhancing First Nations capacity to support increased services to assist IA clients to transition to education, employment, and further independence. Enhancing First Nations capacity includes meaningful investments in the First Nations workforce, ensure industry standard wage comparability for case managers and administrative services, increase office space and supplies, access to client rooms that are accessible, and opportunities for consistent specialized training and networking.
  - ✓ **Immediate Actions:** Canada must make investments in the IA Program to increase IA administrator salaries to reflect industry standards, keep pace with inflation and the higher cost of living on-reserve, ensure access to safe and accessible work environments, and provide training, networking and professional development opportunities.
  - ✓ **Long-term Actions:** Canada must work with First Nations to continue to address administration priorities and barriers through long-term, sustainable investments and flexibility. Canada must make meaningful investments in the First Nations workforce and work with First Nations to increase economic opportunities.
- 3. Investments in comprehensive community-based and culturally informed wrap-around programming and services that support IA clients through early support and prevention, youth specific strategies, life skills development and other community level prioritized services, to support client well-being and independence, complimentary to financial supports administered under the IA Program.
  - ✓ **Immediate Actions:** Canada must make immediate investments for First Nations to define, design and work towards implementation of holistic, wrap-around programming for IA clients.
  - ✓ **Long-term Actions:** Canada must work with First Nations to embed cultural and traditional knowledge in the IA Program. Canada must increase access to holistic wrap-around services, such as disability programs, childcare, etc.
- 4. Addressing barriers for IA clients and their families, including supporting increased and additional health care access and coverage, reliable childcare and caretaker allowances, enhanced case management supports to navigate supportive services and programs, and higher cost of living allowances to account for special needs and dietary restrictions. First Nations worldviews and priorities for supporting community members with disabilities is required to ensure First Nations with special gifts live with dignity.



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- ✓ **Immediate Actions:** Canada must adopt a First Nations definition of disability within the IA Program that is reflective of First Nations perceptions of disability and well-being. In collaboration with First Nations governments and organizations, First Nations with disabilities and caregivers, Canada must ensure that IA rates are reflective of the needs of First Nations with disabilities and caregivers.
  - ✓ **Long-term Actions:** Canada must work with First Nations to ensure that First Nations worldviews and perceptions of disability are embedded in the IA Program. Canada must collaborate with First Nations and other government departments to ensure that First Nations with disabilities are supported to thrive.
5. A robust First Nations developed data strategy that prioritizes First Nation data collection needs and ensures First Nation control over data, including increased capacity and resources for First Nations to attain data sovereignty.
- ✓ **Immediate Actions:** Canada must make substantial investments to enable First Nations to develop a comprehensive data strategy, including capacity building within First Nations for data collection, analysis, reporting and storage. Canada must work with First Nations to amend reporting requirements for the IA Program to ensure that data collection, reporting and results reflect a First Nations-determined data story.
  - ✓ **Long-term Actions:** Canada must provide long-term, sustainable investments that enable First Nations to continue to collect, monitor, evaluate and report on data, and respond to evolving data and research needs.

## Guiding Principles for IA Program Reform

Reform of the IA Program requires a human rights approach that upholds treaty rights and enhances First Nations rights, including those outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UN Declaration), the UN Declaration articulates the universal rights of Indigenous peoples and establishes a framework for these rights to be upheld.<sup>1</sup> Canada is obligated to fully implement the UN Declaration through the *United Nations Declaration on the Rights of Indigenous Peoples Act* (UN Declaration Act). The purpose of the Act is to establish a framework to advance federal implementation of the UN Declaration and affirm the Declaration as a universal international human rights instrument with application in Canadian law. Under the UN Declaration Act, Canada must work with First Nations and other Indigenous peoples to align its laws and policies with the UN Declaration to ensure that the rights affirmed in the UN Declaration are implemented and upheld. The federal commitment to implement the UN Declaration is imperative to ensure that

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<sup>1</sup> [UN General Assembly, United Nations Declaration on the Rights of Indigenous Peoples: resolution / adopted by the General Assembly, 2 October 2007, A/RES/61/295.](#)



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all policies, programs and services, including IA reform, respect First Nations rights as affirmed in the UN Declaration. Pursuant to the UN Declaration Act, IA reform must uphold and advance fundamental rights of First Nations affirmed in the UN Declaration, including:

**Article 5:** Indigenous peoples have the right to maintain and strengthen their distinct political, legal, economic, social and cultural institutions, while retaining their right to participate fully, if they so choose, in the political, economic, social and cultural life of the state.

