

April 5, 2017

**Assured Income for the Severely Handicapped (AISH)
Action Plan
Response to the
Report of the Auditor General of Alberta**

April 5, 2017

Message from the Minister

The Assured Income for Severely Handicapped (AISH) program serves more than 55,000 Albertans. For Albertans who rely on it, AISH is more than just a government program, and more than just money in their pocket. It is a comprehensive system of supports and services that includes financial, health and other benefits along with a network throughout Alberta to ensure timely access to this program.

I would like to thank the Auditor General for his work and recommendations for improving the experience of Albertans who seek access to or are currently receiving supports and services from the AISH program. It is a large program, with a budget of almost a billion dollars, and the services and supports provided by the AISH program are tremendously important to those who rely on them. While we are eager to implement the changes recommended by the Auditor General, we know that any changes to such a large program must be made in a respectful, careful, and well thought out manner.

It is clear that there are long-standing issues with the AISH program that must be addressed.

Our government believes that all Albertans deserve to live in a stable home and be able to put food on the table. Our government will ensure the supports and services that Albertans rely on remain stable, accessible, and responsive to the changing needs of Albertans. We are already taking a number of actions, including providing stable funding, improving training programs for our employees, launching a new AISH website with plain language and easy-to-access resources, and simplifying the AISH application process.

It is my hope that this document will provide Albertans with a clear understanding of the steps we have taken so far to improve this program, and of planned actions with timeframes for implementation. It sets out a framework for a more client-centered AISH program by improving program accessibility, standards of support and services and reporting on efficiency of this program.

We know that there is always more that can be done, and we will be listening to Albertans with disabilities, as well as their family members and advocates, over the coming months and years, about how we can continue to support them to live safe, inclusive lives in their communities and make life better for them.

Thank you,

A handwritten signature in black ink, appearing to read 'Irfan Sabir', with a long horizontal flourish extending to the right.

Irfan Sabir
Minister of Community and Social Services

Introduction

In November 2016, the Auditor General released a report to recommend improvements to the AISH program. The report identified long-standing issues related to the program's application process, how the program is monitored and reported on, and the program's overall efficiency. The Government of Alberta values and takes seriously the recommendations of the Auditor General.

Albertans deserve a government that makes life better. Timely, easy and effective access to the AISH program will play an important role in making life better for Albertans.

Over 55,000 Albertans count on the AISH program each and every day. Over 12,000 applications were received by the AISH program in 2016. The AISH program provides important supports, including financial assistance, health benefits and personal benefits to Albertans who need it and the government has the important responsibility of protecting the AISH program and ensuring it is responsive to Albertans' needs.

This plan outlines our commitment to Albertans to make the AISH program better. We know that addressing long-standing issues in the AISH program will take time, collaboration with frontline staff, and an ongoing dialogue with the disability community.

RECOMMENDATION 1: IMPROVE PROGRAM ACCESSIBILITY

The Auditor General has identified important concerns regarding accessibility of the AISH program. In particular, the Auditor General indicates that the application process is complex and lengthy, Albertans applying for AISH do not have user-friendly guides and resources, and internal AISH program processes need improvement.

We are taking three key actions to improve accessibility of the AISH program and better support Albertans. We are:

- Making the AISH program information more accessible and user-friendly
- Simplifying the AISH application form
- Improving the internal AISH application process

More Accessible and User-Friendly Information

The Auditor General's report indicates that it is difficult to find key information about the AISH program on the AISH website. This makes it challenging for Albertans who need this information to apply for supports and services. To address this concern, we made changes to the AISH website in November 2016 (<https://www.alberta.ca/aish.aspx>). The website now includes more accessible information, updated links and contact information for all AISH offices, and can be more easily viewed on mobile devices and desktops. Work to make information more available and accessible is always ongoing, and we will continue to explore ways to improve accessibility of information for AISH applicants and clients.

AISH Application Form

The Auditor General raised concerns with respect to redundancy and lack of clarity in the general AISH application form and identified that the processes are not in place to ensure applicants who need quick access to supports are prioritized.

In December 2016, we drafted a simpler application form that eliminates duplication, clearly states the eligibility criteria and is more user-friendly. General, medical and financial eligibility is combined to create a simpler application and a one-step process. The draft form is simplified to better reflect and align with legislation. This new general application was tested with AISH clients, applicants and other key stakeholders beginning in March 2017. To support the transition to a new application form, we will be enhancing staff training and revising policy to ensure staff have been provided with proper support and guidance to process the new form. Following that, from September to December 2017, we will transition to an online AISH application process and form to make it more accessible for Albertans.

