

# Provincial Adhoc Working Group on Bill 77 Position Paper

Submitted August 5th, 2008

Prepared by Judith McGill on behalf of the Provincial Adhoc  
Working Group on Bill 77

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**Members of the Provincial Adhoc Working Group represent the following regional and provincial organizations:** Autism Ontario, Community Living Ontario, Durham Association of Family Respite Services, Durham Family Network, Families for a Secure Future, Family Alliance of Ontario; Guelph Services for the Autistic, Individualized Funding Coalition for Ontario; Kerry's Place, Special Services at Home Provincial Coalition, Toronto Family Network, Windsor Essex Brokerage, Windsor Essex Family Network. Members come from seven regions of the province.

## Introduction

The Liberal Government and the Minister of Community and Social Services are to be commended for updating the Developmental Disabilities Act after almost thirty-five years. This work is long overdue. As well, the Liberal Government must be highly praised for finally establishing direct funding as a bona fide choice for individuals with developmental disabilities and their families.

We make this submission in the spirit of collaboration with the goal of moving forward the province's vision of inclusion.

Our recommendations are drawn from substantial collective analysis over full day meetings in June and July this year and after several iterations of the document were developed based on feedback from each of the Working Group members. We are prepared to meet separately with the Standing Committee to clarify our points once the Public Hearings are completed in August, 2008. Once this Bill is passed, it is imperative for the government to have open and transparent consultation in regard to the regulations.

**The Working Group requests that the Standing Committee on Social Policy make clear its commitment that the public will be fully consulted on concepts and ideas related to the regulatory framework for the legislation before the government undertakes the process of drafting and adopting regulations.**

### **1) Change in the name of Bill 77**

For Bill 77 to represent a real change in direction within the Ministry of Community and Social Services, it needs to more accurately reflect this intention in its name. The name of the Bill also needs to reflect more accurately the stated purpose of reform.

#### **Recommendation:**

**Bill 77 - An Act to enhance social inclusion for persons who have developmental disabilities, to repeal the Developmental Services Act and to amend certain other statutes.**

### **2) Use of Language:**

In the compendium to Bill 77 there is consistent and constant use of the phrase "services and supports" and yet in the Bill itself the term "services" is used exclusively with hardly any mention of supports. The only reference to supports is in Section 4 where the legislation defines services. The term supports in this case is used in reference to the nature of services. This is not adequate to reflect a new vision that includes support.

#### **Recommendation:**

**In every instance where "services" are mentioned in Bill 77 to indicate a range of options that it be replaced with the phrase "supports and services" to demonstrate the Ministry's commitment to a range of options/choices for individuals and families beyond just services.**

### **3) Need for a Preamble:**

It is imperative before Bill 77 is passed into law that a preamble be established that describes the philosophical rationale(s) for making these momentous changes and that clarifies the inherent and legal rights of people with disabilities. A clearly stated articulation of the purpose and intent of Bill 77 will also assist policy makers in ensuring that all regulations related to the legislation are coherent and aligned with the overall intent of the bill. In addition, a preamble will provide further clarity for legal interpretations of the bill into the future.

#### **Recommendation:**

**That the government of Ontario restate their transformation principles in the preamble to Bill 77 and that it also refer to related United Nations documents that have significant bearing on the Ontario legislation.**

#### ***Suggested phrasing:***

- Our vision is to enable people to live in their communities as independently as possible and to participate as full citizens in all aspects of community life.
- We are guided by the United Nations principles of respect for persons' inherent dignity, individual autonomy including the freedom to make one's own choices and equality of opportunity.
- The government of Ontario is committed to revitalizing and transforming supports for people who have a developmental disability so that they are person-directed, accessible, fair and equitable.
- We recognize the need to offer individuals and their families independent facilitation support on an ongoing basis in order to promote self-determination and participation in all aspects of community life.
- A key principle to direct funding is accessibility and portability - so that funding and supports are flexible and go with the person if he/she chooses to use it in another way with another organization or moves to another community.

