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**ONTARIO FEDERATION OF
INDIAN FRIENDSHIP CENTRES**



**Submission to Employment and Social Development Canada on the
National Aboriginal Resource Allocation Model (NARAM) Review**

March 2014

OFIFC SUBMISSION TO EMPLOYMENT AND SOCIAL DEVELOPMENT CANADA ON THE NATIONAL ABORIGINAL RESOURCE ALLOCATION MODEL (NARAM) REVIEW

INTRODUCTION

In preparation for the future of Aboriginal labour market programming beyond 2015, Employment and Social Development Canada (ESDC) is reviewing the National Aboriginal Resource Allocation Model (NARAM). The NARAM is used to allocate funding to Aboriginal Skills and Employment Training Strategy (ASETS), the objective of which is to increase Aboriginal participation in the Canadian labour market. The NARAM is based generally on labour market variables and Aboriginal population figures, with some variances for different aspects of the fund, including the urban population.

Post-2015 renewal of Aboriginal labour market programming must meet the needs of urban and off reserve peoples, including those without status, or affiliation to other First Nation, Métis or Inuit ASETA holders, at levels that are appropriate and effective based on current day statistics and population rates. The current NARAM was developed in 1999, using data from the 1996 Census. When ASETS was established in 2010, funding was allocated based on the NARAM using the 1996 Census – data that will be more than twenty years old when ASETS sunsets in 2015 – and as a result, the population demographics of the urban Aboriginal and off-reserve population in Ontario are not adequately acknowledged.

ESDC is reviewing the NARAM and engaging stakeholders to ensure the future allocation model reflects the current Aboriginal population needs while taking into account current labour market information. As the youngest and fastest growing demographic in Ontario, the Aboriginal population, particularly the urban Aboriginal population, has changed significantly since the 1996 Census. By not accurately acknowledging the increase in urban and youth populations, the fundamental needs of the Aboriginal population will not be met through the NARAM as it currently stands.

The Ontario Federation of Indian Friendship Centres (OFIFC) is submitting this response based on our experience as an ASETS Agreement holder since its inception in 2010 and our role in supporting urban Aboriginal people through front line, wholistic service delivery at the community level.

ABOUT THE ONTARIO FEDERATION OF INDIAN FRIENDSHIP CENTRES

Founded in 1971, the OFIFC is a provincial urban Aboriginal organisation representing the collective interests of twenty-seven member Friendship Centres located in towns and cities across Ontario. The vision of the Friendship Centre movement is:

To improve the quality of life for Aboriginal people living in an urban environment by supporting self-determined activities which encourage equal access to and participation in Canadian Society and which respects cultural distinctiveness.

The OFIFC continues to advocate on behalf of member Friendship Centres across all levels of government in key policy and program areas in order to advance the priorities and needs of urban Aboriginal communities in Ontario. Currently, the OFIFC administers a number of culture-based programs which are delivered by local Friendship Centres in the areas of health, justice, children and youth, family support, and education. Friendship Centres also design and deliver local initiatives in areas such as employment readiness, literacy, and cultural awareness.

OFIFC programs are wholistic and are designed to support urban Aboriginal people in each area of the Lifecycle Responsibility Medicine Wheel, which details the traditional roles of every

member of a community from infant to grandparents and Elders, creating a safe space for all community members who access Friendship Centres. Friendship Centres function as a central hub of social service provision in communities across Ontario and their programming is essential to the wellbeing of whole communities. This model of wellbeing is upheld through programming that guides children and youth to make healthy lifestyle choices, provides parents with supports, and connects young people with Elders to ensure that cultural teachings are honoured and passed on.

Today the Friendship Centre movement represents the most significant off-reserve Aboriginal service infrastructure across Ontario and Canada; dedicated to achieving greater participation of urban Aboriginal peoples in all facets of society, inclusive of First Nation – Status/Non-Status, Métis, Inuit and people who identify as Aboriginal.

THE OFIFC HISTORY OF ASETS

The OFIFC has been an independent ASETS Agreement holder delivering the Apatisiwin program since the inception of ASETS in October 2010. Prior to that, OFIFC delivered employment and training programming in partnership with Grand River Employment and Training under AHRDS II under the banner of O-GI, OFIFC-GREAT Initiative since 1998-99.

As a result of the 1998-99 call for proposals to provide service to Aboriginal clients in urban and off-reserve areas, two AHRDAs were negotiated in Ontario including the OFIFC's agreement. At the time, urban funding was distributed among the regions following a formula based generally on labour market variables and on the total Aboriginal population off reserve and outside of Inuit communities, with minor exceptions.

At the time, Ontario's portion of the National Urban Aboriginal allocation was determined to be approximately \$6.2 million annually, comprised of \$3.1 million EI Part II, \$2.1 million in Consolidated Revenue Funds (CRF), and \$1 million in Youth funds, which was intended to represent a highest share, at almost 21 per cent. However, it was not reflective of the actual urban Aboriginal population in Ontario at the time, which was closer to 48 per cent. Ontario has always had, and continues to have the highest numeric Aboriginal population in the country. To accommodate the two agreements, the Service Canada Ontario Region was able to secure and convert an additional \$3 million annually in EI part II program dollars from within the mainstream regional allocation. The transition from AHRDS to ASETS in 2010 resulted in a status quo transfer of \$13.4M. The urban funding envelope remained the same. Ontario Region Service Canada was again able to stabilize the conditional additional historical funding pressures in place within the regions until 2015.

As a result of these urban investments, the OFIFC administers the Apatisiwin program in 26 urban, rural and remote Aboriginal communities, through 21 Friendship Centres and five Delivery Sites. Apatisiwin is a Swampy Cree word that means employment and jobs. Apatisiwin is the largest network of employment and training services for the growing urban Aboriginal population in Ontario. Since 2010, Apatisiwin has supported approximately 2000 people to find employment and returned approximately 1400 to school. In 2012-13 Apatisiwin provided services, including funded, non-funded and drop-in service to 12,000 urban Aboriginal people. Part of the success of Apatisiwin in Friendship Centre communities is the availability of wrap around, wholistic services that provide clients and participants with access to health, social and family services while they benefit from employment, education and training supports. With a \$6.4 million allocation provided each year, Apatisiwin employs 42 full-time employees across 25

urban centres, with eight Apatisiwin-funded positions employed by the Ontario Federation of Indian Friendship Centres.

