

Increasing Social Assistance Clients' Enrolment into the Ontario Electricity Support Program

Options for The Deputy Ministers of the Ministry of
Community and Social Services (MCSS) and the
Ministry of Energy (ENE), and the Chair and Chief
Executive Officer of the Ontario Energy Board (OEB)

April X, 2017

Confidential Draft to Labour Relations
High Sensitivity

DRAFT ONLY - NOT YET APPROVED

Yellow Confidentiality:
document cannot be
shared; content can be
discussed

Purpose

- To seek decisions from the Deputy Ministers of MCSS and ENE, and the OEB Chair and Chief Executive Officer on options for increasing eligible social assistance clients' enrolment into the Ontario Electricity Support Program (OESP).

OESP Overview

- The Ontario Electricity Support Program (OESP), implemented January 1, 2016, is administered by the Ontario Energy Board (OEB) at the request of the Minister of Energy (ENE). ICF Consulting Canada Inc. is the technology services provider the OEB contracts with to process OESP applications.
- The OESP provides a monthly credit of up to \$50 on eligible low-income households' monthly electricity bill. The maximum monthly credit can be increased to \$75 for those ratepayers who have unique needs and special electricity requirements (e.g. Indigenous, people using certain medical equipment, electric heat).
 - These credit amounts will be increased by 50% and income eligibility will be enhanced as part of the Fair Hydro Plan.
- Residents whose household income falls below the level set by Statistics Canada's Low Income Measure are eligible. The eligible amount depends on the applicant's total household income and number of people in the house.
- Eligible consumers need to re-qualify every 2 years, while seniors (65+ years old) and CPP permanent disability pension recipients have an eligibility period of 5 years.
- ODSP and Ontario Works recipients, like all applicants, may apply for OESP using one of three methods:
 - Online Self-Serve Application
 - Assisted Online Application or Manual Application (both with social agency partner)
 - Self-Serve Paper Application
- Under ODSP and Ontario Works, OESP credits are exempt as income. The amount of a social assistance recipient's electricity bill prior to the application of the OESP credit is applied to the shelter allowance; hence the shelter allowance is not reduced as a result of the credit.

Current OESP Service Delivery System – Roles and Responsibilities

Organization or Delivery Partner:	Ministry of Energy	OEB	OESP Intake Agencies	Social Assistance Delivery Agents
Functions and Responsibilities:	Legislative Changes	OESP Policy and Program Development	Outreach	Outreach (e.g. office posters; ensuring SA clients know about OESP during touch points)
	Policy	Application Processing by ICF	Application Support	Inquiries by SA Clients
		Contact Centre provided by ICF	Inquiries	Referrals for SA Clients
			Calculate Applicants' Household Income	

Social Assistance Clients' Uptake of OESP

- When OESP was launched in January 2016, social assistance clients received cheque inserts about OESP and social assistance offices were provided with a memo, Qs and As, webinar training for OW/ODSP staff and an OEB digital toolkit (including brochures, backgrounders, office posters, etc.) to explain and help promote it to clients.
- Over 185,000 Ontarians have been enrolled in the program representing 33% of the total targeted low-income population and some 290,000 applications have been received.
- Based on SAMS data, there are an estimated 43,312 Ontario Works clients and 65,299 ODSP clients who receive hydro bills directly and are thereby eligible for OESP. It is not known how many of those actually applied and are enrolled into OESP.
- In recent weeks, MCSS, OEB and ENE representatives at the staff and senior management level have discussed increasing uptake of existing and potential social assistance clients into OESP.