***The aim of this legislation is: Suggested phrasing***

- increasing choices in the way people who have a developmental disability and their families/caregivers receive supports by making direct funding available to those who wish a greater voice and more active role in how services are provided, when, where, and by whom.
- provide funding and supports that are more flexible and individually tailored so that people who have a developmental disability and their families can either purchase what they need directly from independent contractors, use existing agency programs, or a combination of both.
- streamlining the process to get supports through a single point of access that makes it easier for individuals and their families/caregivers to navigate the system and build a service and support plan that meets their needs and enhances their citizenship.
- offering supports that are designed to balance appropriate supervision, especially for those who are most at risk, with the right to self-determination, privacy and confidentiality.
- designing a system of service delivery that will include mechanisms to hold service providers accountable to the people using their services and the province for the quality and outcome of the supports they provide.

**4) Recognition of Legal Capacity:**

It is highly recommended that Bill 77 include provisions to recognize the legal capacity of people who have an intellectual disability and provide for "supported decision making" in order to ensure that people can enjoy their legal capacity. "Supported decision making"

has been considered a viable alternative to substitute decision making in Canada for over one decade and has recently been adopted into international law under Article 12 of the UN Convention on the Rights of Persons with Disabilities. Including the recognition of the legal capacity of the individual in this Bill and supporting amendments that enshrine "supported decision making" may well be the most significant steps this government can take towards citizenship. Providing such recognition is essential in order to make possible a mechanism through which individuals can enter into an agreement for direct funding without having to surrender authority to a substitute decision maker or guardian.

#### **Recommendations:**

**Add a provision to Bill 77 that any decision that is required in the context of this legislation regarding a benefit that a person with a disability is eligible to apply for or receive under this Act is to be made to the greatest extent possible by the person receiving that benefit, with whatever support is required in order for that person to exercise his or her legal capacity to make that decision.**

**The legislation should state that where such decisions are not made solely by the individual on his or her own, the process by which they are reached is deemed to be an "alternative course of action" in keeping with the provisions in section 22(3) (regarding property matters) and section 55(2) (regarding personal care matters) of the Substitute Decisions Act.**

**A further provision would clarify that, in cases where a person with a disability has granted a power of attorney for property or personal care, or both, the exercise of that power of attorney in relation to any decision pertaining to a service or benefit available under this Act must include the provision of support to the individual grantor, either by the holder of the power of attorney or by an independent third party, or both, to enable the person with a disability to participate as fully as possible in the decision-making process.**

#### **5) Accessibility and Portability:**

Accessibility and portability are not mentioned in the legislation even though it is a fundamental rights issue when it comes to making direct funding an option. After individuals receive a funding allocation he/she must be assured of his/her right to have those dollars available to him/her if he/she chooses to use it in another way with another organization or moves to another community.

**Recommendation: That the following be included in the preamble**

**A key principle to direct funding is accessibility and portability - so that funding and supports are flexible and go with the person if he/she chooses to use it in another way with another organization or moves to another community.**

## **6) Independent Facilitation Supports:**

There is no mention in Bill 77 of the need to offer independent Facilitation and planning support to individuals and their families/caregivers. While some of the details related to Facilitation and planning may be the subject of subsequent regulation and policy, it is clear to the Working Group that it must be addressed in the legislation from the outset and that provision be made in the legislation to allow for funding of Facilitation and planning. Intentional provision of these supports does not only enhance the direct funding option, but it is also critical for dealing with the fact that individuals need support to get on with their lives as they wait for funding and services to become available. It is believed that these supports are the most prudent supports that the government can make available if there is to be equality of opportunity in the system. In addition, it ensures that individuals participate in directing their lives and making key decisions in their lives to the extent possible with the assistance of their family and social networks.

This kind of focussed, goal directed support needs to be provided at the point that individuals are determined eligible and be provided on an ongoing basis. By making resources available at the point of being deemed eligible, it makes it possible to ensure that individuals, their families, caregivers are truly making informed decisions during the application process and are aware of what the choice between direct funding and traditional services entails. Beyond comprehending what the choices entail, it also assists the individual and their family, caregivers to gain some clarity on how the individual's life might unfold in the future and begin setting out goals and plans to move forward. It can assist a person to build their personal network and strengthen family and other significant relationships as well as find meaningful ways to participate and contribute to their communities. It ensures enhanced accountability and improved adherence to the stated objective of assisting people to live independent lives in the community. It is also consistent with the aim of enhancing citizenship by working to shift reliance for support away from government funding and towards the kinds of supports that all citizens rely on.

Facilitation and planning supports must be viewed as a disability-related support. It needs to be independent so that choices can be explored and chosen free of any conflicts of interest on the part of the Facilitator. Because of this, Facilitation support cannot be offered by the Application Centres.