**Article 20:** Indigenous peoples have the right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development and engage freely in all their traditional and other economic activities.

**Article 22(1):** Particular attention shall be paid to the rights and special needs of indigenous elders, women, youth, children, and persons with disabilities in the implementation of this Declaration.

**Article 22(2):** States shall take measures, in conjunction with indigenous peoples, to ensure that indigenous women and children enjoy the full protection and guarantees against all forms of violence and discrimination.

In addition to the UN Declaration, several national and international human rights instruments are foundational to reform of the IA Program, including the United Nations Convention on the Rights of Persons with Disabilities<sup>2</sup>, the Canadian Charter of Rights and Freedoms<sup>3</sup>, and the Canadian Human Rights Act<sup>4</sup>. The United Nations Convention on the Rights of Persons with Disabilities affirms that individuals with disabilities must enjoy the same fundamental rights and freedoms as others.

In reference to participation in the labour market and social services, this Convention states:

**Article 27:** States Parties shall recognize the rights of persons with disabilities to work on an equal basis with others by work chosen freely or accepted in a labour market and work environment that is open, inclusive and accessible.

**Article 28(2):** States Parties recognize the right of persons with disabilities to social protection and to the enjoyment of that right without discrimination on the basis of disability, and shall take appropriate steps to safeguard and promote the realization of this right, including measures:

... (c) To ensure access by persons with disabilities and their families living in situations of poverty to assistance from the State with disability-related expenses, including adequate training, counselling, financial assistance and respite care.

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<sup>2</sup> United Nations Convention on the Rights of Persons with Disabilities. (2016). [Convention on the Rights of Persons with Disabilities \(un.org\)](https://www.un.org/disabilities/convention/convention_full.asp).

<sup>3</sup> The Canadian Charter of Rights and Freedoms. (1982). [charter-poster.pdf \(justice.gc.ca\)](https://www.justice.gc.ca/eng/charter-poster.pdf)

<sup>4</sup> The Canadian Human Rights Act. (1985). [H-6.pdf \(justice.gc.ca\)](https://www.justice.gc.ca/eng/h-6.pdf)



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The Canadian Charter of Rights and Freedoms articulates the basic rights that all people living in the country now known as Canada enjoy freely, including that:

**Section 15:** Every individual is equal before and under the law and has the right to equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.

The Canadian Human Rights Act (CHRA) prohibits discrimination against individuals on protected grounds, such as race, ethnicity, sex or disability. The CHRA outlines the right to equality for matters under federal jurisdiction, such as services and programs provided to First Nations. Ensuring consistency with the CHRA and non-discrimination must be a primary consideration in the reform of the IA Program.

First Nations-in-Assembly have passed several resolutions regarding reform of the IA Program, including:

- AFN Resolution 108/2017, *Case Management Services for Income Assistance Recipients*, which called for the extension of funding for case management services and enhance and expand the Ontario Works program.
- AFN Resolution 28/2018, *Support for the establishment of a Technical Working Group on Social Development*, mandating the creation of a technical working group to oversee and advise on policy and operational changes to ISC's social development programs, including the IA and Assisted Living (AL) Programs.
- AFN Resolution 89/2019, *Continuing First Nations Income Assistance Program Reform*, which called for investments in the IA Program and to pursue a study to identify data and service gaps under the IA Program.
- AFN Resolution 07/2022, *Reform of the On-Reserve Income Assistance Program*, which offers validation and support to the reform of the IA Program through First Nation-led policy recommendations.

Additionally, in her 2021 federal election priorities document, *Healing Path Forward*<sup>5</sup>, AFN National Chief RoseAnne Archibald called on the federal parties to commit to working with First Nations on IA Program reform, including improving rates and expanding pre-employment supports, as well as exploring options for a First Nations guaranteed basic income.

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<sup>5</sup> Assembly of First Nations. (2021). [Healing Path Forward: 2021 Federal Priorities for Strengthening and Rebuilding First Nations, A Commitment to Nation Building](#).



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## Overview of Reform of the On-Reserve Income Assistance Program

The IA Program was established by the Government of Canada in 1964 to assist First Nations living on-reserve cover their basic needs. The program has remained relatively stagnant aside from the 2013 implementation of case management and pre-employment supports to assist individuals to navigate the workforce. Program shortfalls resulted in the AFN advocating for reform of the IA Program because First Nations living on-reserve experience unique socioeconomic realities and face higher costs of living than urban residents, including higher costs of accessing goods/services, medical care, transportation, or special needs for individuals with disabilities (e.g., personal incidents, doctor recommended diets, accessibility modifications, etc.).