Over the last 15 years, the OFIFC's demonstrated strengths in administering ASETS include:

- Experience with delivery and support of the largest network of ASETS delivery sites in Ontario;
- Extensive knowledge of Friendship Centre mechanisms and relationships;
- Strong provincial presence and proven results in administering complex programming;
- Existing relationships with ESDC, AANDC, and relevant Ontario ministries; and
- Policy capacity support to Friendship Centre ASETS programming in the areas of advocacy, relationship development, and analysis of local and provincial trends, issues and challenges.

THE CHALLENGES AND POTENTIAL OF URBAN ABORIGINAL COMMUNITIES IN ONTARIO

For over forty years the OFIFC has worked towards advancing urban Aboriginal social justice issues with all levels of government. Today, Friendship Centres continue to play a crucial role in advocating for, and supporting, urban Aboriginal people. It is in large part due to such efforts that a proportion of urban Aboriginal people now make up middle income earners in the province of Ontario¹ – a rather recent phenomenon that must be both sustained and increased. While the upward socio-economic mobility of a segment of the urban Aboriginal community represents an impressive milestone, the realities faced by a far larger proportion of urban Aboriginal families reflect the policies of a government that fails to meet the needs of urban Aboriginal communities and threatens to further erode supports through austerity measures.

Increasingly, the Aboriginal population is becoming more urbanized. According to the 2006 Census, 80.4 percent of Ontario's Aboriginal population lives off-reserve with 62.1 percent living in urban areas.² Further, this urban Aboriginal population is young and growing during a time when the Ontario population is aging. In fact, urban Aboriginal youth are recognized as the fastest growing population in Ontario – 48 percent of Aboriginal people in Ontario are under the age of twenty-four.³ Additionally, more than 100,000 Aboriginal youth will come of age to enter the labour market by 2026.⁴ This represents the largest population of urban Aboriginal people in the country and the highest numeric number of urban Aboriginal population.

The facts surrounding this young and growing population in Ontario are of critical importance when assessing Ontario's evolving labour market needs. In 2007, Statistics Canada defined the before-tax low-income cut off (LICO) 'poverty line' for a single person living in a major city as \$21,666. Urban Aboriginal people in Ontario earn lower incomes (\$28,000 compared to \$38,000), and have lower educational attainment (67 percent completed high school compared to 78 percent; 9 percent completed Bachelor's degree or above compared to 21 percent) than the non-Aboriginal population.⁵ As such, over one in four (29 percent) urban Aboriginal families lives below the LICO and over one-half (53 percent) of single urban Aboriginal people live below

¹ In 2007, more than 22 percent of Urban Aboriginal Task Force (UATF) respondents belonged to the middle class. OFIFC, OMAA and ONWA (2007). *Urban Aboriginal Task Force (UATF) Final Report*. Toronto, Ontario: 91. Available at <http://www.ofifc.org/pdf/UATFOntarioFinalReport.pdf>

² Statistics Canada. (2006). *2006 Census*.

³ Government of Ontario, *Breaking the Cycle, Ontario's Poverty Reduction Strategy*, 2008, p15

⁴ Government of Canada. (2008). Hope or Heartbreak: Aboriginal youth and Canada's future. *Horizons: Policy Research Initiative*, 10(1), 42.

⁵ Ministry of Aboriginal Affairs. (n.d.) *Urban Aboriginal People*, p. 2. Available at: <http://www.aboriginalaffairs.gov.on.ca/english/services/datasheets/urban.pdf>

the LICO.⁶ With a high school education becoming the bare minimum for employment in today's labour market, urban Aboriginal people have higher unemployment rates than their non-Aboriginal counterparts (12 percent compared to 6 percent).⁷ Additionally, Aboriginal people in Ontario are also more likely to be employed in precarious employment, including part-time, contract, and seasonal work – 30.5 percent of Ontario's Aboriginal population work part-time or only part of the year.⁸

However, as the urban Aboriginal population continues to grow, the non-Aboriginal population is aging and Ontario is facing a potentially debilitating labour force and skills shortage. In his 2010 report *"People Without Jobs – Jobs Without People: Ontario's Labour Market Future"*, Rick Miner indicated that Ontario's future labour force will be based on a knowledge economy requiring higher education past high school and predicted a shortfall of 200,000 (minimum) to 1.8 million (maximum) in workers by 2031.⁹ Additionally, a report entitled *"Urban Aboriginal Communities in Canada – Complexities, Challenges, Opportunities"* estimates that by 2015, 55 percent of all jobs will require post-secondary education, 25 percent will require a high school diploma, and only 7.6 percent will require less than high school.¹⁰

While the young and growing urban Aboriginal population has the potential to contribute to Ontario's labour force needs on a significant level, resources and programs must be available and targeted to meet their needs. The different levels of government must collaborate effectively on an efficient way to support urban Aboriginal communities.

The overwhelming majority of Aboriginal people in Ontario live off-reserve and in urban centres where a wealth of opportunity for success exists, but greater supports need to be more readily accessible to improve outcomes. This demographic reality coupled with the growing urban Aboriginal youth population necessitates strategic inter-governmental collaboration, which includes the community, in efforts to support the future success of urban Aboriginal community members.