## **Recommendations:**

**Once eligibility has been determined, applicants shall have access to resources for ongoing, independent facilitation and planning supports.**

### **Amendment to Part 1 of Bill 77**

**Section 2 (interpretation, eligibility for services and funding)**

**c) resources for ongoing, independent facilitation and planning supports.**

### **Amendment to Part 1 of Bill 77**

**Section 4 (services).**

**6) Any other prescribed services**

#### **Definitions**

"professional and specialized services" includes services provided by a psychologist, social worker, or speech language pathologist, **Independent Facilitator/Planner** or such other services as may be prescribed.

## **7) Prioritization and Waiting Lists:**

The Provincial Adhoc Working Group on Bill 77 takes the position that Provincial legislators must reconsider the prioritization mechanisms provided for in this Bill. People's essential needs must simply not be addressed through waiting lists that are prioritized in terms of "most in need" criteria. Application Centres are premised on the need for waiting lists and Bill 77 sets out to legitimize waiting lists. It assumes that there will never be adequate funding to support individuals with developmental disabilities in this province and that some will not ever get the basic support that they need. This basic presumption must be challenged. If there is to be true equity and fairness in the sector there must not be a focus solely on those defined as "most in need". Giving priority ranking to those considered most in need without adequately responding to a majority of others needs is an issue of fundamental rights. As well, the use of waiting lists to deal with peoples most essential needs has a discriminatory effect across the board.

These provisions to legislate waiting lists are quite alarming, especially when considered in conjunction with the provisions for creating application centres that would offload many government responsibilities to an arms length third party. Taken together, they provide the message that government is looking to systemically underfund the sector leaving others to take deal with the complaints and the suffering that result.

## **Recommendation:**

**Ongoing, Independent Facilitation and planning support shall be offered as a basic right to each and every individual with a developmental disability once they are deemed eligible. By offering this as a minimal provision of support**

once they are deemed eligible, the Ministry will ensure that individuals are not severely disadvantaged as they wait for access to direct funding or services.

## **8) Application Centres:**

The Provincial Adhoc Working Group strongly cautions the Ministry against setting out the specific functions of the Application Centres in legislation. It is far more appropriate to lay these out in Regulations so that changes can be made as the model develops over time, safeguards are implemented and practice is monitored and evaluated. The Adhoc group believes that these inherent conflicts of interest are serious enough that the Ministry is ill-advised to proceed with the description of the application centres as it is laid out in the legislation. At this point, it is advised that considerable thought needs to be put into how to separate out certain functions so that the conflicts do not raise such serious concerns and so that safeguards can be built in.

### **Recommendation:**

**An assessment of the conflicts of interest apparent in the proposed legislation as it pertains to the Application Centres be undertaken. The Government consider limiting the description of the stated functions of the Application Centres so that a system of regulatory safeguards can be created to deal with the inherent conflicts.**

### ***Concerns and Inherent Conflicts identified in the existing legislation:***

According to the legislation, Application Centre's are responsible for all functions related to determination of service or funding need including, assessing the applicant's needs, developing a service profile, allocating resources and prioritizing the individual's application. At the same time, the Application Centre is also responsible for managing service and funding provision including waiting lists, maintaining an inventory of services in the region and informing and referring individuals of vacancies in agency services. *This is a conflict of interest.*

There is a serious conflict of interest in managing service and funding provision at the same time as being responsible for determination of service or funding needs. It is far too easy for expediency measures to take hold of application centres when they are responsible for needs assessment and referrals/placement. It is far too easy for the system to bring pressure to bear on the person/s responsible to reduce waiting lists by matching people with existing vacancies. It is also far too easy for the person responsible to bring pressure to bear on individuals to fill available service vacancies rather than help them think about what might be innovative or best suited to them.

As was the case in the MCSS Passports direct funding pilot program, Coordinators offered more assistance to those who were considering/looking for traditional services and service vacancies. It was reported by some who participated in the program that some Coordinators actively dissuaded individuals and families interested in creating their own individualized model with direct funding from applying for it by stating that they would not be able to manage the complexity of hiring and overseeing their own staff. How will these built in "system biases" be safeguarded against? Given that application centres will be responsible for managing wait lists for services and funding and presumably reducing wait lists, the Adhoc group feels that application centre staff are in a potential conflict of interest position when informing people about their choices.