First Nations have also underscored that the program does not currently ensure equitable access to supports and services such as case management, training opportunities and pre-employment supports that are intended to support First Nations transitioning into employment and/or education. Recognizing the program's shortfalls and need for meaningful engagement with First Nations, Budget 2018 committed \$8.5 million over two years to work with First Nations to understand how to enhance the program to be responsive to their needs. ISC's recent evaluation found that the IA Program had achieved the 2006 goal of aligning with provincial and territorial rates; however, the report noted this would only be a worthwhile goal if there was historical, cultural, social, and labour market parity across individuals on- and off-reserve. First Nations living on-reserve face substantial systemic barriers such as remoteness, lack of economic opportunities, poor infrastructure, and minimal social supports compared to those living off-reserve<sup>6</sup>, which impose unique challenges that must be accounted for in the provision of the IA Program.

## 2018 Engagement and Themes Identified for Program Reform

ISC's 2018 First Nations-led engagement sought input from First Nations IA clients, First Nations IA administrators, and First Nations leaders on program reform. The sessions included secondary engagement activities such as online surveys, testimonials from former clients and workers, as well as youth outreach. During the engagement, participants indicated that the legacy of colonialism and intergenerational trauma are substantial barriers to changing outcomes for First Nations, and the way to promote a shift from surviving to thriving is through First Nations-determination. Participants expressed that the *Indian Act* and patriarchal government policies hinder First Nations outcomes by forcing a cycle of dependency that they cannot escape from. Participants conveyed concern that government interference and imposition of legislation that was not co-developed with First Nations negatively impacts them, and that to move forward First Nations must be provided greater flexibility and local control over the design and implementation of policies that pertain to them. Some First Nations participants recommended that flexible legislation be enacted to empower First Nations to design and implement their own IA Programs. First Nations detailed that through

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<sup>6</sup> [Evaluation of the On-Reserve Income Assistance Program. \(2018\). Indigenous Services Canada.](#)





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flexible legislation, income assistance policies can be transformed to become a funding mechanism that addresses specific gaps in the standard of living First Nations face.

Following the 2018 engagement, ISC developed a summary report highlighting several overarching themes for reform that were validated by the TWGSD, including:

## 1. Increasing Income Assistance Rates

First Nations have stated the current IA rates are insufficient to cover the costs of food, shelter, personal items, and transportation. IA rates must be determined based on the needs of clients and their actual cost of living rather than being tied to provincial or territorial rates, as First Nations living on-reserve do not have the same cost of living rates as individuals residing in urban centers. Participants indicated that IA Program rates should be reflective of First Nations socioeconomic realities, including labour market access, the local economic context, remoteness, resource availability, and costs of essentials such as food, fuel, clothing, and personal items. Furthermore, the 2018 engagement identified additional considerations to be built into base rates to account for unique circumstances of residing on-reserve, such as the cost of utilities, overcrowded housing, and food insecurity.

## 2. Capacity Building, Increased Access to Job Materials and Staffing Needs

Participants highlighted key administration shortfalls related to the delivery of the IA Program, including access to office capital such as printers, photocopiers, computers, and software, as well as a lack of training and development opportunities for First Nations staff. IA Program staff are often overworked and underpaid when compared to a similarly staffed position in provincial and/or territorial governments, which results in challenges with staff retention and burnout. Program administrators often face barriers to managing their untenably high caseloads which ultimately causes hardship to IA clients. Participants called for increased funding to address these gaps and to support administrators to improve outcomes for clients.

## 3. Case Management and Pre-Employment Supports

Participants raised concerns with the lack of case management services available in most First Nations, despite being proven to improve client outcomes<sup>7</sup>. Case management services are critical in assisting First Nations IA clients to navigate the work force and attain access to other valuable resources and support programs. If properly resourced, case management services support a coordinated approach for smooth transitions through different programs and foster greater client independence. Universal expansion of case management services is important to increase effectiveness of programs and services that are available within First Nations.

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<sup>7</sup> Indigenous Services Canada. (2018). [Evaluation of the On-Reserve Income Assistance Program](#).



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## 4. Community Based Wrap-Around Supports

Participants also identified the importance of wrap-around services and supports to create a circle of care that supports First Nations to implement the program in a culturally relevant and holistic manner. Participants emphasized that supports should be flexible, barrier-free and designed in a way that will nurture an individual and community social safety net to address key barriers to employment and education that prevent clients from meeting their essential needs.

