

# The Corporation of the Town of Milton

Report To:	Council
From:	Joy Anderson, Director, Culture & Community Investment
Date:	April 15, 2019
Report No:	COMS-005-19
Subject:	Policy Update – Town of Milton Financial Assistance
Recommendation:	THAT Council approve the changes to Policy 156 "Financial Assistance" attached as Schedule A.

#### **EXECUTIVE SUMMARY**

The Town of Milton has been providing financial support to assist Milton residents in their participation in Town recreation programs since 1994. The policy was last updated in 2009. Staff are recommending an updated policy to replace Corporate Policy 156 – "Fee Assistance" to reflect the Town's current practices, changes in recreation and the Milton community.

#### REPORT Background

Since 1994, the Town of Milton has offered financial assistance to support residents in accessing recreation programs offered by the Town. In addition, staff link residents with other financial assistance programs that can increase a family's ability to participate in recreation activities offered by the Town and community providers.

In 2009 the Town's Financial Assistance Program served a community of approximately 73,000 residents with 57 families (93 individuals) receiving support. Milton's population is currently over 110,000 residents and in 2018, financial support was provided to 546 families (1,248 individuals). The following chart details the Town's actual expenditure associated with this program, as well as the number of residents the program has supported over the last 4 years.

Year	Families	Children / Youth (under 18)	Adults	Budget	Actual Investment
2015	259	365	228	\$53,000	\$96,310
2016	354	574	342	\$71,400	\$138,722
2017	419	644	415	\$93,000	\$163,742
2018	546	739	509	\$116,200	\$193,311



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Program take-up in comparison to the number of residents that fall within the low income cut-off is included in Schedule B.

In 2019, Council approved a budget of \$134,000 to provide financial assistance to Milton families. The significant increase in applications for financial support over the last 3 years has led to a review of the program policy and operating processes. The review focused on effective supports for Milton residents with economic need, efficient processing of applications and adding clarity to the eligibility criteria.

As an early outcome of the review, a new on-line application and approval process has been introduced which has led to efficiency, improved convenience and enhanced service to residents.

#### Discussion

The Town is one avenue for residents to explore if financial need is a barrier to participation in recreation. Other programs Milton residents may qualify for to access financial support for recreation activities include the following: Ontario Works, Ontario Disability Support and Child Care Subsidy. Families seeking support for community sport programs can also make application to KidSport and the Jump Start Canadian Tire Foundation.

The intent of this policy is to provide a mechanism to support Milton families with economic need that a) express desire to participate in Town recreation programs and b) cannot afford the approved municipal user fees. The updated policy (Schedule A) is recommended to replace Corporate Policy 156 – "Fee Assistance" with changes reflecting practices that have been implemented over the last 10 years while recognizing the municipality's ability to support this increasing community need in relation to other municipal services.

The policy will continue to utilize Statistics Canada's Low Income Cut-offs, Before Tax (LICO-BT) as the measure for financial eligibility. The current table is included on Schedule C and Statistics Canada may update it from time to time.

#### Policy Changes

The existing policy specified the program would serve a maximum of 125 residents per year and once the maximum was reached, waitlists would commence and the policy would be reviewed. Since 2011, the investment of municipal funding has exceeded budget projections. Staff have reported these variances to Council through the regular reporting process. To date, the Town has supported all residents who have qualified for financial support.



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Should Council want to consider implementing a financial cap for this program going forward, staff will report back with recommended options to change the program's eligibility criteria and/or funding levels prior to the 2020 operating budget deliberations.

Changes in the policy and associated impacts are outlined on Schedule D. Among other amendments, the policy now provides access to all Milton residents including refugees and landed immigrants and addresses income verification.

#### **Financial Impact**

The revised policy ensures that any resident who is eligible for the Town's Financial Assistance program will be approved following submission of a complete application package including the required supporting documentation. This approach ensures the objectives of the program are achieved as outlined in the Policy's guiding principles. Variances between the budgeted and actual cost of the financial assistance program will therefore occur, and will be managed in accordance with section 4.6 iv (b) of Town Policy 113: Financial Management – Budget Management.

