



December 3, 2021

Honourable Mitzi Dean
Ministry of Children & Family Development
PO Box 9724 Stn. Prov Govt
Victoria, BC V8W 9S2

RE: MCFD System Changes for Children and Youth with Disabilities

Dear Minister Dean,

We (the undersigned) cumulatively represent 34 BC-based organizations, as well as clinicians, researchers, and businesses with hundreds of years of combined experience supporting tens of thousands of children and youth with disabilities and complex needs. We are jointly writing this letter to express our concerns with the Ministry of Children and Family Development's (MCFD) sudden decision to transform the existing support network for children and youth with disabilities to a system of generalist hubs while simultaneously eliminating individualized funding.

As a group, we are certainly pleased to hear that MCFD is committed to ensuring all children will finally have equitable access to disability supports and services—including those who live outside major population centres—and that this support will be available with or without a diagnosis. Collectively, we agree that the current system is in dire need of change, particularly when it comes to ensuring equitable and adequate funding for all neurodivergent and disabled children. There are currently far too many underserved individuals, families, and communities throughout BC. We share MCFD's ambition to reach these populations with essential services that are necessary for all children, youth, and families in this province to thrive.

Though we represent different disabilities and diverse approaches to supporting children, youth, and families, we are in broad agreement on what we believe are shortcomings in MCFD's process and proposed plan for Family Connection Hubs.

There has been an acute lack of meaningful engagement and collaboration with our community regarding changes to the Children and Youth with Support Needs (CYSN) Framework. Although MCFD claims to have conducted consultations prior to announcing the new system, none of our organizations were invited to or included in these discussions in any meaningful way, if at all. The announcement of these major funding changes has caught the majority of BC's disability community by surprise, as the [recent statement from the Representative for Children and Youth also describes](#). As you know, the First Nations Leadership Council does not support the changes you have announced, nor the process you have undertaken. Consultation with Indigenous leaders and communities is necessary to reconciliation [given the disproportionately high rates of Indigenous children and teens in MCFD's foster care system](#).



There continues to be a lack of transparency about the changes to the CYSN Framework. The initial announcement included big promises but few details. Subsequent information releases have failed to reveal further insight into how the hubs will provide **more** support compared to the current system. Like Dr. Jennifer Charlesworth, we are especially concerned with the lack of clear plans to significantly increase funding or increase the number of service providers within the proposed hub model. Since the funding change announcement, all of our organizations have been inundated with questions from concerned parents and community members—questions that we can't answer due to the scarcity of information from MCFD. Unfortunately, this lack of transparency and clarity continues even after information sessions were held this week for families, service providers, and sector partners.

Changes to the CYSN Framework should be guided by principles such as flexibility, choice, equity, access, cultural safety, trauma-informed practices, empowerment, and dignity. As disability organizations, we know from experience how vital it is for families to have agency and autonomy over the services their children receive and the supports they need. These benefits are a critical element that is missing from the proposed plan. For this reason, a hybrid model would better meet families' diverse circumstances by allowing a variety of ways to access services, funding, and support, avoid disruption of already established supports and minimize the need to jump through unnecessary hoops or seek additional diagnoses. Rather than minimizing the role of diagnosis, waitlists for diagnostic assessment must be shortened to a maximum of three months and efficiencies in the public assessment system must be created. Additionally, eligibility must be streamlined for **all** disabilities, ensuring all children receive time-sensitive early intervention supports during their most critical years of development, even while waiting for a diagnosis. Families shouldn't have to prove that they deserve financial, social, and political support for their disability-related needs, nor should they have to continuously prove need or eligibility when their disability is genetic or lifelong.

There is also much concern about the proposed needs-assessment tools. More robust consultation needs to be done to ensure that the tools being used to assess needs will not cause harm or exclude children and families from supports and services they need. We feel that assessors should not serve as gatekeepers but instead open the door to exceptional support for all children and youth who need it. We are concerned the hubs will not accomplish the latter.

Supporting all children will require accurate data on the number of children and youth that require supports. The province has not shared a true reflection of the population that will be served. While the government speaks of serving an additional 8,300 children, we know that is not an accurate number representing the need. Thus, service providers and modelling are needed to understand the full extent of this gap today and in the future.

Currently, there are not even enough service providers to meet the needs of all children and youth currently accessing CYSN services. We need more pediatricians, speech-language pathologists, occupational therapists, physical therapists, psychologists, behaviour analysts, and other support professionals who work directly with children with disabilities throughout the province. Without more of these essential professionals and access to services, especially

in rural communities, supports will remain constrained with or without a hub system. Service providers with unique expertise in a specific disability or support need represent one of the province's most valuable assets. These specialists have the knowledge and experience to offer targeted, individualized support that cannot be matched by a hub that caters to all disabilities. Families are deeply concerned that they will receive generic services at a hub that lack this depth of knowledge about their child's specific disability. We also can't assume that all service providers will be culturally safe for all children, youth, and families. Families must have the option to choose service providers to build on strengths and prevent harm and trauma. This may require them to be at arms-length from MCFD.

As concerned stakeholders, we share the objectives that the proposed MCFD plan intends to achieve, especially in terms of supporting families that are underfunded or completely without government funding. We particularly welcome the objective of guaranteeing support for those without a diagnosis. Therefore, a hub system may be an appropriate complement in creating a hybrid system that maintains individualized funding for the families for whom it's already working and expands this option to include all families as a choice. To this end, MCFD must invest substantially more funding into the CYSN Framework to meet the needs of all children and youth with support needs and to avoid reproducing the pitfalls of the Ontario model, in which [50,000 children await access to promised needs-based supports](#).

We call on MCFD to immediately extend more funding to all children with disabilities, with or without a diagnosis. A failure to do so will continue to push unfunded families beyond their breaking points.

We also call on MCFD to immediately engage and collaborate with the undersigned in the restructuring and decision-making process of the proposed service system.

Respectfully,

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