Wrap-around supports are seen as a key factor to reduce the gaps in services that the current IA Program has been unable to address. For example, childcare is a key component to accessing training, education, or employment opportunities; however, First Nations often have limited or no access to affordable and quality childcare and after school programs. First Nations also indicated that transportation is often underfunded or unavailable in First Nations and limits an IA client's ability to access training and employment opportunities. Some clients may need to leave their First Nation for training; however, the cost of transportation is not accounted for in the current program, creating a significant barrier for those living on-reserve, and in particular for those living in remote communities.

First Nations also identified that in order to establish healthy and thriving First Nations and families, mental wellness and substance misuse supports must be made universally available with an emphasis on breaking down systemic barriers to accessing such supports. Chronic underfunding has impeded First Nations abilities to develop impactful culturally responsive services within communities, which has perpetuated systemic barriers and contributed to negative health and social outcomes.

## 5. Self-Determination/Governance and Traditional Knowledge

First Nations are seeking greater control and determination over all programs and policies that impact their citizens and communities, which is foundational to the sustainability of reform. The IA Program has failed to be culturally responsive to the needs of First Nations that could be addressed through self-determination and inclusion of traditional knowledge into decision making and program development. Transfer of jurisdiction of the program to First Nations is seen as a key element to reforming the program, eliminating systemic barriers and creating a program that is reflective of the community specific priorities within First Nations.



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## AFN's Study on Gaps in Data and Services of the On-Reserve IA Program

Following ISC's commitment to IA Program reform in 2018, the First Nations-in-Assembly passed AFN Resolution 89/2019, *Continuing First Nations Income Assistance Program Reform*, calling for investments in the IA Program and to pursue a study to identify data and service gaps under the IA Program. In 2021, the AFN contracted INDsight Consulting, an Indigenous consulting firm to conduct a study on the service and data gaps in the IA Program. INDsight's proposes a framework for reform with an overarching goal of delivering a First Nations livable income with associated wrap-around services and supports for First Nations living on-reserve, including persons with disabilities (PWD).

The framework developed by INDsight includes a 3-tier model of service delivery that reflects an integrated '*wholistic*' culturally relevant format. The model includes prevention services, community development and utilization of performance indicators as an alternative for the current data reporting methods that aims to empower First Nations and initiate the shift from surviving to thriving. The analysis emphasizes need for the development of a needs-based funding tool for First Nations to determine funding requirements for their communities and citizens, including comparing the purchasing power of present IA rates to historic rates. The research noted the impact that political and legal frameworks have on the current program and recommended self-governing opportunities for First Nations to determine the services needed in their communities, explore legislation and opportunities to opt out of previously signed agreements, including the current IA Program, the 1965 Agreement, regional PWDA programs, or ISC's Assisted Living (AL) Program.

## Supporting First Nations with Disabilities

The 2008/10 First Nations Regional Health Survey correlated disability with low incomes, finding that First Nations living on-reserve with an annual income under \$20,000 were twice as likely to have activity limitations than those earning an annual income of \$60,000 or more. Furthermore, persons with low incomes were more likely to have severe disabilities than those with incomes of \$20,000 or more. The same survey found 28% of the on-reserve population reported a disability that limited their daily activities, in comparison to the 2012 Canadian Survey on Disability which noted that 14% of Canadian adults living off-reserve reported limitations in their daily activities.<sup>8,9</sup>

First Nations with special gifts and PWD clients experience systemic barriers and discrimination across multiple jurisdictions, programs and services, requiring a whole of government approach to build fully accessible First Nations, based on First Nation worldviews, experiences, and unique accessibility priorities. Addressing these programmatic and systemic barriers first begins with reforming the harmful eligibility criteria. The correlation of low income to increased activity limitations is important to consider within IA Program reform. The IA Program's goal is to support

<sup>8</sup> First Nations Information Governance Center. (2012). [First Nations Regional Health Survey](#)

<sup>9</sup> Statistics Canada. (2013). [Canadian Survey on Disability, 2012](#)



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individuals entering the workforce or education, failing to account for activity limitations that are more prevalent among First Nations living on-reserve. Although there is recognition from the federal government on inconsistencies within the policies and eligibility criteria for disability programs and services, the current IA Program does not currently provide funding for a disability-specific benefit to First Nations IA clients.