In December 2016, we also created a shortened application form, available in paper form and online to all Albertans, to support the prioritization of applicants with end-of-life care needs, individuals who applied or are already eligible for the Persons with Developmental Disabilities (PDD) program, and individuals who have been on AISH within the last two years who want benefits reinstated.

We will continue to listen to AISH clients' and applicants' feedback and ideas as we make changes to the AISH application form.

Improving Internal AISH Application Processes

The Auditor General's report indicates that the application process is ineffective and complex. That's why we are finding ways to make the process simpler and easier for Albertans.

In December 2016, we partnered with Alberta Health to review the application process and explore opportunities to make the medical eligibility process simpler for Albertans.

In April 2017, we are developing user-friendly guides for Albertans to provide guidance and support for Albertans who are applying to AISH. Topics covered by the guides will include:

- When to use the AISH Application Short Form
- An accessible guide to financial, general and medical eligibility for the AISH program
- Understanding employment income, exemptions and AISH benefits
- Other available supports and benefits

From September to December 2017, we will introduce a more coordinated application process between programs so Albertans don't have to provide similar information over and over. This will make it easier for Albertans who are already accessing other programs such as Income Support programs to apply for supports. We will also enhance in-person supports for Albertans applying for the AISH program.

RECOMMENDATION 2: SET SERVICE STANDARDS AND IMPROVE ELIGIBILITY PROCEDURES AND GUIDELINES

The Auditor General raises a number of concerns regarding processing times and eligibility. In particular, the Auditor General indicates that the department does not have standards to regularly monitor processing times, applicants who are not eligible for AISH do not receive consistent information in denial letters, appeal panel decisions are not tracked, staff do not receive adequate support and guidance to support decision-making, and “earning a livelihood” is not applied consistently to applicants and AISH clients.

In response to these concerns, we are taking six key actions. We are:

1. Setting standards for application processing times
2. Improving communication with applicants who are not eligible for AISH
3. Supporting staff decision-making through enhanced training and supports
4. Tracking and analyzing appeal panel decisions
5. Reviewing all eligibility policies including the effective date of eligibility, and amending as necessary, to ensure alignment to legislation, and to provide clarity and transparency
6. Strengthening internal oversights and implementing Ministry’s Internal Audit recommendations

Provincial Standards

The Auditor General indicates that the AISH program does not have adequate standards to track and monitor application processing times. To address this concern, we are developing baseline measures and provincial standards. This will ensure eligibility decisions are made in a timely way, including the targeted use of the AISH Application Short Form. Standards and timelines will be identified for the following points in the application process:

- **Applications**
 - Average time between receipt of application and check for completeness
 - Number of complete and incomplete applications received
 - Average time between application submission¹ and application completion
- **Determination of Eligibility**
 - Average time between application submission and eligibility decision
 - Average time between application completion and eligibility decision
- **Commencement of Benefits**
 - Average time between application submission and commencement of benefits
 - Average time between eligibility decision and commencement of benefits

In July 2017, we will begin monitoring these standards and report results quarterly.

¹ As reported by the OAG, 28% of applications received by the department are returned as incomplete. The department will monitor this measure and implement services to better support applicants in completing the application.

Communication with Applicants

The Auditor General indicates that individuals who are not eligible for AISH may receive inconsistent information from the department. We have implemented a standardized letter for applicants that explains the decision for those who are not eligible to receive AISH and includes:

- Information on the right to appeal within 30 days
- Timelines for submitting additional information (12 months)
- Contact information for other resources such as Alberta Supports and Canada Pension Plan – Disability

In March 2017, we will further improve the standardized letter to further include:

- An individualized description of why the applicant is not eligible
- Standardized descriptions of the general eligibility criteria
- A clear description of the distinction between new information submission and the appeals process

These improvements will ensure applicants understand the rationale for eligibility decisions. As part of this work, we will review opportunities to implement improved communication with denied applicants, including reaching out by phone.

Ministry Internal Audit Committee Recommendations

The Auditor General raises concerns about the Ministry Internal Audit and how its recommendations are used to improve the AISH program. We have initiated work with the Ministry Internal Audit to develop a plan to address concerns. By April/May 2017, we will identify and implement standards and processes for responding to Internal Ministry Audit findings and monitor for regional results.