Approach Under Discussion – Engagement to Date

- Subject-matter expertise has been gathered on the approach and versions of the options through a bi-weekly Working Group comprised of representatives from ENE, OEB, Ontario Works Branch, ODSP Branch, Social Assistance Service Delivery Branch, Legal Services Branch, and the SAMO-BTS team.
- ENE, OEB and MCSS project leads and directors have had additional ongoing conversations in order to refine the options.
- In March 2017, Members of the Ontario Works Director-Administrator Reference Group (comprised of Ontario Works municipal service managers and MCSS corporate representatives) and the Social Assistance Management Network (comprised of MCSS corporate managers and regional office representatives) were recently engaged on the broad ideas under discussion. They did not raise concerns, although we would need to return to these groups with additional details on financial/workload implications. Other feedback includes:
 - time and effort required during the stabilization of SAMS in January 2016, during the launch of OESP, diverted resources from potential efforts to support social assistance clients' OESP applications.
 - the approach needs to remain mindful of workload impacts on social assistance staff.
 - the approach should emphasize client marketing, especially digital marketing, to clients.
 - no concerns were raised with the idea of a temporary team, assuming no funding impacts and little to no impact on their staff.
- MCSS and OEB has engaged the Ontario Native Welfare Administrators' Association to gather input into a First Nations' approach.

Approach Under Discussion – Identifying Options

- Based on our analysis and engagement to date, options for increasing social assistance clients' uptake of OESP would be informed by 3 key objectives:
 - **Raising awareness** of OESP for eligible social assistance clients.
 - **Increasing the uptake** (applications to and enrolment into) of eligible social assistance clients into OESP.
 - **Automatically qualifying and enrolling** eligible social assistance clients for OESP.
- With those goals in mind ENE and MCSS developed **three** options as outlined in the following slides. Some of the options can be pursued at the same time.
- While each option will have specific considerations, there are overarching considerations which guided our approach:
 - Parts of the OESP application process that could be streamlined while acknowledging there may be new processes or infrastructures (i.e. ICE phone systems, technology equipment, accommodations) needed for a temporary team as outlined below.
 - The need to manage and mitigate negative staff workload impacts.
 - The different program eligibility criteria, application processes and service delivery structure of both OESP and social assistance.
 - For instance, while there is no appeal process for OESP eligibility decisions, there is a complaint escalation process that a temporary team (as described in options 2 and 3) would need to understand and communicate to social assistance OESP applicants.
 - The timing required for MCSS, ENE and OEB to implement operational and technological changes to reflect any policy, program, or process changes.
 - MCSS costing is reflective of a 12 months period, with a one-to-one reach-out from a temporary staff to clients, and does not include the potential multiple outreach to clients. Costs may increase if centrally staffed unit goes beyond 12 months.

Approach Under Discussion – Legal Parameters

- A key consideration is the legal requirement for the ministry to safeguard clients' personal information and to use it only for administering a social assistance benefit.
- Because OESP is not a social assistance program, options 2 and 3 below would require that either new social assistance applicants and current recipients provide additional consent to have their data shared with OEB/ICF; or that a Memorandum of Understanding (MOU) be established between MCSS and OEB.
- While a consent form signed by each client entails less legal risk than an MOU, an MOU is an acceptable vehicle for enabling client data to be shared, based on FIPPA sec. 42 where disclosure is permitted when the relevant institutions (MCSS and OEB in this case) are complying with legislation or an agreement.
 - OEB legal counsel will confirm that this approach also works with OEB's consents.
- Healthy Smiles Ontario (HSO) is not a model that can fully inform how to share client level data between MCSS and OEB because:
 - HSO simply brought an already-existing social assistance benefit (children's dental) under its integrated program; and as such,
 - MCSS already had a data sharing relationship with Accerta and MOHLTC.

Summary of Options

- **Option 1:** Raise awareness of OESP through:
 - A) communication to social assistance clients; **and**,
 - B) communications and supports to social assistance staff.
- **Option 2:** Increase social assistance clients' uptake of OESP through a SWAT team that assists clients' as needed through the online OESP application. This option also entails using a social assistance credit that is either:
 - A) aligned with the OESP credit matrix (e.g. combination of income + household size); **or**,
 - B) a new single social assistance OESP credit, outside of the OESP credit matrix
- **Option 3:** Enable a SAMS data exchange to automatically enroll social assistance clients into OESP. This option could also, if required, reflect a modified OESP program eligibility and application process modified.
- The specific start-up costs associated with each option are indicated in subsequent slides. It should be noted that social assistance delivery will entail ongoing fixed costs of \$2M in addition to the start-up costs.