Respectfully submitted,

Joy Anderson Director, Culture & Community Investment

For questions, please contact:

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#### Attachments

Schedule A: Financial Assistance Policy Schedule B: Financial Assistance Utilization as a % of Low Income Population Schedule C: Statistics Canada Low Income Cut-offs – Before Tax Table Schedule D: Summary of Policy Changes

CAO Approval William Mann, MCIP, RPP, OALA, CSLA, MCIF, RPF Chief Administrative Officer

POLICY: Financial Assistance	POLICY NO.: 156
SECTION:	NO. OF PAGES: 4
EFFECTIVE DATE: April 16, 2019	REVISED: April 15, 2019

#### 1. Purpose

This Financial Assistance Policy (the "Policy") is designed to support Milton families with economic need that express desire to participate in Town recreation programs and cannot afford the approved municipal fees.

#### 2. Definitions

<u>Dependent</u> (in relation to the applicant/recipient)

- A person who resides in the same dwelling place and is
- i) the spouse of the applicant or recipient
- ii) a dependent child of the applicant/recipient or their spouse
- iii) a dependent adult of the applicant/recipient or their spouse

Dependent Child - a person under 18 years of age

Low Income Cut-offs, Before Tax (LICO-BT) - measurement of income level at which families or persons not in economic families spend 20 percentage points more than average of their before tax income on food, shelter and clothing. LICO's reflect a consistent and well-defined methodology that identifies those who are substantially worse off than average. (Source: National Household Survey Dictionary, Statistics Canada)

<u>Town Recreation Programs</u> - programs offered by the Town of Milton Community Services Department.

#### 3. Scope

This policy defines the eligibility criteria for residents to access the Town's Financial Assistance program and the eligible uses of approved funding.

#### 4. Guiding Principles

- 4.1. The Town as a place of possibility believes all residents should have the opportunity to access recreation programs.
- 4.2. Participation in recreation programs connects residents; in turn helping to build a connected community.
- 4.3. Town User Fees are based on market conditions and affordability for the majority of residents.
- 4.4. Limited resources means that not all residents with financial need will be served

with the Town's financial assistance program.

- 4.5. The Town provides a recreation program mix that includes some low cost opportunities to allow residents to pursue an active lifestyle (e.g. recreational swims / skates, walking tracks)
- 4.6. The Policy is intended to help those in greater need to receive support for some recreational activity.

### 5. Policy

The Town recognizes the benefits of participation in recreation programs. Residents who meet the eligibility criteria outlined in this policy are able to receive a maximum of \$200 per individual per calendar year. This assistance provides the opportunity to participate in Town recreation programs.

#### 5.1. Applicant Eligibility

- a) Financial eligibility is determined based on LICO-BT as established by Statistics Canada.
- b) Families who receive financial support for child care and recreation activities from Halton Region are able to use those Regional funds to access Town recreation programs for their children. Adult members of these families are eligible to receive financial assistance from the Town of Milton for Town recreation programs. Children may also be eligible to receive funds from the Town's financial assistance program for Town recreation programs not covered by the Region's Child Care Subsidy program.
- c) To qualify, an applicant must:
  - a) be a Milton resident
  - b) submit a complete application form
  - c) have a total gross household income below the LICO-BT
  - d) provide proof of annual income for all adults in the household
  - e) provide proof, if requested, that all dependent children are the legal responsibility of the adult applicant and reside at the applicant's home

#### 5.2. Documentation Requirements

To assess applicant eligibility requirements, this section details the types of documentation the Town will request.

- a) Proof of residency may be requested in the form of an original document that includes the individual's name and mailing address. Examples include, but are not limited to a recent utility bill, lease agreement, mortgage statement, or driver's license.
- b) Proof of annual income includes most recent Canada Revenue Agency Notice of Assessment, Ontario Works (OW) or Ontario Disability Support Program (ODSP) income statement.
- c) Should the applicant proof noted in 5.2.b) not be available, two consecutive current pay stubs will be requested.