⁶Peter Dinsdale. (March 9, 2010). National Association of Friendship Centres, Presentation to Best Start Conference. Available at: <http://beststart.org/events/detail/poverty/Peter%20Dinsdale.pdf>

⁷Ministry of Aboriginal Affairs (2009). *Urban Aboriginal People: Ministry of Aboriginal Affairs Quick Facts, 2009*. Available at: <http://www.aboriginalaffairs.gov.on.ca/english/services/datasheets/urban.asp>

⁸ Ontario Trillium Foundation. *Aboriginal Communities in Profile*, p. 31. Available at:

http://www.otf.ca/en/knowledgeSharingCentre/resources/Aboriginal_Profile_Ontario.pdf

⁹ Rick Miner. (2010). *People Without Jobs – Jobs Without People: Ontario's Labour Market Future*, p. 1.

http://www.minerandminer.ca/data/CO_PeopleWithoutJobs_Brochure2010.pdf

¹⁰ Spence, N., Wingert, S., and Jerry White. (2011). "The Economic Development Capacity of Urban Aboriginal Peoples," in Dinsdale, P., White, J., & Hanselmann, C. (Eds.) *Urban Aboriginal Communities in Canada: Complexities, Challenges, Opportunities*, p. 93.

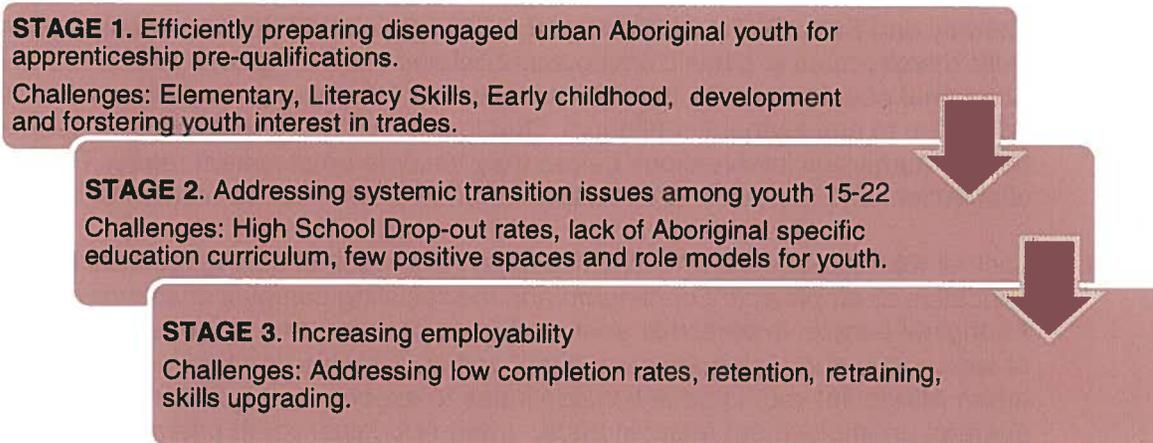
OUR POSITION

THEME 1 - ADDRESSING TODAY'S LABOUR MARKET NEEDS

1. *What are the primary labour market needs for Aboriginal people, based on your experience?*

The primary labour market needs for urban Aboriginal people accessing Friendship Centre services are mainly in the areas of pre-employment, job readiness, and literacy and basic skills. Urban Aboriginal people experience significant challenges along the education to employment continuum, which for many people begins in the early school years and is compounded by years of systemic discrimination.

Figure 1 – A Staged View of the Education to Employment Continuum



The gaps experienced within this results in lower rates of education and complex barriers to sustainable employment. Consequently, many urban Aboriginal people accessing Apatisiwin need pre-employment services, literacy and basic skills programming.

The International Adult Literacy Skills Survey indicates that almost half of Canadian adults do not possess level 3 literacy skills – the minimal level for working in today's complex knowledge and information economy.¹¹ However, recognizing this, urban Aboriginal people score significantly lower than non-Aboriginal people in literacy testing.¹² For urban Aboriginal people, the effect of low literacy and basic skills can be substantial on their ability to complete training and obtain employment, but it can also lead to difficulties during initial intake procedureds for pre-employment, education, and employment and training programs.

A significant level of emphasis should be placed on essential skills/pre-employment to ensure that clients can move on to demand-driven skills training. This point has come up repeatedly in engagement with Apatisiwin sites and in the engagement with the Ontario Ministry of Community and Social Services on social assistance transformation.

¹¹ Ontario Federation of Indian Friendship Centres (2007). *Family Literacy in Ontario Friendship Centres*. Available from <http://www.fsin.com/healthandsocial/childportal/images/Family%20Literacy%20Report%20OFIFC.pdf>

¹² Building On Our Competencies – Canadian Results of the International Adult Literacy and Skills Survey 2003 – Statistics Canada, Catalogue no. 89-617-XIE.

2. *Based on your experience, what are the top three employment barriers that affect the ability of Aboriginal people to prepare for, find, and keep jobs?*

Urban Aboriginal people, including people who live off-reserve and non-status people of indigenous ancestry, face considerable challenges when entering and remaining in the Ontario labour force. The challenges experienced along the education to employment continuum (Figure 1) include low educational attainment, low retention rates in trades and apprenticeships as well as more systemic challenges, namely, racism and lack of cultural understanding. As such, it is important to understand barriers to employment as intersecting, complex webs consisting of various interrelated factors.

Based on the OFIFC's experience, three of the barriers that negatively influence employment outcomes for urban Aboriginal people are:

- i. **Literacy and Basic Skills:** As discussed in the previous question, pre-employment skills development is a basic employment-related need for growing numbers of urban Aboriginal people resulting from the complexity of the barriers experienced along the education to employment continuum. Due to this, many urban Aboriginal people require numerous interventions before they become employment ready. The distribution of resources and development of services must be mindful of this fact.
- ii. **Lack of work experience and qualifications:** As a result of disengagement from the education to employment continuum and the resulting complex challenges, urban Aboriginal people, in particular youth, often do not have the necessary qualifications or work experience to obtain meaningful and sustainable employment. The growing urban Aboriginal youth population continues to experience significantly higher than average unemployment rates; in 2009, urban Aboriginal youth unemployment was 26.6 percent compared to 17.4 for their non-Aboriginal counterparts. Leaving high school or post-secondary education without critical work experience perpetuates the no experience-no job cycle as employers prefer to hire individuals with demonstrated work experience. However, the current Youth allocation under ASETS does not allow Apatisiwin to meet the youth demand for employment supports.