Option 1 (Both 1A and 1B will be pursued, unless concerns are raised)

1A - Raise social assistance clients' awareness of OESP

2-4 month implementation

Focuses on the Raising Awareness Objective without changing MCSS or OESP programs or service delivery

- Communication outreach to current social assistance clients that pay hydro to ensure awareness of the program for those who have not yet enrolled.
- The outreach would entail communication material such as letters/mailings without social assistance or OEB/ICF field staff involvement.

Considerations and Risks:

- OEB have committed to providing communication material.
- Entails low risk of negative public or stakeholder response.
- Uses already existing resources.

Approximate MCSS Cost: \$103K. OEB may have costs that have yet to be identified

1B - Raise social assistance staff awareness of OESP

2-4 month implementation

Focuses on the Raising Awareness Objective without changing MCSS or OESP programs or service delivery

Foster social assistance staff awareness of OESP through memos, Qs and As, pathways for application, additional training on OESP for front line staff.

Considerations and Risks:

- Uses already existing resources.
- Entails low risk that social assistance staff react negatively to increased information to digest.
- Risk that this option alone may have limited impact on increasing client enrolment into OESP.

Options, continued

Options 2 and 3 require decisions and would impact service delivery and possibly program design.

Option 2A: A temporary team (SWAT team) acting as OESP intake agencies using social assistance benefit unit aligned with OESP credit matrix (e.g. combination of income and benefit unit size)

**4-6 month
implementation**

Focuses on the Increasing Uptake Objective without changing OESP programs or service delivery

- SWAT team conducts high-touch outreach/enrolment of existing and newly granted social assistance clients.
- There would be no change required to existing OESP systems, however processes would be made to social assistance service delivery.
- The team would act as an OESP intake agency.

Considerations and Risks:

- OESP and OW/ODSP eligibility are already closely aligned – ENE could make simple regulatory changes to ensure that all eligible current and new social assistance clients.
- Requires a new service delivery model (including new job specifications, MOU). Need to explore feasibility of a centralized service such as Service Ontario.
- Requires significant financial and staffing resources.
- Entails some management of labour relations issues (e.g. the appearance that some aspects of social assistance staff duties are being granted to temporary staff).
- Social assistance staff supported by a change management framework (e.g. communication material, business processes).
- Reduces or eliminates workload impacts/increases to current social assistance staff.
- Reduces or eliminates timing dependencies on OEB to change their policies, programs, systems or operational structures. MCSS can leverage existing supports from OEB for business process and training.
- Concerns may be raised by existing providers around duplication of services and reduced funding.
- ONWAA would continue to provide services for First Nations communities.

Approximate MCSS Cost: \$5.1M. OEB may have costs that have yet to be identified.

Options, continued

Option 2B: SWAT Team acts as OESP intake agency using new single social assistance OESP credit, outside of OESP credit matrix

Over 9-month implementation

Focus on Increasing Uptake and Automatic Qualification Objectives that entails changing MCSS service delivery and the OESP program

- SWAT team to complete application process using a modified eligibility category that would automatically enroll social assistance clients into OESP.
- Retroactive adjustments to clients' credit, if necessary, could be addressed in the SAMS data exchange (assuming option #3 is pursued).