- d) Proof of dependent children may be requested in the form of an original document that includes the individual's name and same mailing address as the applicant. Examples include, but are not limited to an Ontario Health Card, Canadian Pension Plan statement, Canada Revenue Agency Notice of Assessment, Canada Child Benefit statement, proof of guardianship.
- e) In the event the applicant is a refugee or landed immigrant within one year of the date of application, a copy of the Confirmation of Permanent Residence or Immigration Papers issued by the Government of Canada for each family member will serve in place of proof of income and proof of dependents.
- f) The procedures for gathering and recording the information outlined in this policy will reflect the confidential nature of the material and comply with applicable legislation, including the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

## 5.3. Recreation Program Eligibility

Applicants who meet the eligibility criteria are able to direct their approved funds towards Town recreation programs.

## 6. Financial Management

- 6.1 In alignment with the guiding principles of this policy, residents who satisfy all of the eligibility requirements of this policy will be provided with financial assistance up to the annual limit as outlined in Section 5.
- 6.2 Variances between the annual budget and the cost of the fee assistance program will be managed in accordance with section 4.6 iv (b) of Town Policy 113: Financial Management Budget Management (as may be amended from time to time)
- 6.3 Where the required annual budget increases significantly exceed a reasonable approximation of inflation and/or population growth, proposed budget revisions to the financial assistance program will be highlighted to Council through the annual budget process.

## 7. Program and Policy Management

- 7.1 The Director, Culture & Community Investment, or designate, is responsible for establishing procedures to implement this policy, monitoring outcomes and ensuring compliance, and as such is authorized to take necessary action to give effect to this policy.
- 7.2 The Director, Culture & Community Investment may in extenuating circumstances make exceptions to Section 5 above in approving an application.
- 7.3 The Commissioner, Community Services is delegated the authority to make administrative changes to this policy that may be required from time to time based on legislative changes, changes to staff roles impacting the administration of the policy, Council decisions, or if, in the opinion of the Commissioner, Community Services and the Director, Culture & Community Investment the changes do not impact the intent of the policy.

# **COMS-005-19 Schedule B**: Financial Assistance Program Utilization as a % of Low Income Population

To add further perspective to the degree to which the Town's Financial Assistance program has successfully reached the intended residents, the following graph relates the program take-up to the estimated number of Milton residents that fall within the low income cut-off as defined by Statistics Canada. The figures show that program utilization has grown during the four year period, with a higher utilization rate within the youth category.



#### COMS-005-19 Schedule C Statistics Canada Low Income Cut-offs Before Tax Table

Low income cut-offs (LICOs) before and after tax by community size and family size, in constant dollars 1 2 3 4 Occasional Table: 11-10-0195-01 (formerly CANSIM 206-0092) Geography: Canada

		Canada	
		Low income cut-offs after tax, 1992 base 2 4	Low income cut-offs before tax, 1992 base 3 4
Community size 5	Family size	1976 to 2017	1976 to 2017
		2017 constant dollars	
Population 30,000 to 99,999	person	17,536	21,687
	2 persons	21,344	26,997
	3 persons	26,577	33,190
	4 persons	33,157	40,298
	5 persons	37,757	45,705
	6 persons	41,874	51,548
	7 persons or more	45,989	57,392
Population 100,000 to 499,999	person	17,758	21,822
	2 persons	21,612	27,165
	3 persons	26,912	33,396
	4 persons	33,575	40,548
	5 persons	38,232	45,988
	6 persons	42,400	51,868
	7 persons or more	46,568	57,747

#### Footnotes:

1 Source: Income Statistics Division, Statistics Canada

The low income cut-offs after tax (LICO-AT) are income thresholds below which a family will likely devote a larger share of its after-tax income on the necessities of food, shelter and clothing than the average family. The approach is essentially to estimate an income threshold at which families are expected to spend 20 percentage points more than the average family on food, shelter and clothing, based on the 1992 Family Expenditures Survey. LICOs are calculated in this manner for seven family sizes and five 2 community sizes.

The low income cut-offs before tax (LICO-BT) are income thresholds below which a family will likely devote a larger share of its before-tax income on the necessities of food, shelter and clothing than the average family. The approach is essentially to estimate an income threshold at which families are expected to spend 20 percentage points more than the average family on food, shelter and clothing, based on the 1992 Family Expenditures Survey. LICOs are calculated in this manner for seven family 3 sizes.