The labour market in Ontario is transitioning into a knowledge economy in which the majority of new jobs require some level of post-secondary education. It is estimated that by 2015, 55 percent of all jobs will require post-secondary education, 25 percent will require a high school diploma, and only 7.6 percent will not require a high school diploma.¹³ In order to obtain sustainable employment, urban Aboriginal people need increased access to the proper qualifications and training, which in many cases is 2-4 year college or university programs. However, ASETS does not currently cover education of this type, focusing rather on short-term training.

- iii. **Lack of meaningful employment opportunities:** The effects of systemic racism and prejudice present a significant barrier to the employment of urban Aboriginal people. To date, there has been little effort from governments to address racism in coordinated and comprehensive ways. While the OFIFC has developed and delivers Aboriginal Cultural

¹³ Spence, N., Wingert, S., and Jerry White. (2011). "The Economic Development Capacity of Urban Aboriginal Peoples," in Dinsdale, P., White, J., & Hanselmann, C. (Eds.) *Urban Aboriginal Communities in Canada: Complexities, Challenges, Opportunities*, p. 93.

Competency Training to mainstream organizations, the failure to address racism against Aboriginal people in a broad manner has a major impact on Aboriginal economic participation.

The prevalence of racism and discrimination in urban centres is a significant problem that compounds the other systemic barriers to employment, including housing, education and mental health. The importance of racism as a significant barrier to inclusion of Aboriginal people in the economy cannot be underestimated. In urban areas, this racism is considered by Friendship Centres to be the single biggest overall challenge to Aboriginal participation in educational and economic activity.

Despite the tremendous efforts put forward by Apatisiwin sites and their clients to overcoming individual and personal challenges, one factor that cannot be addressed through client-focused training and interventions is the employment/employer environment/landscape in Ontario. Racism is highly experienced in educational and workplace settings, where negative stereotypes of Aboriginal people and culture have serious repercussions on self-esteem and identity. Also, racism, discrimination, and stereotypes can result in employers not wanting to hire Aboriginal people. This is especially detrimental in northern and smaller communities or communities with declining industries. Without appropriate responses and interventions to address and eliminate racism and discriminatory attitudes and values in the employment landscape, including attitudes about gender, language and geography, training efforts will not result in the expected outcomes.

Without a coordinated and strategic approach to address racism, it will be extremely difficult to address many of the main challenges in improving economic outcomes for Aboriginal people.

3. a. *Which of these variables are still relevant in terms of determining funding needs, and why?*

The variables outlined continue to be relevant in determining funding needs for urban Aboriginal people using the NARAM. Further, other factors should be considered and are detailed in the subsequent question.

- **The number of people not in the labour force, plus unemployed individuals:** larger proportions of the Aboriginal population are unemployed or not actively engaged in the labour force due to the complex barriers they experience. Additionally, they have an increased likelihood of employment in seasonal and contract work or to stay at home to look after their children due to the inaccessible cost of childcare in many urban communities. The OFIFC does not benefit from federal childcare resources through FNICC. Additionally, urban Aboriginal people have lower health status and experience long-term disabilities, physical and mental, that limit their ability to work.
- **Working age population:** Ontario has a larger working age Aboriginal population (ages 15-59) than the other provinces and territories, thus having a population who requires supports now. According to the 2006 Census, 65 percent of Ontario's Aboriginal population was working age in comparison to the national average of 62.6.¹⁴ Further,

¹⁴ Statistics Canada. (2006). *2006 Aboriginal Population Profile*.

some provinces and territories have significantly lower working age populations than the national average, for example Saskatchewan working age population comprises only 58.7 percent of the total Aboriginal population.¹⁵

- **Number of people without employment income:** The rate at which Aboriginal people continue to lack employment income remains relevant and is pertinent when quantifying other variables, such as single parent status. Additionally, we must consider the significant role that volunteerism plays in the urban Aboriginal community. The *Urban Aboriginal Task Force (UATF)* reported that half of the respondents volunteered within the urban Aboriginal community.¹⁶ It is important to recognize the importance of these contributions to both the development and maintenance of healthy urban Aboriginal communities.
- **Number of unemployed youth:** This variable continues to be increasingly critical as the urban Aboriginal population is younger and growing at a rate faster than the non-Aboriginal population. Statistics Canada projects that from 2001 to 2026 the Aboriginal youth population, aged 15-19, will have grown by 37 percent compared to a 6 percent growth rate for non-Aboriginal youth.¹⁷ Further, Aboriginal youth in Ontario aged 15-29, once comprising 25 percent of the Ontario Aboriginal population¹⁸ are now estimated to comprise 48 percent of the Aboriginal population. However they continue to experience significantly higher rates of unemployment or underemployment, lower rates of educational attainment, and increased barriers to employment. This segment of the Aboriginal population are in need of increased employment supports to ensure that they successfully transition into meaningful and sustainable employment, however the current funding allocated under the NARAM in youth funds do not adequately meet the demand and are regularly exhausted.
- **Education levels:** this factor is important considering the need for literacy and basic skills among urban Aboriginal people accessing Friendship Centre services and seeking employment in Ontario. This factor should thus inform the funding allocations based on the increased need for educational supports, upgrading and or LBS services required by urban Aboriginal people in Ontario.
- **Single Parent status (lone parent):** Approximately 35 percent of urban Aboriginal families are headed by a single parent, most commonly by a single mother.¹⁹ Single parent status exacerbates the effects of poverty and increases the barriers to employment, particularly the cost of childcare. Children who are raised by single parents also have lower rates of educational attainment, higher rates of unemployment, and earn lower wages when they transition into adulthood.
- **Limited working knowledge of English/French (Aboriginal Mother Tongue):** This factor is relevant because it informs the level of language training required for urban Aboriginal requiring language supports. Language supports that increase proficiency in

¹⁵ Ibid.