Staff Guidance

The Auditor General indicates that staff use considerable judgement when assessing applications, but they do not receive sufficient training or guidance to support decision-making. To address this concern, we will be identifying policy and procedures where staff are required to make judgements and develop additional tools to support decision-making. Further, we are developing targets for completion of required training and implementing mandatory reporting. Staff training completion rates to date are:

- AISH Authority, Acts, Regulations, Policy & You: 94%
- Income and Assets: 87%

By September 2017, we will improve our provincial training strategy to include:

- The development of new training to incorporate changes resulting from a review of legislation and policies
- The development of a service delivery practice framework
- A review of job descriptions and minimum recruitment standards

- The development of orientation guides and standards
- The development of a suite of resources and tools to support decision-making and efficient day-to-day service delivery (e.g.; checklists, info guides)
- The development of curriculum
 - Program-based
 - Competency-based
- The development of multi-modal training delivery (e.g.; mentoring and peer coaching strategies, online learning opportunities)
- The development of an evaluation plan

Our program will have clear policies and we will develop an adjudicator framework and guidelines to support staff in consistent decision-making.

Appeals

The Auditor General raises concerns about tracking of AISH appeal panel decisions. These decisions can provide critical information for the AISH program to improve policy and process. To address this concern, in August 2016, we began tracking all appeal panel decisions where the panel has overturned the program’s medical eligibility decision to identify areas for staff practice improvement, process or policy review and training.

In April/May 2017, we will develop a process to analyze appeal panel decisions where the panel has overturned the program’s eligibility decisions. In June 2017, we will report quarterly on appeal panel decisions where the panel has overturned the program’s medical eligibility decision. We will also revise the Notice of Appeal Form to make it easier for Albertans to use.

In August 2017, we will move all processes supporting AISH appeals to the Ministry’s centralized Appeals Secretariat to provide objective support through the appeals process.

In October 2017, we will establish an Appeals advisory service to support Albertans throughout the appeal process.

Earning a Livelihood

The Auditor General indicates that the AISH applicants and AISH clients are treated differently in terms of “earning a livelihood.” Upon further review, and to address this concern, we will review all of our eligibility policies and practices, and amend as necessary, to ensure consistent application and alignment to legislation.

RECOMMENDATION 3: IMPROVE REPORTING ON EFFICIENCY

The Auditor General indicates that the AISH program has inadequate performance measures and processes to monitor and report on the efficiency of the program. This means that the program is unable to monitor outcomes, identify gaps and make improvements.

In response to these concerns, we are taking action to develop additional performance measures and enhance our public reporting on AISH program outcomes.

As identified by the Auditor General, AISH currently reports a survey-based measure in the Ministry's business plan and annual report. This measure does not speak to the efficiency of the program. To address this issue, we will identify relevant measures and report publicly on those measures.

Additional Performance Measures / Enhance Public Reporting

Extensive additional work will be undertaken to add to the AISH program's performance measures and public reporting. By December 2017, we will develop and report on new measures for the AISH program.

The following indicators of the efficiency and effectiveness of AISH program delivery will be monitored and publicly reported on:

- **Efficiency/timeliness of program delivery:**
 - **Applications**
 - Average time between receipt of application and check for completeness
 - Number of complete and incomplete applications received
 - Average time between application submission and application completion
 - **Determination of Eligibility**
 - Average time between application submission and eligibility decision
 - Average time between application completion and eligibility decision
 - **Commencement of Benefits**
 - Average time between application submission and commencement of benefits
 - Average time between eligibility decision and commencement of benefits
- **Effectiveness of program delivery:**
 - Per cent of decisions which result in ineligibility
 - Per cent of administrative reviews where initial department decisions are overturned
 - Per cent of applications submitting additional information within 12 months resulting in a new eligibility decision
 - Number of decisions which result in ineligibility compared to number of appeals submitted
 - Number of decisions which result in ineligibility which are overturned at appeal
- Additional measures will be developed to identify the consistency of eligibility determination with legislation and policy

We will also report on program statistics (e.g.; caseload numbers, growth, profiles, budget and costs) and identify indicators to monitor for trends that may impact Albertans accessing the program (e.g.; economic indicators, population growth).

In December 2018, we will review new performance measures and develop additional targets for performance measures as required.