4 Because this table is in constant dollars, the same low income cut-offs apply to all years.

Rural areas: includes communities with a population of less than 1,000 or with a population density less than 400 persons per square kilometer that are located outside Census metropolitan areas (CMAs) or Census agglomerations (CAs). Population under 30,000 : CAs below 30,000 and population centres below 10,000 persons. Population 30,000 to 99,999 : CAs between 30,000 and 99,999 persons. Population 100,000 to 499,999: CMAs between 100,000 and 499,999. Population 500,000 and over: CMAs 5 with 500,000 or more persons.

How to cite: Statistics Canada. Table 11-10-0195-01 Low income cut-offs (LICOs) before and after tax by community size and family size, in constant dollars https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110019501

#### COMS-005-19 Schedule D Summary of Policy Changes

Recommended Change	Current Policy	Change Rationale	Impact
Eligibility of the Applicant			
<ol> <li>Income verification: Proof of income before taxes is required for all adults in the household.</li> <li>Acceptable documentation:         <ul> <li>Canada Revenue Agency Personal Income Tax Notice of Assessment</li> <li>Ontario Works (OW) Statement of Deposit</li> <li>Ontario Disability Support Program (ODSP) income statement</li> </ul> </li> <li>If there is legitimate reason that these documents are unavailable,</li> <li>two consecutive current pay stubs</li> </ol>	<ul> <li>Applicants are to provide recent official documentation to support net income.</li> <li>Acceptable documentation:</li> <li>recent Notice of Assessment from Revenue Canada</li> <li>Ontario Disability Support Program (ODSP) income statement</li> <li>two consecutive current pay stubs</li> </ul>	This change will update acceptable income verification documentation.	This change will update policy to match current practice.
<ol> <li>Confirmation of permanent residency or immigration for recent refugees or landed immigrants.</li> </ol>	Not included in previous policy.	Refugees and immigrants arrive in Milton without any form of income or employment and are trying to integrate their families into the community. Proof of permanent residency or landed immigration papers confirm recent immigration within the first year prior to being able to provide proof of income.	This change will update policy to match current practice.

Changes being recommended in the policy include:

Recommended Change	Current Policy	Change Rationale	Impact	
<ol> <li>Dependents under the age of 18 can receive financial assistance.</li> <li>.</li> </ol>	Dependents under the age of 18 were ineligible.	This wording has been confusing for applicants and staff. Children are eligible to receive support, however, based on the assessment criteria, a person over the age of 18 must make application on their behalf.	This change will increase clarity.	
<ul> <li>4. Students living in Milton registered in full time or part time studies at a university or college can receive financial assistance.</li> <li>.</li> </ul>	Students registered in full time or part time studies at a university or college were ineligible.	More students are staying home and commuting to post- secondary institutes. Participation in recreation often becomes a low priority due to school expenses, especially if the family is below the low income cut-off.	This change will update the policy to match current practice.	
Recreation Program Access				
5. Applicants who meet the eligibility criteria are able to direct their approved funds towards Town recreation programs of their choice.	Some recreation programs were previously ineligible based on specialized instruction and delivery costs.	In keeping with the policy guiding principles, all recreation programs should be accessible to residents. Note: The Financial Assistance program is a support and not intended to cover complete costs.	This change will update the policy to match current practice.	

#### COMS-005-19 Schedule D Summary of Policy Changes

Recommended Change	Current Policy	Change Rationale	Impact
Program Administration			
6. All eligible applicants receive assistance.	Fee assistance is capped based on a specified number of applicants/budget availability, with a waiting list developed once limit is reached.	The revised structure is appropriate given the guiding principles and objectives of the policy.	Budget variances will occur and be managed in accordance with section 4.6 iv (b) of Town Policy 113.
7. The Director, Culture & Community Investment, or designate, is identified as being responsible for establishing procedures to implement this policy, monitoring outcomes and ensuring compliance, and as such is authorized to take necessary action to give effect to this policy	Separate detailed sections were included in the policy with respect to: - Administration - Application Process - Monitoring Process - Communication Plan - Training & Development - Staff Roles and Responsibilities	Transition the language included to policy considerations while allowing procedural and administrative protocol to be established and managed by the responsible program areas.	Will allow for greater flexibility in amending procedures to provide for program needs & evolving conditions, and achieve efficiency & effectiveness within the confines of the policy framework.

#### COMS-005-19 Schedule D Summary of Policy Changes