

Canada Gazette, Part I, Volume 158, Number 26: Canada Disability Benefit Regulations

Commentary – September 23, 2024

Submitted by:
Canadian Arthritis Patient Alliance
Arthritis Society Canada

Thank you for the opportunity to provide input into the Consultation on the *Canada Disability Benefit Regulations*.

People with arthritis experience a significant amount of disability, especially episodic disability - pain, reduced quality of life with regard to social, psychological, financial wellbeing. Arthritis is a leading cause of pain and disability in North America resulting in impairments, restrictions in activities of daily living and participation in life including work. The public perception of arthritis still is that it's not serious, "*just aches and pain that everyone gets as they age*". Other diseases have support in place to help them navigate their treatment, but many people have to navigate a complex system on their own. People with arthritis experience a range of barriers in accessing disability programs federally including the Canada Pension Plan – Disability Benefit and Disability Tax Credit (DTC), accessing and getting reimbursement for prescription medications and accessing workplace accommodations needed to remain employed.

The [Canadian Arthritis Patient Alliance](#) (CAPA) is a grassroots, patient-driven and managed, independent, national education and advocacy organization that creates links between Canadians with arthritis, assists them to become more effective advocates and seeks to improve the quality of life of all people living with the disease. [Arthritis Society Canada](#) (ASC) is a national charity dedicated to extinguishing arthritis. We represent the six million Canadians living with arthritis today, and the millions more who are impacted or at risk.

Upon reading the draft regulations and reflecting on the lived experiences of people with arthritis, we offer the following feedback on key areas of the proposed *Canada Disability Benefit Regulations*:

1. **Inclusive eligibility and assessment**– The process to apply for the DTC, which will be used to provide eligibility to the new benefit, is complicated and time consuming for people with arthritis. The existing DTC application process builds on outdated assumptions about how disability is assessed, relying on all too scarce health care professionals to certify that the person is disabled. It is imperative that the DTC be reviewed and reformed towards an approach which empowers the applicant and relies on their own expertise as a disabled person. Medical professionals often sign off on these applications without understanding what it's like living with a disability

day to day. We ask that the Government work with the provinces and territories to come to a standard approach to disability assessment which can be applied to various programs. This new approach should align with the values of dignity and respect of disabled people which are embodied in the [Convention on the Rights of Persons with Disabilities \(CRPD\)](#). This new assessment approach should be co-designed and led by the government and the disability community.

2. **Increased Benefit Amount** – The benefit is not high enough and does not consider the added costs of living with disability. Many people living with inflammatory arthritis take specialty medications where the co-payments to access these drugs are not fully covered by government provided prescription drug plans and can commonly cost as much as \$2400 per year in out-of-pocket costs, which is the total amount of the Canada Disability Benefit. To be effective, the benefit amount must be much higher and lift people with disabilities out of poverty. The [Market Basket Measure \(MBM\)](#) should be used to guide monthly payment amounts of the payment and with recent increases in inflation are around \$50,000 annually. The MBM represents the basic income needed to pay for food, health care, shelter, transportation, and other costs. The benefits must be adjusted to reflect the costs of living in urban centres and address additional costs like assistive devices, medical equipment, and prescription medications.
3. **Further increases to working income** – It is encouraging to see a substantial increase in allowable working income where people can earn up to \$10,000 per year and that this amount would be excluded from calculating the Benefit Amount. We would request that this amount be further increased potentially up to \$16,200 (single person) or \$20,000 (family) similar to the provisions in [British Columbia](#) for people on government disability assistance. This amended provision would allow some people with arthritis to further participate in social and economic life, if their health situation allowed.
4. **No clawbacks of benefits** - We also know that living with a disability, like arthritis, costs more – we pay for assistive devices to live as independently as possible, housing renovations to meet accessibility needs, and pay significant amounts out of pocket for prescription and non-prescription drugs. For these reasons, the new benefit should be clawed back by provincial and private disability programs.

We appreciate seeing the ongoing work to engage the disability community in developing the *Canada Disability Benefit Regulations*. This ongoing engagement is crucial as refinements are made to the regulations and as the benefit is urgently implemented in 2025.

We thank you for the opportunity to provide our perspective on behalf of people living with arthritis. Feel free to reach out if you have any questions or wish to discuss any feedback further.

Sincerely,



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