Having the persons responsible for assessment of applications and determining allocation and prioritization also assisting with filling out applications is a *direct conflict of interest*.

An additional note of concern from the Adhoc Group relates to who will be hired to undertake the determination of eligibility (the Assessors) and the assessment of needs (the Service Coordinators)? Practice has shown that people who have been employed by local agencies that have previous experience and preconceptions of certain individuals and families are often hired/seconded into these positions. If families feel that they will be disadvantaged in the assessment process because of a previous relationship with an Assessor and/or Coordinator, they should be able to request an impartial review of the decision or a replacement. The legislation does not provide for this.

There is also a significant conflict of interest in having Application Centres take on the role of monitoring customer satisfaction. When Application Centres are being designed with such overarching roles and responsibilities, they cannot be given the system's accountability role as well. Monitoring so-called "customer satisfaction" must be independent and at arm's length.

According to the proposed legislation, agents of the Application Centre are given the authority to act as a direct funding "bank" for individuals if they so choose. They also have the authority to take over misused funds and administer funds in general. In administering funds and reviewing expenditures and regular reports, they will be responsible for the use and administration of under spent funds. *There is a conflict of interest in combining these functions.*

**One Stop Shopping:** The Provincial Adhoc Working Group appreciates the fact that during the transformation public consultations individuals and their families expressed y that  
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they were interested in there being a focal point for the Ministry so that they could go to one place/source to obtain any information and resources that they needed. Even though this is true, the placing all of the assessment, determination and prioritization roles and functions into the hands of a singular agency is viewed as unwise. Individuals and their families understand intimately the danger of having one person being responsible for assessment, allocation and prioritization. They do not trust a centralized system that has no checks and balances in terms of abuse of power and decision making.

**Governance:** The Application Centres are viewed to be analogous to the Ministry of Health's Community Care Access Centres (CCAC) home care model in so much as the Ministry has divested much of their authority to the new Application centres. The Provincial Adhoc Working Group on Bill 77 believes it is necessary to be provided with information on the governance and administration of the Application Centres. To what degree will they act autonomously in each region? To what degree will individuals and families be involved as partners in their governance? Will there be community boards? Will there be advisory groups? Is the setting up of Application Centres a veiled attempt at privatizing the sector and if so, to what aim?

**Lack of Resource Commitment:** The Provincial Adhoc Working Group on Bill 77 has heard that the Ministry expects the Application Centres to be cost neutral and to replace the existing agencies in each region that have played similar roles and had analogous functions. The group feels strongly that transformation in the sector can not happen without a commitment of resources to make the system maximally responsive. What is the Ministry prepared to do to make these new Application Centres work for families by bringing resources to bear? There has been in the past unequal access to direct funding options as compared to agency service options. What is the Government of Ontario going to do to ensure that new financial resources are provided for direct funding and Facilitation supports to individuals and families as a bona fide option now that it is provided for in the legislation?

## **9) Direct Funding Wage Disparity:**

Currently there is a serious wage disparity in the sector between those working in agencies and those working in the community under direct funding arrangements. Actions must be taken to rectify this inequity and to ensure that individuals and their families, caregivers can secure competent independent contractors to assist them to participate meaningfully in the community.

### **Recommendation:**

**For direct funding to be considered a "bona fide" option in this legislation, thorough measures must be in place to ensure that individuals and their**

families, caregivers are able to purchase quality support within the community. Such measures must ensure provisions through which contractors available for hire through direct funding can be paid a living wage, comparable to that of staff in service agencies taking into account health and other benefits typically not available to contractors, that there is an expectation of quality in the support provided by these contractors and that adequate training is made available to all workers in the sector as needed.

## **10) Protections and Appeals:**

### **Application Process:**

Currently the legislation related to the Application Centres provides for internal reviews and not independent appeals of any kinds. It also does not take into consideration due process for individuals related to the termination of funding or reinstating funding in the instance of misuse by a third party.

### **Recommendations:**

An "appeal" mechanism that is independent of the applications centre and that provides for an unbiased third party to consider appeals to such matters as determinations of eligibility and assessment of needs should be included in the legislation. This provision of a third party appeal, rather than an internal review must also apply to 30 (4) which deals with an agency or application centre for whom the government has elected to appoint a manager.

The Act should clarify that a process be in place through which a person for whom direct funding has been terminated can have the funding reinstated after meeting specified requirements.

