









October 20, 2010

Via fax: (604) 660-1505

Jane Holland, Advocate for Service Quality Office of the Advocate for Service Quality Suite 820 – 999 West Broadway Vancouver, BC V5Z 1K5

Dear Ms. Holland:

Re: Urgent concerns regarding community living services and supports

We write to express our urgent concerns regarding the current administration of provincial government services and supports for adults with developmental disabilities in British Columbia, and to call for action to address these matters.

Our concerns

In recent months, we have learned of funding reductions, service delivery model changes and other distressing matters related to services funded by the provincial government through its Crown agency, Community Living B.C. ("CLBC"). The following are among our top concerns.

1. Funding and service reductions

According to 2010 budget documents, CLBC's provincial government funding is frozen from 2010/11 to 2012/13, while its caseload is projected to grow by 10 per cent, or over 1300 individuals, during that time. Given these financial constraints, CLBC-funded agencies have advised that CLBC is implementing a budget management plan to reduce a \$22 million deficit projected for the 2010/11 fiscal year. The plan requires agencies to identify immediate service level reductions and proposed service redesigns to reduce costs. The service redesigns are focused on reducing staffed residential services (group homes) and increasing home sharing and other residential options.

Plan outcomes that we are hearing about include group home closures and staffing reductions, cuts to community inclusion staffing and services, and cost-driven proposals to relocate group home residents to home sharing placements without adequate consultation with individuals and families.

We fear that these budget decisions are putting adults with developmental disabilities at risk and are reducing service quality and capacity in the community living sector, at a time when demand for CLBC-funded services continues to rise.

2. Restriction of staffed residential options

Consistent with Canada's international legal obligations, CLBC has long stressed the importance of choice, independence and self-determination for individuals accessing community living services. But financially-driven group home closures and staffing cuts reduce individual choice and service options for adults with developmental disabilities.

Individuals and families continue to demand staffed residential services. However, under budget pressure from the provincial government, CLBC is creating barriers to group home placements. For example, a draft CLBC policy appears to require special, high-level approval for all new requests for staffed residential services and placements in existing vacancies.

We are concerned that cost considerations are preventing adults with developmental disabilities from accessing the services and supports of their choice, including staffed residential options.

3. Home sharing

Given its limited provincial funding, CLBC is seeking cost savings by increasingly focusing on moving adults with developmental disabilities into individualized, low-cost residential services – particularly home sharing placements. However, there appears to be little (if any) research literature on the costs and outcomes associated with home sharing, and there seems to be no legislated service standards or oversight mechanisms for small, family home-based residential services in British Columbia.

A recent UBC study of home sharing in B.C. found an urgent need for clear outcome measures and information on service quality. The study noted that home sharing may not be suitable for adults with greater and more complex support needs. It also reported a number of serious concerns with the home sharing model, mostly related to the safety and well being of individuals in placements.

In addition, the study touched on several issues of potential concern for individual home sharing service providers, related to funding and expenses, liability and home insurance, workplace injuries, and respite care.

Home sharing may be a good service option for some individuals, and many home sharing providers likely provide excellent support to the adults with whom they live. Still, we worry that CLBC is moving too quickly to a residential service delivery model that is largely unregulated and untested, and that it is doing so primarily on the basis of cost considerations that should not be the driving force for service planning and policy.

4. Guide to Support Allocation

It is our understanding that to facilitate some of the government-driven reductions and changes discussed above, CLBC is conducting reviews of individual funding levels using a relatively new assessment tool, the Guide to Support Allocation ("GSA"). The GSA is used to confirm the funded support to be provided to an individual, based on his or her disability-related need.

Serious questions and concerns have been raised in relation to the GSA and its current application. A recent government-commissioned review of CLBC's service delivery model outlined transparency issues and operational challenges related to the GSA. It noted that staff applying the GSA lack first-hand experience with individuals and families due to CLBC's organizational structure. Among other things, the review recommended revisiting the option of switching to one of the more established assessment tools operationalized and tested in other jurisdictions.

We are hearing that GSA assessments are being conducted without the awareness of families, and with inadequate consultation with service agency staff. Thus, we are concerned both with the GSA tool itself, and with the process established for its application.

Our call

British Columbia's community living sector is in crisis. Adults with developmental disabilities are at risk, as is the residential service and community inclusion infrastructure that supports them. Service and support options are being reduced, not expanded. Individuals and families are not being consulted.

We understand that your mandate includes participating in ministry and CLBC initiatives related to policy and planning. In this role, we urge you to recommend the following immediate actions:

- An end to cost-driven closures, redesigns and service reductions, and an increase in provincial funding to meet the service and support needs of adults with developmental disabilities in British Columbia.
- Renewed funding and support for individuals who choose group homes as their preferred residential service option, and the removal of administrative and other barriers to this service option.
- Initiation of Phase 2 of the Residential Options Project, under which adults living in residential alternatives to group homes (and their families) will be consulted to determine if they are living in their preferred residential option.
- A thorough review of home sharing costs, outcomes and best practices in B.C. and other jurisdictions, and the development and implementation of a regulatory framework for home sharing, covering matters such as service standards, outcome measures, licensing, health and safety, respite, recruitment, training, and oversight.
- A freeze on GSA assessments and an immediate review of the GSA tool and its application.

Thank you for considering our concerns and call for action. We look forward to your response.

Yours truly,

Cyndi Gerlach & Dawn Steele Co-administrators **Moms on the Move**

Anita Dadson President **BC Family Net Society**

Darryl Walker President B.C. Government and Service Employees' Union

Alanna Hendren Executive Director Developmental Disabilities Association

Jane Dyson Executive Director BC Coalition of People with Disabilities

cc: Sent via Email

Hon. Rich Coleman, Minister of Housing and Social Development Rick Mowles, Chief Executive Officer, Community Living British Columbia

Sent via Regular mail

Board of Directors, Community Living British Columbia Advisory Committee to the CLBC Board of Directors Central and South Okanagan Community Council North Community Council Richmond Community Council Surrey-Delta Community Council Vancouver Community Council Central and Upper Island Community Council North Okanagan Shuswap Community Council Simon Fraser Community Council Thompson Cariboo Community Council Kootenay Community Council North Shore Coast Community Council South Island Community Council Upper Fraser Community Council