¹⁶ OFIFC, OMAA and ONWA (2007). *Urban Aboriginal Task Force (UATF) Final Report*, p.153. Available at: <http://www.ofifc.org/pdf/UATFOntarioFinalReport.pdf>

¹⁷ Statistics Canada. (2012). "A Statistical Snapshot of Youth at Risk and Youth Offending in Canada." Retrieved from: <http://www.publicsafety.gc.ca/res/cp/res/ssyr-eng.aspx>

¹⁸ Statistics Canada. (2006). *2006 Aboriginal Population Profile*.

¹⁹ Statistics Canada (2011), 2011 National Household Survey retrieved from <http://www12.statcan.gc.ca/nhs-enm/index-eng.cfm>

English and French increase urban Aboriginal people's success in procuring and maintaining employment. Additionally, the low levels of literacy, experienced by a greater proportion of the urban Aboriginal population, negatively impact their ability to maintain employment and to advance their career once employed.

That being said, Aboriginal people want greater access to learning Aboriginal languages, which increases their cultural identity and ability to engage in training, education and employment. In fact, the Urban Aboriginal Task Force reported "lack of identity" as the greatest socio-economic challenge experienced by urban Aboriginal youth.²⁰ The lack of cultural identity makes it difficult for urban Aboriginal people to foster positive Aboriginal identities, which impacts their educational achievement, transition to employment, and retention within employment.

- **Geographic Location:** This factor will continue to be relevant due to the differences among regions in Ontario that impact access to services and supports for urban Aboriginal people. Geographic differences in Ontario, such as northern Ontario versus southern Ontario, often translates into the need for different levels of support and increased costs associated to the provision and access of services.
- **Youth Incarceration rates:** The youth age range of the Aboriginal population in Canada is experiencing the highest rate of growth, which mirrors the age that youth become most at-risk of involvement in the justice system, statistically speaking. As such, the rate of youth incarceration and risk of justice involvement will be a relevant factor well into the next decade.

But incarceration rates alone do not accurately reflect the rate at which Aboriginal youth are becoming involved with the justice system and recent changes to the Youth Criminal Justice Act, under Bill C-10, have made police records-keeping more stringent. This variable should reflect the realities faced by Aboriginal youth as well as changes to the legislative landscape governing youth justice. The variable should be extended further to include youth who become justice-involved and receive charges and warnings, but are not incarcerated. There are circumstances where individuals are denied employment because their record check is not clear due to incidents where police were involved but no tickets were issued or charges laid. With the passing of Bill C-10, the police are now required to keep a record of any and all extrajudicial measures prescribed to a young person and this file is forwarded to the RCMP to contribute to their criminal record if charges are laid.²¹ This issue affects Aboriginal youth at a disproportionate rate as Aboriginal people are more likely to come in contact with the police due to systemic racism and high levels of poverty.

Furthermore, involvement with police and the justice system as a youth can be predictive of future justice involvement and higher risks of incarceration as an adult, when the justice system becomes more punitive. A persistent barrier to employment and job experience among urban Aboriginal youth is a criminal record and the inability to provide

²⁰ OFIFC, OMAA and ONWA (2007). *Urban Aboriginal Task Force (UATF) Final Report*, p.125. Available at: <http://www.ofifc.org/pdf/UATFOntarioFinalReport.pdf>

²¹ Library of Parliament. (2012). *Bill C-10: An Act to enact the Justice for Victims of Terrorism Act and to amend the State Immunity Act, the Criminal Code, the Controlled Drugs and Substances Act, the Corrections and Conditional Release Act, the Youth Criminal Justice Act, the Immigration and Refugee Protection Act and other Acts*. Publication No. 41-1-C10-E, p. 134. Retrieved from <http://www.parl.gc.ca/Content/LOP/LegislativeSummaries/41/1/c10-e.pdf>

a clear CPIC and/or afford to pay for pardons for minor offenses. For example, the fees for pardons increased from \$150 to \$631 in February 2012.

- **Prior experience in the child welfare system:** Prior experience in the child welfare system increases the number of complex barriers urban Aboriginal face when accessing education and employment. According to the 2011 National Household Survey, 48.1 percent of children in foster care are Aboriginal,²² and while there is no definitive breakdown between on- and off-reserve, urban service providers indicate an over-representation of Aboriginal children.²³

Urban Aboriginal people with prior experience in the child welfare system are less likely to attend post-secondary and require additional supports in the areas of pre-employment, training and employment. This factor continues to remain relevant in the allocation of funds using NARAM due to the increased need for wraparound services and supports for urban Aboriginal people with prior engagement in the child welfare system.

b. Are there other variables that should be included in an updated funding allocation model?

In order to accurately reflect the current demographics of the Aboriginal population in Ontario, the following variables should also be included in an updated funding allocation model:

- **Size of urban population:** Ontario has the largest Aboriginal population, 21 percent of Canada's total, and according to the 2006 Census 80.4 percent live off-reserve.²⁴ The updated funding allocation model should take this into account by allocating funding in direct proportion to population size and services required. Ontario's portion of the National Urban Aboriginal allocation has been maintained at approximately \$6.2 million annually since the late 1990s and is not reflective of the significant pressures and changes in urban population and demographics since that time. The fact that Service Canada Ontario Region secured an additional \$3 million annually from mainstream regional allocations for urban Aboriginal ASETAs signals and acknowledges the need for increased allocation specific to urban Aboriginal people under the NARAM.
- **Adult incarceration rates:** In addition to youth incarceration, Aboriginal adults are justice-involved at higher proportions (five to six times more likely) than their non-Aboriginal counterparts.²⁵ Adults, like youth, who are justice-involved also experience significant barriers to employment, including challenges with CPICs.
- **Homelessness and Unstable Living Situations:** Urban Aboriginal people are disproportionately represented in the homelessness population, in many urban centres 25-50 percent of the homeless population is Aboriginal.²⁶ Further, greater proportions of

²² Statistics Canada. (2013). *2011 National Household Survey: Aboriginal Peoples in Canada: First Nations People, Métis and Inuit*, p. 2. Retrieved from <http://www.statcan.gc.ca/daily-quotidien/130508/dq130508a-eng.pdf>

²³ National Collaborating Centre for Aboriginal Health. (n.d.). *The Health of Aboriginal People Residing in Urban Areas*, p. 17. Retrieved from http://www.nccah-ccnsa.ca/Publications/Lists/Publications/Attachments/53/Urban_Aboriginal_Health_EN_web.pdf

²⁴ Statistics Canada. (2006). *2006 Census*.