An individual's direct funding agreement should never be cancelled for reasons of misuse where direct funding was being managed by someone other than the individual, including a family member or guardian, and the individual is found to not have played a role in the misuse.

### **Protection against abuse**

#### **Recommendation:**

The legislation should be drafted in such a way that protections related to the identification and reporting of personal abuse can be developed and implemented as community organizations, government and stakeholders identify the best approach that can be taken. We further recommend that government undertake a process to consider the best mechanisms through which all adults who are at risk of abuse can be protected.

## **The Right to Privacy and Security**

The Provincial Adhoc Working Group on Bill 77 is concerned with the labour instability in the sector and the impact labour strikes can have on the lives of individuals that are reliant on services for their sense of peace and security. It believes that these individuals with developmental disabilities are made tremendously more vulnerable when unions are able to use strategic strikes in negotiating settlements.

### **Recommendation:**

**A provision should be established within the legislation that identifies Developmental Services as a no-strike sector. This provision should include a mechanism for using arbitrated settlement to address future labour disagreements. Provisions such as those found in the Hospital Labour Disputes Arbitration Act should be included within Bill 77 with the aim of ensuring that people's homes and lives not be disrupted due to labour strikes.**

## **Inspections and Operations**

### **Recommendation:**

**The rights of adults who have a developmental disability to feel secure in their home must be protected and this includes the requirement that an official entering the home must secure a warrant based on reasonable assumptions of wrong doing in the home. This should apply equally to all types of residences including supported group living residences, intensive support residences and people's private homes.**

## **11) Community Development and Infrastructure**

The Government must show a commitment to community development and fostering innovation if the changes set out in Bill 77 are to be carried out in a purposeful and coherent way. There are a number of infrastructure supports that need to be put in place in local communities across the province.

### **Recommendations:**

**To ensure that family governed organizations can continue to evolve and respond positively to the changing demands of individuals and their families, caregivers, Bill 77 must allow for investments to support the development and sharing of innovative ideas and approaches.**

**The Bill should make provision for the development and funding of infrastructure supports necessary for direct funding including Independent Facilitation supports.**

**Bill 77 should make provision for funding of innovative community development initiatives that can enhance the outcomes achieved through the provision of direct supports and funding.**

**It is crucial for the developmental services sector to ensure that independent self advocacy groups are able to organize in a fashion that permits them to play an integral role in the public discourse related to the inclusion of people who have a developmental disability. The Provincial Working Group on Bill 77 recommends that Bill 77 make provision for funding of such independent self advocacy groups.**

**Service agencies must be supported to develop responsive systems for facilitating direct funding and portability. Bill 77 must allow for investments of this kind.**

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# Provincial Adhoc Working Group on Bill 77

August 5<sup>th</sup> 2008

## Summary of Recommendations

### **1) Name of the Bill:**

#### **Recommendation:**

Bill 77 - An act to enhance social inclusion for persons who have developmental disabilities, to repeal the Developmental Services Act and to amend certain other statutes.

### **2) Use of Language:**

#### **Recommendation:**

In every instance where "services" are mentioned in the Bill to indicate a range of options that it be replaced with the phrase "supports and services" to demonstrate the Ministry's commitment to a range of options for individuals and families beyond just services.

### **3) Preamble:**

#### **Recommendation:**

That the government of Ontario restate their transformation principles in the preamble to the Bill and that it also refer to related United Nations documents that have significant bearing on the legislation.

### **4) Recognition of Legal Capacity:**

#### **Recommendations:**

Add a provision that any decision that is required in the context of this legislation regarding a benefit that a person with a disability is eligible to apply for or receive under this Act is to be made to the greatest extent possible by the person receiving that benefit, with whatever support is required in order for that person to exercise his or her legal capacity to make that decision.

The legislation should state that where such decisions are not made solely by the individual on his or her own, the process by which they are reached is deemed to be an "alternative course of action" in keeping with the provisions in section 22(3) (regarding property matters) and section 55(2) (regarding personal care matters) of the Substitute Decisions Act.

A further provision would clarify that, in cases where a person with a disability has granted a power of attorney for property or personal care, or both, the exercise of

that power of attorney in relation to any decision pertaining to a service or benefit available under this Act must include the provision of support to the individual grantor, either by the holder of the power of attorney or by an independent third party, or both, to enable the person with a disability to participate as fully as possible in the decision-making process.