Considerations and Risks:

- Requires a new service delivery model (including new job specifications, MOU). Need to explore feasibility of a centralized service such as Service Ontario.
- Entails OESP policy and program design changes.
- OESP and social assistance have different eligibility criteria making integration of the application processes challenging. In particular, OESP considers the household in their eligibility determination whereas social assistance considers the family unit.
- Entails OEB operational and technological process changes to reflect the new application information and any new credit/matrix.
- Social assistance staff supported by a change management framework (e.g. communication material, business processes).
- A benefit specific to social assistance clients could be perceived as an equity issue, particularly by some populations, such as First Nations communities who have raised concerns that the OESP does not automatically qualify all First Nations community members.
- The implementation timing would come close to the potential implementation timing of the fully electronic SAMS data exchange, which would cause confusion for clients and staff, and make **Option 3** obsolete almost as soon as it began.

Approximate MCSS Cost: \$4.7M. OEB may have costs that have yet to be identified.

Options, continued

Option 3: OESP program eligibility and application process modified + SAMS data exchange

Approx. 12-month implementation

Focuses on the Increase Uptake and Automatic Qualification Objectives that entails changing MCSS and OESP service delivery and the OESP program

A modified eligibility criteria for social assistance clients and MOU to enable social assistance clients' electronic/automatic enrolment into OESP through SAMS.

Considerations and Risks:

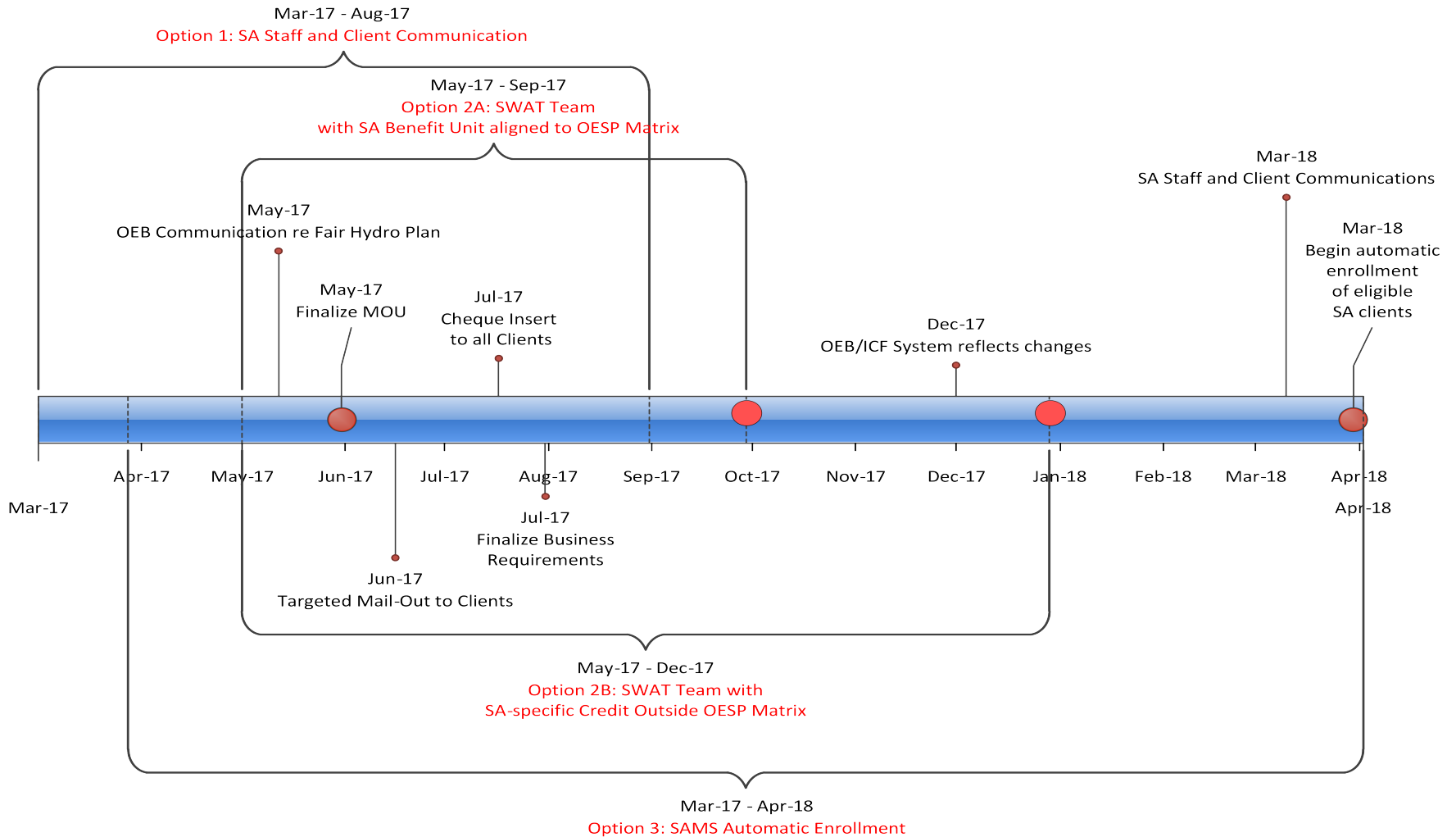
- An MOU is required.
- Resources required to enhance SAMS functionality and social assistance forms.
- Resources required to enhance OESP automated workflow system, policies, procedures and forms.
- Entails OEB operational and technological process changes to reflect the new application information and any new credit/matrix.
- A benefit specific to social assistance clients could be perceived as an equity issue, particularly by some populations, such as First Nations communities who have raised concerns that the OESP does not automatically qualify all First Nations community members.
- While implementation is not feasible before March 2018, this option could be pursued in parallel to the options above. However, it would be difficult for ICF to make system changes for this option if they are simultaneously making system changes to reflect options 2A or 2B.
- Provides adequate time to fully explore and mitigate risks associated with new processes, program eligibility structures, and operational requirements.
- Social assistance staff would still be supported with a change management framework (e.g. communication material, SAMS user guides, business processes).
- Despite changes required to service delivery process, the change would likely be perceived as an enhancement.