²⁵ Canadian Council on Social Development. (n.d.). *Social Challenges: The Well-being of Aboriginal People*. Available at: http://www.ccsd.ca/cpsd/ccsd/c_ab.htm

²⁶ 2005. Sider, Deb. A Sociological Analysis of Root Causes of Aboriginal Homelessness in Sioux Lookout, Ontario. (The Canadian Race Relations Foundation) p. 23. Available at: <http://www.crr.ca/divers-files/en/pub/rep/ePubRepSioLoo.pdf>

urban Aboriginal people live in overcrowded housing or live in highly mobile situations (i.e. staying with various friends or relatives for short periods of time) due to lack of affordable housing and poverty. In fact, it is estimated that 22 percent of off-reserve Aboriginal households are in core housing need, including overcrowding.²⁷ Homelessness and unstable housing presents a multitude of barriers to accessing employment services, obtaining employment, and completing training, in addition to applying for and receiving social assistance.

- **Non-EI Eligibility:** EI Part II funds constitute half of funding allocated to urban ASETAs under the NARAM. Additionally, the additional \$3 million annual funding secured by Service Canada Ontario Region is EI Part II funds converted from the regional mainstream allocation. However, in comparison to the rest of Canada, Ontario has a lower share of unemployed people receiving EI benefits (26.6 percent compared to 45.2 percent).²⁸ Moreover, a greater proportion of urban Aboriginal people are on social assistance and experience long-term unemployment or are employed in part-time, precarious, or seasonal employment and do not qualify for EI. As a result, CRF and Youth funds are in higher demand than EI Part II funds among Apatisiwin clients. The NARAM must be representative of the unemployment and employment trends present within the urban Aboriginal community.
 - **Addictions and Mental Health:** Employment has been found to have a positive effect on health, in particular mental health. However, mental health is a significant barrier to completing training and accessing and retaining employment; requiring increased supports and wraparound services to obtain successful outcomes. Urban Aboriginal youth and adults experience a higher proportion of mental health problems, including Fetal Alcohol Spectrum Disorder, addiction, and depression. Individuals with mental disabilities experience increased discriminatory hiring practices and inaccessible or inflexible workplaces due to stigmatization and lack of awareness around mental health among employers.
- c. *Assuming that a new model retains the approach of allocating funding to designated geographic areas, are there other ways to distribute funding that would be more effective than by province/territory?*

It is critical to thoroughly account for the current demographics in the review of the NARAM to accurately reflect the Aboriginal population and meet this population's training and employment needs. Ontario not only has the largest percentage of Aboriginal people in Canada, the demographics of this population differ substantially from the rest of the provinces and territories.

In Ontario a greater proportion of the Aboriginal population lives in urban centres and off-reserve as compared to the rest of Canada. Based on 2006 Census data, 80.4 percent Ontario's Aboriginal population lives off-reserve and 62.1 percent live in urban areas – 6 percent higher than the national average.²⁹ Additionally, as aforementioned under the review

²⁷ OFIFC, OMAA, and ONWA. (2007). *Urban Aboriginal Task Force: Final Report*, p. 137. Available at: <http://www.ofifc.org/pdf/UATFOntarioFinalReport.pdf>

²⁸ MTCU. (n.d.). *Canada-Ontario Labour Market Agreement 2012-13 Annual Plan*. Available from: http://www.tcu.gov.on.ca/eng/training/labmark/LMA_Plan2012_13.html

²⁹ Statistics Canada. (2006). *2006 Census*.

of variables, a greater percentage of Ontario's urban Aboriginal population is currently of working age, which results in a higher need for training and employment supports.

As a result of the use of out-of-date census data, the current NARAM does not adequately meet the employment and training needs of urban/off-reserve Aboriginal people. Further, ASETAs working with these populations are disproportionately underfunded and struggling to meet their needs. However, in the development of the both AHRDS and ASETS the employment and training needs of the urban and off-reserve Aboriginal population were clearly not met under the NARAM funding distribution. As a result, Service Canada Ontario region secured and converted \$3 million annually in EI part II program dollars from within the mainstream regional allocation. This funding was necessary to help cover the pressures not accommodated under the \$6.2 million annual Ontario portion of the National Urban Aboriginal Allocation under both ASETS and its predecessor AHRDS. It is also important to consider that the Apatisiwin serves the Aboriginal population on a status blind basis, and often serves First Nation clients who are eligible for services through other ASETS agreement holders; however, non-status Urban Aboriginal clients do not have access to services provided by First Nations ASETS. Recognizing the significant proportion of the Aboriginal population in Ontario who live off-reserve, in addition to clients who may live on-reserve but can access the urban allocation, it will remain critical to maintain a specific urban allocation from the national total and to take into account the large urban/off-reserve population.

The province of Ontario is comprised of vastly different economic regions, which presents challenges in allocating funding by province/territory. Each community and region provides different labour market or training opportunities and challenges. The northwest, including Red Lake, Dryden and Fort Frances, is experiencing an increase in the mining sector, construction and fluctuating lumber/paper markets. This area continues to be in a state of transitions and reinventing opportunities. Northern sites can be isolated as in the case of MoCreebec, where there presents a smaller client base, higher costs and limited training and or employment opportunities. Near-north regions, like Sudbury and Sault Ste. Marie have a mixture of knowledge economy and natural resource extraction with each sector being heavily specialized while the southern regions, spanning from Windsor to Niagara seem to have a larger base for opportunities in training and employment that are demand driven.