The AFN's analysis of the gaps within the IA Program compared funding and eligibility criteria for First Nations PWD residing off and on-reserve, emphasizing the increased access barriers, inconsistent eligibility criteria and disproportionate investments into disability programs and services for First Nations living on-reserve. These systemic gaps negatively impact First Nations persons with disabilities and their families, causing limitations to access programs and services. To address urgent funding and service gaps for disability income programming, ISC provides some regions with funding for disability income assistance/income supplements based on rates and eligibility criteria of similar programming available off-reserve. Such expansions and enhancements must be made universally available to First Nations, regardless of comparable programming in the provincial and territorial support streams and must take into account the human rights of First Nations persons with disabilities and the unique situation of the on-reserve experience for First Nations.

## COVID-19 and Impacts for First Nations

In response to the COVID-19 pandemic, the Government of Canada created the Canada Emergency Response Benefit (CERB) to provide financial support for individuals who lost their jobs due to the pandemic and incentivise individuals to stay home to control the spread of the virus. In recognition of the additional stress COVID-19 placed on First Nations and income supports like the IA Program, the federal government provided \$270.0 million to the IA Program in 2020-2021. Budget 2021 provided \$618.4 million over 2 years for the IA Program, starting in 2021-2022, to address basic needs and respond to increased program demand, including the rising cost of living, and case management supports.

The COVID-19 pandemic amplified the socioeconomic disparities faced by First Nations and highlighted the need to for a model of income assistance that is as flexible as the changing economic circumstances. The pandemic has disproportionately impacted First Nations living on-reserve, particularly those who have low income and/or are accessing income assistance. While reform of the program started prior to the pandemic, it must work to address the unique considerations that COVID-19 has raised for First Nations, in addition to the inequities, gaps and shortfalls that already existed.



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## Addressing Poverty: Guaranteed Basic Income & Social Safety Net

The CERB from the federal government during COVID-19 has sparked conversations for a Guaranteed Basic Income (GBI) as an innovative poverty reduction strategy. A GBI model guarantees that every adult receives a minimum income, regardless of work status, health, wealth, or other criteria. GBI is intended to provide enough funds to cover costs of living while also providing individuals with financial security.

To date, several countries have implemented local or regional GBI pilots including Canada (e.g., Manitoba in 1975<sup>10</sup> and Ontario in 2017<sup>11</sup>), Finland<sup>12</sup>, and Kenya<sup>13</sup>, with varying results. All the pilot projects faced different limitations, and many were deemed inconclusive. The pilots provided valuable insight into considerations for future work and the development of a successful GBI framework, including the promotion of higher educational attainment, improved well-being and health outcomes, and the ability to find and maintain meaningful employment. Further research is required to determine First Nations priorities for GBI in First Nations.

Historically and presently, First Nations continue to experience persistent and long-term poverty at alarming rates as a result of chronically underfunded programs, services, and supports; and lack access to long-term culturally appropriate wrap-around holistic programs, services, and supports. Some First Nations have begun to design their own social safety nets and includes a holistic systems-level approach that supports clients in a wrap-around circle of care model. The social safety net promotes increased quality of life and service provision, rather than solely increasing income alone. Investing in holistic services and supports through a network of social programs, helps existing services collaborate to offer a suite of supports, rather than an individual navigating multiple programs and services. For example, some social safety net models may include school lunch programs to ensure children of low-income families have access to sufficient and nutritious food or offer food banks so that families can use their income for other necessities. Programs within the social safety net focus on supporting the social determinants of health of individuals and families to increase overall well-being.

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<sup>10</sup> The University of Manitoba. (2011). [The Town with No Poverty: The Health Effects of a Canadian Guaranteed Annual Income Field Experiment.](#)

<sup>11</sup> The Government of Ontario. (2019). [Ontario Basic Income Pilot.](#)

<sup>12</sup> The Government of Finland. (2019). [The basic income experiment 2017-2018 in Finland: Preliminary Results.](#)

<sup>13</sup> GiveDirectly. (2019). [Universal Basic Income Study.](#)



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## Policy Recommendations for IA Program Reform

Throughout the engagement process, First Nations have identified key areas for reform and have proposed solutions to address critical gaps in the IA Program. Leveraging the important work First Nations have already led and the work mandated by AFN Resolution 89/2019, *Continuing Income Assistance Reform*, the TWGSD has identified a series of policy recommendations to reform the IA Program, which were validated via AFN Resolution 07/2022, *Reform of the On-Reserve Income Assistance Program*.