## **5) Accessibility and Portability:**

**Recommendation:** *That the following be included in the preamble.* A key principle to direct funding is accessibility and portability - so that funding and supports are flexible and go with the person if he/she chooses to use it in another way with another organization or moves to another community.

## **6) Independent Facilitation Supports:**

### **Recommendation:**

Once eligibility has been determined, applicants shall have access to resources for ongoing, independent facilitation and planning supports.

Amendment to Part 1 of Bill 77

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Definitions "professional and specialized services" includes services provided by a psychologist, social worker, or speech language pathologist, independent facilitator planner or such other services as may be prescribed.

## **7) Prioritization and Equity**

### **Recommendation:**

Ongoing, Independent Facilitation and planning support shall be offered as a basic right to each and every individual with a developmental disability once they are deemed eligible for funding and/or services. By offering this as a minimal provision of support once they are deemed eligible, the Ministry will ensure that individuals are not severely disadvantaged as they wait for access to direct funding or services.

## **8) Application Centres**

### **Recommendation:**

The Provincial Adhoc Working Group recommends that the government assess the conflicts of interest apparent in the current legislation as it pertains to the

Application Centres and consider limiting the description of the stated functions so that a system of regulatory safeguards can be created to deal with the inherent conflicts.

## **9) Direct Funding Wage Disparity:**

### **Recommendation:**

For direct funding to be considered a "bona fide" option in this legislation, thorough measures must be in place to ensure that individuals and their families, caregivers are able to purchase quality support within the community. Such measures must ensure provisions through which contractors available for hire through direct funding can be paid a living wage, comparable to that of staff in service agencies, that there is an expectation of quality in the support provided by these contractors and that adequate training is made available to all workers in the sector as needed.

## **10) Protections and Appeals:**

### **Recommendation:**

An "appeal" mechanism that is independent of the applications centre and that provides for an unbiased third party to consider appeals to such matters as determinations of eligibility and assessment of needs should be included in the legislation. This provision of a third party appeal, rather than an internal review must also apply to 30 (4) which deals with an agency or application centre for whom the government has elected to appoint a manager.

The Act should clarify that a process be in place through which a person for whom direct funding has been terminated can have the funding reinstated after meeting specified requirements.

An individual's direct funding agreement should never be cancelled for reasons of misuse where direct funding was being managed by someone other than the individual, including a family member or guardian, and the individual is found to not have played a role in the misuse.

### **Protection against abuse**

#### **Recommendation:**

The legislation should be drafted in such a way that protections related to the identification and reporting of personal abuse can be developed and implemented as community organizations, government and stakeholders identify the best approach that can be taken. We further recommend that government undertake a process to consider the best mechanisms through which all adults who are at risk of abuse can be protected.

## **The Right to Privacy and Security**

### **Recommendation:**

A provision should be established within the legislation that identifies Developmental Services as a no-strike sector. This provision should include a mechanism for using arbitrated settlement to address future labour disagreements. Provisions such as those found in the Hospital Labour Disputes Arbitration Act should be included within Bill 77 with the aim of ensuring that people's homes and lives not be disrupted due to labour strikes.

## **Inspections and Operations**

### **Recommendations**

The rights of adults who have a developmental disability to feel secure in their home must be protected and this includes the requirement that an official entering the home must secure a warrant based on reasonable assumptions of wrong doing in the home. This should apply equally to all types of residences including supported group living residences, intensive support residences and people's private homes.

## **11) Community Development and Infrastructure**

### **Recommendations:**

To ensure that family governed organizations can continue to evolve and respond positively to the changing demands of individuals and their families, caregivers, Bill 77 must allow for investments to support the development and sharing of innovative approaches.

The Bill should make provision for the development and funding of infrastructure supports necessary for direct funding including Independent Facilitation supports.

Bill 77 should make provision for funding of innovative community development initiatives that can enhance the outcomes achieved through the provision of direct supports and funding.

It is crucial for the developmental services sector to ensure that independent self advocacy groups are able to organize in a fashion that permits them to play an integral role in the public discourse related to the inclusion of people who have a developmental disability. We recommend that Bill 77 make provision for funding of such independent self advocacy groups.

Service agencies must be supported to develop responsive systems for facilitating direct funding and portability. Bill 77 must allow for investments of this kind.