Conclusion

Our government is always looking for ways to make life better for Albertans. We are committed to continuing to protect and improve important social supports, like the AISH program, to ensure that these supports are available and accessible when needed, and delivered in a respectful manner.

The goal of the AISH program is to support Albertans with a permanent disability to be financially stable so they can live as independently as possible and thrive in their communities. While we recognize that the issues facing this program are long-standing, the actions we are taking and are planning to take, as outlined in this report, are an important step in improving the experience of Albertans applying to or being supported by the AISH program.

Our goal is for all of our supports and services to be responsive to the unique and often complex needs of those who rely on them. We have heard concerns about the AISH program loud and clear, and we are eager to see changes to this program improve Albertans' lives meaningfully.

We look forward to providing updates on the progress of this work in the coming months.

APPENDIX

What is the AISH program?

The Assured Income for Severely Handicapped (AISH) program provides financial assistance and health benefits to adult Albertans with a permanent disability that substantially limits their ability to earn a livelihood². Albertans who meet the program's eligibility criteria may receive a monthly living allowance, a child benefit, health benefits and personal benefits.

To qualify and maintain eligibility for the AISH program, criteria for general, financial and severe handicap eligibility must be met (for detailed information, please visit our website <https://www.alberta.ca/aish-eligibility.aspx>). To be eligible, an Albertan must meet the following:

- General Eligibility
 - Be 18 years or older and not eligible to receive an Old Age Security pension
 - Ordinarily reside in Alberta and be a Canadian citizen or permanent resident
 - Not reside in a correctional institution or a designated mental health facility
- Financial Eligibility
 - Not have income and/or assets that exceed the limits allowed under the program
- Severe Handicap Eligibility
 - Have a severe handicap that is likely to remain permanent and substantially limits his or her ability to earn a living and there is no training, medical treatment or therapy that would materially improve a person's ability to earn a living

The current AISH application is a two stage process. The first stage involves the applicant submitting a complete AISH application form along with supporting documents. This information is reviewed by AISH staff to ensure the applicant meets general and financial eligibility (age, residency, income and assets). This form includes a checklist for the client.

If the general and financial eligibility is met, applicants are sent a medical form for their physician to complete. There are 3 different medical forms that could be sent depending on the indicated medical condition.

- AISH Medical Report
- Assessment of Mental Functioning
- Functional Ability Assessment

² As per AISH policy, earning a livelihood means being employed a minimum of 30 hours per week at a reasonable wage. Reasonable wage means minimum wage or a wage agreed to under a permit for employment for persons with disabilities. While AISH applicants and clients may not be able to fully support themselves through work, they may still be able to work or do volunteer work. AISH encourages clients to work to the extent they are able. (www.humanservices.alberta.ca/AWonline/AISH/7215.html)

The cost to complete the form is the responsibility of the applicant unless they are in receipt of Income Support benefits. Once the medical form is received back, AISH staff adjudicate to determine medical eligibility.

Albertans can access AISH application forms online at our website at <https://www.alberta.ca/aish.aspx> or in person at Alberta Supports Offices.

Albertans determined to be eligible for the AISH program receive a monthly living allowance (\$1,588 maximum per month, effective April 2012) and health benefits. Health benefits may also assist the Albertan's spouse or partner and dependent children. Eligible Albertans may also qualify for a child benefit to assist with the cost of raising dependent children and personal benefits to help with specific needs such as a special diet or assistance in an emergency. Personal benefits may also assist a client's dependent children.

The AISH program supports over 55,000 Albertans:

- Most Albertans accessing AISH have been on the program for over 5 years (64%) and live in Alberta's urban centres (63%)
- The program supports Albertans with severe and permanent disabilities in three areas:
 - Physical disabilities (45%)
 - Mental health disabilities (31%)
 - Cognitive disabilities (24%)
- The largest client group (over 13,000 Albertans or 25% of the overall AISH caseload) has been diagnosed with psychotic/schizophrenia or an affective disorder
- 44% of Albertans using the program are between the ages of 50 and 64
- 19% of Albertans accessing AISH reported employment earnings in the month of December 2016 – of these, 74% reported earnings between \$0 - \$800³

For more information on the AISH program, please visit our website at <https://www.alberta.ca/aish.aspx>.

³ Only part of employment or self-employment income affects an Albertan's AISH living allowance. For single clients, the first \$800 of total net employment and self-employment income is fully exempt, as well as 50% of any amount up to \$1,500 for a maximum exemption of \$1,150.