Lastly, the OFIFC again encourages new funding approaches under the next agreement to address the imbalance of the current funding model and better meet the growing and unmet demand for additional Consolidated Revenue Funds (CRF) and Youth funds. The CRF and Youth allocations must be increased or EI allocations must be re-profiled in a future agreement to meet the real and growing needs in urban Aboriginal communities. The CRF and Youth allocations are tapped in every community, which is telling of an ongoing need for increased youth supports. Further, the UATF found that there are very few employment and training programs for urban Aboriginal youth that lead to opportunities to successfully enter the labour market,³⁰ and this is compounded by the inadequate funding allocated to Youth under ASETS. This need for increased youth supports will continue to be of critical importance given the demographics of urban Aboriginal communities.

³⁰ OFIFC, OMAA, and ONWA. (2007). *Urban Aboriginal Task Force: Final Report*, p. 23. Available at: <http://www.ofifc.org/pdf/UATFOntarioFinalReport.pdf>

THEME 2 - ALIGNING FUNDING WITH PROGRAM PRIORITIES

1. a. *What are some strategies for linking employer demand with the skills and training needs of Aboriginal clients, and how can funding be targeted to support these strategies? (Demand-Driven Skills Development)*

The current concept of demand-driven skills development is limited and limiting, and does not actually respond to the demand of clients, but is focused on the demand of employers. While this is not unreasonable, the labour market interventions could better balance the availability of interventions that directly impact employers as well and services that respect and meet the demand of Apatisiwin clients and communities.

The current imbalances in linking employer demand with skills training for urban Aboriginal people result from multiple challenges. First, there is a significant need for effective institutional transitions from education to employment. For instance, in many Friendship Centre communities, there is a notable lack of established networks and channels between educational institutions and employers. Friendship Centres in Sudbury and Timmins have described this as a lack of communication between educational institutions and employers, which often results in training that is not matched to current labour market demand. As a result, there are many circumstances in which individuals complete training but are not able to obtain employment.

Second, there is a lack of regional and local labour market information (LMI), which presents challenges in projecting local employment opportunities. With the discontinuation of Service Canada's local labour market monitors, there is currently very little local disaggregation of data in Ontario. LMI information is critical to job matching and training by labour market intermediaries and for recruitment and training by employers. Apatisiwin Employment Counsellors and Career Developers have firsthand knowledge and experience in local demand-driven training and labour market information. These positions within Friendship Centres provide information through quarterly reporting that assists and informs the OFIFC of current labour and training demands within communities. However, it remains challenging to stay current on the shifting labour market trends across the province on a regular basis. Additionally, without local LMI, the distinct regional labour market differences in Ontario make provincial level data difficult to use in projecting community-specific job openings or skills shortages. Thus, it makes it difficult to plan policies and programs at the local level.

Commonly, there are misperceptions, particularly among urban Aboriginal youth, of what job opportunities are in demand in their communities, partly due to the lack of LMI. Further, urban Aboriginal youth sometimes lack awareness regarding admission requirements to post-secondary programs and the skills or education required for different careers, in particular math and science credits. As such, many youth do not have the necessary credentials to pursue post-secondary education and training, including trades and apprenticeships.

- b. *Are there options for distributing funding that will support the leveraging of available resources? (Partnerships with Public/Private Sector)*

Relationships and partnerships with private sector businesses and industry are critical for advancing the strategic goals of the Friendship Centres. To be effective, these relationships must be built over the long term. A trusting relationship needs to be developed for the

establishment of formal and mutually beneficial partnerships and a strong urban Aboriginal labour force requires community support. These relationships take significant time and human resources to come to fruition.

Notable impediments to partnership building are a lack of knowledge from local employers about the services that Apatisiwin offers, and not having a clear understanding of what partnership means in regards to programming and business, or the ability to see mutual benefits in partnering with Apatisiwin. Increased engagement will raise awareness about the role of Friendship Centres, Apatisiwin, and the current urban Aboriginal demographic in light of forecasted labour shortages. However, Friendship Centres, and non-profits in general, are consistently being asked to do more with funding levels that have remained stagnant and based on out of date demographics. As such, 17 Apatisiwin sites operate with only one Employment Counsellor, while 9 sites have an additional Career Developer position. With the current workloads and responsibilities of Employment Counsellors to clients and administrative duties, there are limited opportunities to do community outreach, marketing, networking and job development activities.

To improve employment outcomes and ensure the needs of the Aboriginal labour force are met within regional employment and training strategies, Apatisiwin needs increased human resources to reach out to employers, Workforce Planning Boards, Economic Development Councils, and Chambers of Commerce, among others. Flexibility in existing funds would also enable Apatisiwin to engage employers and training institutions on issues of racism and lack of cultural spaces without specific client interventions. As previously mentioned, the systemic racism experienced by urban Aboriginal people is a main barrier to completing education and obtaining employment.

Additionally, the structure of the ASETS program also discourages partnerships between ASETAs. Specifically, the limitation of only being able to report one SIN result per year causes competition amongst employment and training service providers locally, which defeats the purpose of partnerships and leveraging of existing resources.

One proven model of program delivery that has directly improved access to opportunities and employment outcomes for urban Aboriginal people since the 1990s is the OFIFC's Alternative Secondary School Program (ASSP). The ASSP supports disengaged learners to complete their Ontario Secondary School Diploma and provides opportunities for urban Aboriginal youth, who would otherwise be pushed out of the secondary school system to gain the skills, knowledge and credentials to gain meaningful employment or continue on to postsecondary education. Resources for the ASSPs are currently provided through the Ontario Ministry of Education for eleven sites located in Friendship Centres where the schools are co-operated by Local District School Boards. Building upon and leveraging the existing resources and infrastructure of the Alternative Secondary School Program in Friendship Centres will continue to contribute to increased educational attainment for urban Aboriginal youth, and even some adult learners. Each year, approximately 1000 learners are enrolled in the ASSP. With the proven model, available infrastructure, expertise of local Friendship Centres and support of the OFIFC, this is an option where additional resources could leverage upon existing programming with tremendous results.

*c. Should the number of successful employment outcomes (i.e. number of clients who obtain employment) in each region be a factor in deciding where funding is directed?
(Accountability for Improved Results)*

Funding should continue to be based on need and on up-to-date demographics, not “successful” employment outcomes. Based on the question being posed here, it is unclear what would qualify as successful employment outcomes; for example, would it include return to school or number of interventions required.

While the primary focus for OFIFC’s employment and training programming has always been getting clients into jobs, every client is not fully job ready and many have multiple barriers, which require a greater investment of time and money to prepare them to job ready status. Friendship Centres invest a significant portion of their resources in providing a suite of services and support at the local level that can successfully support the longer term transitioning of clients into employment and they often deal with a full spectrum of clients, e.g. EI, Social Assistance, Youth, Persons with Disabilities and multi-barrier clients compared with most other employment organisations. Directing funding based on ‘successful’ employment outcomes could negatively impact the people who need the most support and might force ASETAs to focus on clients they consider to be the most job ready in order to achieve higher results. This also does not account for sustainable employment over time, and simply reflects completed interventions that result in a job.

The implication that accountability for improved results simply means more employment outcomes does not account for whether or not the approaches used promote sustainable and long term employment results. It is critical to ensure that ASETAs is assisting urban Aboriginal people to transition into sustainable employment and not just simply into precarious employment.

Additionally, if the funding was directly based on successful employment outcomes in each region, the OFIFC would be impacted based on how other ASETAs are performing. This approach would, in effect, promote data tunnel vision and not client needs.

*d. Are there options for distributing funding that will support capacity building?
(Accountability for Improved Results)*

Funding should continue to be distributed to support existing infrastructure in urban Aboriginal communities, such as Friendship Centres. For the past 15 years, the OFIFC has demonstrated strengths within Aboriginal labour market programming, including the development of partnerships and accountability in administering complex programming. However, not uncommon to the non-profit sector but essential nonetheless, salaries and benefits for Apatisiwin Employment Counsellors have not had increases since the beginning of this agreement, and for many Employment Counsellors hired during AHRDS there has been no increases for over a decade despite the rising costs of living. In order to maintain our valuable workforce into the next agreement, we must be able to offer competitive salaries that attract and retain staff with the skills, knowledge and experience to administer and deliver this program and who can perform at the high level of capacity required under ASETAs protocols and procedures. Considerations must also be made to the cost and time related to Financial Administrators, Bookkeepers and other supporting positions that make delivery of Apatisiwin possible in so many communities.

As indicated earlier in this submission, since 2010, Apatisiwin has supported more than 2000 people to find employment and returned 1400 people to school. Additionally, in 2012-2013, Apatisiwin provided services to 12,000 urban Aboriginal people. While these numbers

are substantial, it is necessary to be able to attract and retain qualified front-line staff in order to further improve outcomes and successfully meet the needs of urban Aboriginal people.

In the first two quarters of 2013-14 alone, Apatisiwin has generated 139 returned to school and 245 employed outcomes through the provision of minimum levels of service, or non-funded interventions. This speaks to the importance of having a skilled service provider located in the Friendship Centre who can offer the basics on a regular basis: counselling, support, advice and guidance to those seeking access to the education to employment continuum. This is not to suggest that intervention funds are not greatly required, but the evidence speaks for itself on the positive impacts of having a full-service employment program within a Friendship Centre who creates the space for job seekers to come in and take the first or next step to employment. Moving into the next agreement, OFIFC would like to be able to place additional Employment Counsellors in urban communities, including sites with multiple Apatisiwin staff to address high levels of service demand as required.

THEME 3 - SIMPLIFYING THE MODEL

1. *Should the same funding model used at the national level be used at the sub-regional level, in order to bring consistency to the funding distribution? Or, is a variety of sub-regional allocation models needed to account for regional circumstances? Please explain below.*

The current labour market needs and economic landscapes vary significantly across the country; further, they vary significantly across the regions within Ontario itself. Therefore, the OFIFC does not support the use of the same funding model at the national level and the sub-regional level. This would not bring consistency, due to the vast differences and it would overlook the complexities of the issue rather than address them. However, the sub-regional funding distribution model in Ontario should also be revised to ensure that the current demographics and labour market needs of the Aboriginal population are accounted for and that the urban Aboriginal population is adequately reflected in funding allocations.

ADDITIONAL COMMENTS

The questions posed in this questionnaire were often vague and/or posed in an attempt to illicit a specific response. Wherever possible, the OFIFC has attempted to outline the circumstances under which we are responding to these questions. We trust that the additional information and explanations provided in answering the questions will be taken into account.

The OFIFC would like to express concern regarding which statistics will be used in the NARAM review. While there is a need to update the current statistics, comparisons between data sets will prove difficult considering the different collection methods used from 2006 to 2011 by Statistics Canada.

CONCLUSION

Through this submission the OFIFC has highlighted critical elements that must be taken into consideration in the re-development of the NARAM to ensure that funding allocations meet the needs of the urban Aboriginal community. Further, this submission has emphasized that ASETAs, such as the OFIFC, require adequate funding to provide the necessary employment

and training supports to meet the needs of the urban Aboriginal community and is reflective of the current population, social and economic demographics.

The OFIFC again reiterates that the urban allocation must be increased to meet the needs of this growing population. As such, the OFIFC encourages new funding allocation approaches that recognize the regional differences of Ontario. Included in these differences are the economic/employment landscapes, the higher proportion of urban Aboriginal people, and the need to address the current imbalance of the NARAM funding allocations for CRF and Youth. Until these variables are accounted for in a meaningful way, urban Aboriginal people in Ontario will continue to experience insufficient and ineffective employment and training supports.

With increased allocations to meet growing urban demands, the existing infrastructure of the Friendship Centres in Ontario and their proven capacity in providing culture-based, wholistic services is well placed to continue to support urban Aboriginal people in accessing employment and training supports. An updated funding formula under the NARAM will not only enhance the ASETA's capacity to provide effective, wrap-around employment and training services, it will also help meet the community identified needs and address the multitude of barriers to employment experienced by the urban Aboriginal community.