First Nations-determination, governance and jurisdiction are foundational to the design, implementation, and success of reform of the IA Program. First Nations have clearly identified the core priorities for program reform through various regional engagements and First Nations-led processes. Critical to the success of IA reform is addressing systemic barriers that First Nations face to ensure the reformed IA Program is responsive and flexible to the needs, realities, and priorities of First Nations.

### 1. Provision of IA Program Rates that are Reflective of First Nations Realities

Shifting the IA Program towards a needs-based funding approach that is flexible and culturally appropriate to account for the unique contexts, priorities and needs of First Nations, as well as recognizing First Nations determination and jurisdiction over the IA Program. Administration and delivery of the program requires flexibility for First Nations to determine culturally appropriate approaches while also accounting for higher costs of living on-reserve, transportation, energy, reliable childcare, and support for mental health and well-being.

- ✓ **Immediate Actions:** Canada must increase IA rates to provide a livable income that is responsive to First Nations realities. Canada must take immediate steps to amend the policy authority away from being tied to provincial and territorial rates and towards needs-based funding and rates.
- ✓ **Long-term Actions:** Canada must work with First Nations to implement policy changes towards First Nations control and determination over the IA Program, including support training, development and governance initiatives towards the transfer of jurisdiction of the IA Program administration to First Nations as desired.

### 2. Universal Access to Case Management and Pre-Employment Supports

Universal access to case management and pre-employment supports, including enhancing First Nations capacity to support increased services to assist IA clients to transition to education, employment, and further independence. Enhancing First Nations capacity includes meaningful investments in the First Nations workforce, ensure industry standard wage comparability for case managers and administrative services, increase office space and supplies, access to client rooms that are accessible, and opportunities for consistent specialized training and networking.



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- ✓ **Immediate Actions:** Canada must make investments in the IA Program to increase IA administrator salaries to reflect industry standards, keep pace with inflation and the higher cost of living on-reserve, ensure access to safe and accessible work environments, and provide training, networking and professional development opportunities.
- ✓ **Long-term Actions:** Canada must work with First Nations to continue to address administration priorities and barriers through long-term, sustainable investments and flexibility. Canada must make meaningful investments in the First Nations workforce and work with First Nations to increase economic opportunities.

### 3. Wrap-Around Supports and Shifting from Surviving to Thriving

Investments in comprehensive community-based and culturally informed wrap-around programming and services that support IA clients through early support and prevention, youth specific strategies, life skills development and other community level prioritized services, to support client well-being and independence, complimentary to financial supports administered under the IA Program.

- ✓ **Immediate Actions:** Canada must make immediate investments for First Nations to define, design and work towards implementation of holistic, wrap-around programming for IA clients.
- ✓ **Long-term Actions:** Canada must work with First Nations to embed cultural and traditional knowledge in the IA Program. Canada must increase access to holistic wrap-around services, such as disability programs, childcare, etc.

### 4. Improving Services and Supports for First Nations with Disabilities

Addressing barriers for IA clients and their families, including supporting increased and additional health care access and coverage, reliable childcare and caretaker allowances, enhanced case management supports to navigate supportive services and programs, and higher cost of living allowances to account for special needs and dietary restrictions. First Nations worldviews and priorities for supporting community members with disabilities including addressing the human rights of First Nations persons with disabilities is required to ensure First Nations with special gifts live with dignity and are supported across their lifespan.

- ✓ **Immediate Actions:** Canada must adopt a First Nations definition of disability within the IA Program that is reflective of First Nations perceptions of disability and well-being. In collaboration with First Nations governments and organizations, First Nations with disabilities and caregivers, Canada must ensure that IA rates are reflective of the needs of First Nations with disabilities and caregivers.
- ✓ **Long-term Actions:** Canada must work with First Nations to ensure that First Nations worldviews and perceptions of disability are embedded in the IA Program. Canada must collaborate with First Nations and other government departments to ensure that First Nations with disabilities are supported to thrive.



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## 5. First Nations Data Strategies to Improve Data Quality and Results

A robust First Nations developed data strategy that prioritizes First Nation data collection needs and ensures First Nation control over data, including increased capacity and resources for First Nations to attain data sovereignty.

- ✓ **Immediate Actions:** Canada must make substantial investments to enable First Nations to develop a comprehensive data strategy, including capacity building within First Nations for data collection, analysis, reporting and storage. Canada must work with First Nations to amend reporting requirements for the IA Program to ensure that data collection, reporting and results reflect a First Nations-determined data story.
- ✓ **Long-term Actions:** Canada must provide long-term, sustainable investments that enable First Nations to continue to collect, monitor, evaluate and report on data, and respond to evolving data and research needs.





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