Approximate MCSS Cost: \$2M. OEB may have costs that have yet to be identified.

Confirmation Required on Policy Items

1. Social assistant client must also be a utility account holder.
 - No mechanism to enroll anyone into OESP unless they are an account holder.
2. Use of Family Benefit Unit income / people for social assistance clients instead of Household Member total income / people (as current OESP is designed).
 - While this aligns better with existing MCSS information available, using two different sources for determining income could be perceived as an inequity issue.
3. All social assistance recipients automatically eligible rather than recipients that meet the income eligibility criteria for OESP.
 - Although perhaps a small number, potential exists for situations where a recipient is eligible for social assistance but the larger household is significantly over the eligibility threshold and would not otherwise qualify creating a perception of inequity (note: issue has already arisen).
4. Creation of a separate OESP credit for social assistant recipients instead of mapping to the existing credit table.
 - Should policy item 3 be implemented for all social assistance recipients, this would likely be required to accommodate the decision.
 - Could result in similar households receiving different OESP amounts leading to a perception of inequity.
 - As OESP is designed to provide higher credits for households with more people (and therefore higher electricity consumption), with a single benefit some social assistance recipients might not receive what they would otherwise be eligible for. While they could reapply, this creates additional workload on the applicant and the system and potential for confusion.

Critical Path



Next Steps

- DMs and OEB Chair to decide and indicate on Approval slide below which option(s) MCSS, ENE and OEB should pursue.
- Upon DMs' and OEB Chair direction, MCSS, OEB and ENE staff discussions would focus on identifying the specific costs, timelines and available vehicles for implementing the option(s), and share a project plan with ADMs and the OEB VP.
- MCSS, OEB and ENE would begin to have more specific discussions on the implementation activities with delivery partners.

Approval

☐ We approve Option(s) _____ as presented.

☐ We approve Option(s) _____ with the following changes: