



UNIVERSITY OF
CALGARY

School of Public Policy

Nunavut Income Assistance

Patterns of Use and Recommendations for Reform

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Dr. Gillian Petit and Dr. Lindsay M. Tedds
School of Public Policy, University of Calgary

Molly Harrington
Victoria, B.C.

Contact Authors

Dr. Lindsay M. Tedds
Associate Professor, Economics
Scientific Director, Fiscal and Economic Policy, School of Public Policy
University of Calgary
906 8th Avenue S.W., 5th floor
Calgary, Alberta
T2P 1H9
lindsay.tedds1@ucalgary.ca

Dr. Gillian Petit
Research Associate, Fiscal and Economic Policy, School of Public Policy
University of Calgary
gillian.petit@ucalgary.ca

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Executive Summary

In this report, we conduct a detailed review of the Income Assistance program in Nunavut to identify a suite of evidence-based reforms that, if implemented together, would move the IA program radically towards a program for Inuit by Inuit grounded in Inuit values, Inuit Qaujimajatuqangit (IQ) principles, and basic income principles.

Our set of 23 recommendations, summarized below, combine short-term measures to reform the current Income Assistance program using a diverse set of tailored policy approaches that fall in nine key areas:

- Legislative reform through consultation
- Reforms to empower Income Assistance officers and workers to support clients
- Continued improvement of the “one client, one Plan” approach to IA delivery
- Improving access to disability designation and supports
- Modernizing financial eligibility criteria
- Re-envisioning productive choices
- Improving IA benefits
- Supporting hunters
- Supporting youth and young adults

The intent of these recommendations to re-imagine Income Assistance as a program for Inuit and by Inuit to help achieve the original vision of Nunavut. The authors of this report are not Inuit and thus do not have the lived experience of Inuit culture. Nevertheless, we believe it is important to acknowledge and center IQ principles to remind ourselves that these recommendations are not for ourselves.

While the transformation of IA may not be what some people consider a basic income, it can be seen as the initial steps on the path to a basic income. The administrative structure for income assistance already exists and it is a well-known program in Nunavut: there is no need to start from scratch and reforms could be quick to implement.

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Introduction

In our report entitled *Basic Income Design Options for Modelling* (Petit et al. 2022) we outlined that one pathway to a basic income is to transform and enhance the existing Income Assistance (IA) program in Nunavut. In this report, we conduct a detailed review of the Income Assistance program in Nunavut to identify a suite of evidence-based reforms that, if implemented together, would move the IA program radically towards a program for Inuit by Inuit grounded in Inuit Qaujimajatuqangit (IQ) and basic income principles.

The IA program is the largest cash transfer program delivered by the territory, with 25% of the population and 30% of the Inuit population receiving IA in any given month: it plays a key role in enabling and supporting access to resources in Nunavut. Despite recent changes to IA, it does not enable recipients to meet basic needs and continues to be inconsistent with both IQ and the basic income principles outlined in Tedds et al. (2021)—simplicity, respect, economic security, and social inclusion. The recommendations made in this report would radically move IA towards a cash transfer program that is holistic and supports becoming a capable and contributing human being, that is less stigmatizing and disrespectful, and moves away from its roots in colonial ideas that place primacy on the individual and wage employment.

This report builds upon work previously done by the Department of Family Services. In 2015/16, they extensively reviewed IA (Nunavut Department of Family Services 2016). In that report, it was clear that Nunavummiut wanted an income assistance program that provided better support, was easier to understand, and encouraged work, skill building, and traditional livelihoods—a simpler, more effective program consistent with Inunnguiniq, Pilimmaksarniq, and Pijitsirniq. The report made 20 recommendations, some of which have been acted upon. Our report builds on those recommendations, re-incorporating those that still require work and introducing new reforms to advance IA even further.

In Nunavut, IA is structured similarly to income assistance in the provinces but serves a fundamentally different population: a much larger proportion of Nunavut’s population, nearly all of whom are Inuit, rely on IA. Further, the current design and implementation of IA, as imported from the Northwest Territories, is not grounded in Inuit Qaujimajatuqangit, does not address tensions between wage employment and traditional activities, nor tensions between generations, nor the present and ongoing impact of colonialism. Income assistance cannot be imported into such a different setting and be expected to be successful in achieving its objective of “assisting” Inuit in becoming “self-sufficient” (IA Manual, p. 2).

The current IA program also does not reflect basic income principles: it is complex, benefits do not provide economic security for clients and its delivery does not support respect for recipients nor social inclusion. Economic security is lacking in large part because the basic allowance is far below any measurable poverty line for the territory, and the other benefit types (e.g., for utilities, fuel, housing, etc.) are not received by all casefiles. Features of IA, including how benefits are phased-out with earned income and the lack of respect in how the pursuit of traditional and caregiving activities are treated, cause recipients to be socially excluded and enhance tensions between wage employment and

traditional employment. The program does not provide the needed support for those who engage in unpaid work and traditional activities, not only because of the disrespect and tensions created, but also because benefit levels are inadequate.

Many advocates propose a basic income delivered via the tax system, but this is not the only way to administer a basic income. A basic income could be delivered through the existing IA infrastructure following significant reforms to IA that move it towards basic income principles. Further, some reforms to IA could be done quickly relative to the development and implementation of a tax-administered basic income, as the administrative structure for income assistance already exists and it is a well-known program in Nunavut and IA reforms do not necessarily require coordination with the federal government or federal institutions. Finally, administering a basic income through IA infrastructure and reform would allow for a more flexible support model: instead of a “one-size fits all” income support, wrap-around supports targeted to heterogenous needs could also be provided.

Reforms to IA that improve economic security (e.g., increased benefit levels, reduced monitoring that increases eligibility and take-up rates) will be the most challenging to implement because they will be the most expensive. These more expensive reforms will likely require significant trade-offs from the Government of Nunavut (GN) and/or increased financial support from the federal government.

Regardless, even if the GN elects to pursue a basic income delivered through the tax system in the medium to long term, reforms to IA should still be made in the short run to have an immediate impact on recipients’ lives.

Sources of Information for IA Review

In this report, we examine the Nunavut IA program, focusing on use, patterns, and trends. We use four sources of information: the IA Act, the IA Regulations, the IA policy manual— collectively the “authorities”— and Income Assistance data. We detail these below.

Income Assistance Authorities

In Nunavut, the Income Assistance program is offered and funded by the Government of Nunavut. It is administered by the Department of Family Services as set out in the Income Assistance Act (“Act”; R.S.N.W.T., 1988, c. S-10) and the Income Assistance Regulations (“Regulations”; R.R.N.W.T., 1988, c. S-16).¹ There is also an Income Assistance Manual (“Manual”) that is written by the Director and issued to IA caseworkers to be used as a directive.^{2,3} All of these sources of authority have changed and evolved over time. We examine these three sources of authority to understand, at least in theory, how the IA

¹ For this report, unless otherwise stated, we rely on the IA Act and IA Regulations current to August 2021 (and which were in-force at the time of writing).

² We rely on the Income Assistance Manual, Issue Date July 1, 2021, effective date July 1, 2021, corresponding with the Act and Regulations examined.

³ We are aware that as of Fall 2022, this Manual has been de-emphasized as a directive to be used by caseworkers. Despite this, we discuss the inconsistencies between the Manual and the Act and Regulations as the Manual was operational until recently and to highlight the reach of the authority of the Director (as per the Act).

program in Nunavut is expected to work. However, the actual practice of Nunavut IA may not correspond with the authorities as there is considerable discretion afforded to the Director and to IA workers. That is, not all IA regulations and manual directives may be followed at all times and implementation may vary across workers and, hence, applicants and recipients. Further, a reading of regulations and legislation is unable to provide insight into actual interactions between IA workers and applicants/recipients.

Data

In our review of Income Assistance in Nunavut, we rely on the IA authorities identified above as well as administrative IA data supplied by the Government of Nunavut for the year 2018.⁴ As this data has only ever been used for the purpose of administering IA, it is very raw data for the purposes of data analysis and lacks rigorous documentation. The authors of this report took great care in cleaning and interpreting the data, but it is possible that mistakes remain.

Once the data was prepared for analysis, there were 6,461 unique casefiles and 51,162 unique casefile-month observations for the year 2018. Not all these observations receive an IA payment; rather, they reflect the number of casefiles that are assessed for IA every month, whether they receive an IA payment or not (e.g., their income may be too high. We discuss this more below). Overall, there are 14,785 unique recipients (counting all persons in a casefile of all ages including dependent children) and 120,641 unique recipient-month observations for the year 2018—representing about 39% of Nunavut’s population in 2018.

As the data is only for the year 2018, when interpreting the data, we rely on IA authorities and regulations for the year 2018. There were several regulation changes in 2018 and there have been regulation changes since then (up to the time of writing in October 2022). Thus, it should be kept in mind when examining the data results that some of the patterns and trends seen in 2018 may not exist in 2022 and going forward. We highlight where we expect 2018 patterns and trends will be different for future years due to regulation changes.

Brief Background on Income Assistance in Nunavut

When Nunavut became a territory in 1999, the new territory adopted the income assistance legislation then operational in the Northwest Territories (NWT). The NWT legislation was originally drafted as the Social Assistance Act in 1988 and incorporated the Productive Choice Program in January 1997. Many of the features present in the NWT legislation are still observed in the Nunavut legislation today, with much of the same wording still intact, with minor modifications throughout the years.

⁴ 2019 was not used due to the ransomware attack that occurred in Nunavut in 2019. We chose not to use the years 2020 and 2021 as those are pandemic years and likely not reflective of normal operations.

While the current legislation does not explicitly state the purpose of IA, as with other income assistance programs in the southern provinces of Canada, IA has been interpreted by the Manual to be a program that “assist[s] individuals for as short a period as possible assisting them to move towards education or employment that will assist them to become self-sufficient” (Manual, Directive 001, p. 2). The Manual refers to IA as a “funder of last resort” (Manual, Directive 110, p. 93) as recipients are expected to first access all financial resources they may be eligible for before being extended assistance (Regulations, s. 1.1(2)(c.2)).⁵

Under the Act, a Director is appointed by the Minister (Act, s. 2) who, under the direction of the Minister, administers the Act and Regulations and must make provisions for assistance to persons living in Nunavut or who have left Nunavut pursuant to an agreement approved by the Director (e.g., for medical purposes; Act s. 3 & s. 5). As we will show, under the Regulations, the Director is granted a large amount of discretion in determining whether certain situations meet the expounded criteria. Much of this discretion is codified in the Manual.

Unlike other provincial income assistance programs, Nunavut IA is *only* an income assistance program: all eligible persons receive a “basic allowance” (or sundries allowance) plus the actual cost of some enumerated items and/or a top-up for various situations (e.g., disability, emergency, etc.). There are no “other” general supports or health supports associated with IA. In Nunavut, health supports (e.g., dental, vision, prescriptions, etc.) for persons without private insurance who are part of the Land Claims Agreement are provided by the federal government through Indigenous Services Canada.⁶ Other general supports that are sometimes available through income assistance programs in the provinces (e.g., helping with school start-up fees, employment start-up fees, etc.) do not appear to be available in Nunavut. In addition, in Nunavut there is only one IA program for everyone: there is no separate program for persons with disabilities. There is an “incidental allowance” for persons with (verified) disabilities, which is a small lump-sum top-up to the basic allowance (\$175/month - \$250/month). There are no additional supports for persons with disabilities.⁷

Another unique feature of Nunavut IA is that, aside from the basic allowance, IA payments are assessed based on the actual, proven need of clients. That is, IA payments cover the actual cost of specific items such as housing, utilities, fuel, education and training, and household furnishings and equipment. This is a unique feature of Nunavut IA; in the provinces, income assistance is generally provided as a lump-sum amount regardless of actual costs of living, with the exception of housing which is sometimes provided as a separate amount, though with a maximum amount that is often set much lower than the actual cost of housing, effectively becoming a lump-sum contribution for anyone renting.

⁵ Many of these Manual references are not aligned with the Act or Regulation, oftentimes interpreting the legislation in accordance with Western conventions that are contrary to IQ principles, and in some instances, potentially overstepping the legislation.

⁶ Many children in Nunavut would also qualify for coverage under the temporary Canada Dental Benefit that was launched on 1 December 2022.

⁷ Currently, the legislation pertaining to the proposed Canada Disability Benefit is being reviewed in the House and will go to third reading, likely in the new year. The Government of Nunavut may wish to work closely with the federal Minister responsible for this benefit to ensure that the implemented program is accessible by Nunavummiut.

Finally, persons receiving IA in Nunavut are expected to engage in a “productive choice” unless they are designated a person with a disability or are 60 years of age or older, in which case they are excused. Productive choices are defined by regulation. We examine these choices in more detail below.

Income Assistance: Patterns of Use and Trends

In this section, we provide a broad overview of IA in 2018, focusing on descriptive statistics and patterns of use, using the data discussed in the previous section. Where it makes sense, we first examine the relevant legislative authorities to help understand the context of the data. A “casefile” refers to, collectively, a head of household, their spouse/partner (if any), and dependent children (if any) all of whom are considered to be in the same household for the purpose of IA. A “recipient” refers to each individual in a casefile separately. Unless otherwise stated, we only examine casefiles that receive an IA payment: not all casefiles receive an IA payment every month despite appearing in the IA data (i.e., they are assessed but they are ineligible for or are refused assistance).

Descriptive Statistics

In this section, we examine how many people in Nunavut rely on IA and who uses IA in Nunavut. Table 1 provides descriptive statistics for IA casefiles and recipients who receive an IA payment averaged monthly.

From Table 1, we see that on average there are 4,074 IA casefiles that receive an IA payment per month and 99.9% of those are Inuit. The number of IA recipients is more than double that of casefiles: there is an average of 9,499 IA recipients per month. This suggests that in any given month in 2018, 26% of the population of Nunavut and 31% of Nunavut’s Inuit population received IA (Statistics Canada 2022b). This is much higher than, for example, in the province of B.C. where only about 4% of the province’s population receives IA (Green et al. Forthcoming).⁸ It is also important to stress here that nearly the entire IA caseload are Inuit.

Table 1 suggests that IA recipients are young. Dependent children made up, on average, 46% of all IA recipients per month in 2018.⁹ Senior recipients (i.e., persons over the age of 60), make up a very small proportion of IA recipients (1.3% on average). When examining the age of the head of the casefile, casefiles headed by a person under the age of 30 made up an average of 46% of all casefiles a month. Nunavut has a young population with high fertility rates (Tedds, Cameron, and Atherly 2021), but this is still an overrepresentation as those under 30 constitute only 36% of the population age 18-64.

Table 1 also suggests that despite an almost 50-50 split between men and women head-of-casefiles, women head-of-casefiles are much more likely to have dependents (and be single mothers) whereas men are more likely to be single adults with no dependent children. That is, on average, 72% of all

⁸ We often make comparisons with B.C. in this report as that is a province for which detailed information about Income Assistance caseloads exists because of the work of the BC Basic Income Expert Panel <https://bcbasicincomepanel.ca/>.

⁹ Dependent children may be dependent children ages 0-18 year or dependent adult children ages 19 to 24 years.

dependent child recipients are in a casefile headed by a woman, with the remaining 28% of dependent children in a casefile headed by a man. Furthermore, 88% of all single parents are women whereas 71% of all single adults (with no dependent children) are men.

Table 1

IA Monthly Descriptive Statistics, January 2018 – December 2018

	Mean (s.d)	Minimum	Maximum
Monthly Number of Casefiles	4,074 (243.1)	3,402	4,321
Monthly Number of Recipients	9,499 (715)	7,459	10,266
Size of Casefile	2.3 (1.8)	1	10
Recipient Type (Percent of Recipients)			
Dependent Child	46.3% (0.6)	45.0%	46.9%
Adult Age 18 – 59	52.4% (0.5)	51.8%	53.5%
Senior Ages 60+	1.3% (0.09)	1.2%	1.5%
Gender of Head of Casefile (Percent of Casefiles)			
Women	49.8% (0.96)	48.4%	51.4%
Men	50.1% (0.97)	48.6%	51.6%
Family Type (Percent of Casefiles)			
Single Adult with No Dependents	52% (1.4)	50.5%	55.6%
Single Women	15.1% (0.4)	14.4%	16%
Single Men	37% (1.1)	35.5%	39.6%
Single Parent*	23% (0.5)	22.0%	23.8%
Single Mother	20.2% (0.5)	19.2%	20.8%
Single Father	2.8% (0.2)	2.5%	3.1%
Couple with No Dependents	2.5% (0.2)	2.1%	2.8%
Couple with Dependents	22.5% (1.4)	18.5%	23.9%
Age of Head of Casefile (Percent of Casefiles)			
10 to 18**	6.9% (1.3)	5.0%	9.1%
19 to 24	22.9% (0.6)	22.2%	24.0%
25 to 29	16.5% (0.6)	15.6%	17.2%
30 to 39	22.6% (0.3)	22.1%	23.1%
40 to 49	16.5% (0.3)	16.0%	16.9%
50 to 59	12.2% (0.3)	11.7%	12.5%
60+	2.4% (0.1)	2.2%	2.7%
Ethnicity (Percent of Casefiles)			
Inuit	99.9% (0.03)	99.8%	99.9%

Source: Government of Nunavut (2022). Income Assistance Administrative Data. Calculations by authors.

Notes: Standard deviation in brackets.

*Although we refer to these persons as “single parents”, it is uncertain whether the dependent children in their household/casefile and their biological children. They may also be grandchildren and children they are the guardian of.

**It is more likely that these heads of casefiles are 18 years old; however, their exact ages are unknown.

Finally, Figure 1 shows a map of Nunavut with the percent of IA recipients and the percentage of the Nunavut population (Statistics Canada 2022b) per region and for Iqaluit (monthly, on average over 2018). Figure 1 shows that IA recipients are under-represented, as a portion of the population, in Iqaluit and Kivalliq and over-represented in Qikiqtaaluk (outside of Iqaluit) and Kitikmeot. That is, most IA recipients are in Qikiqtaaluk (47%), about the same proportion of the population,¹⁰ with, on average, 8%

¹⁰ Census 2021 put the population of Qikiqtaaluk at 19,355. The Nunavut population was 36,858 (Statistics Canada 2022a).

of IA recipients in Iqaluit. However, Iqaluit has 19% of Nunavut's population (Statistics Canada 2022b) suggesting that IA recipients in communities outside of Iqaluit but in Qikiqtaaluk are over-represented and Iqaluit is under-represented, again as a portion of the population. In the remaining regions, Kitikmeot has a higher proportion of IA casefiles than population, and, as such, is slightly over-

Figure 1

Distribution of IA Recipients by Region (and Iqaluit)

Source: Author rendering

represented in the IA recipients. Finally, the proportion of IA recipients in Kivalliq is about the same as the proportion of population in Kivalliq.

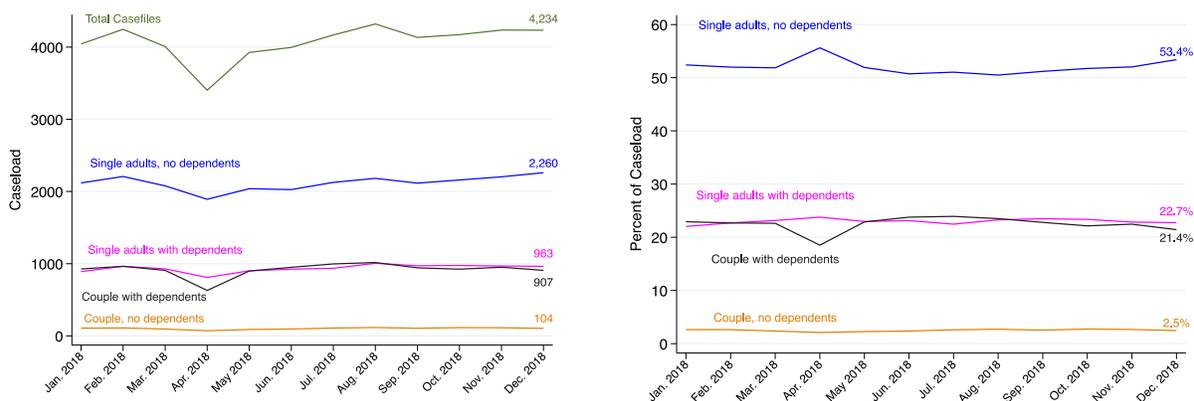
Casefiles by Family Type

Examining casefiles by family type from Table 1, we see that most casefiles are single adults with no dependent children (52%), with single men making up, on average, 37% of all casefiles per month and single women making up on average 15% of all casefiles per month. Single parents make up the next largest proportion of casefiles (23%), with single mothers and single fathers making up on average 20% and 3%, respectively, of casefiles a month. Couples with dependent children make up a similar proportion of casefiles as single parents (23%). Lastly, couples with no dependent children make up the smallest proportion of casefiles on average (3%).

Taking a deeper look at caseload by family type in 2018, Figure 2 plots the number of casefiles who receive an IA payment by family type (left panel) and the percent of casefiles who receive an IA payment by family type (right panel). From Figure 2, we see that for most of the year, the number of casefiles is

relatively constant. However, in April there was a decline in the caseload, with casefiles for couples with dependent children dropping by the largest amount. As we will show, this corresponds with the receipt of tax returns which, in 2018, were considered unearned income and applied against IA benefits,

Figure 2
IA Casefile by Family Type, January 2018 – December 2018



Source: Author calculations

reducing the IA benefit amount for those who received a tax return and making many IA casefiles ineligible for IA payments.¹¹

These trends are both similar to and different from the casefile proportions for B.C. IA: as in B.C., single men have the highest proportion of casefiles in Nunavut (Green et al. Forthcoming). However, in B.C., the percentage of single parent casefiles has declined over time so that by 2018, single parents made up a smaller share of casefiles than single women. While we only have one year of Nunavut IA data and cannot examine longer time trends, we can see that for Nunavut in 2018, single parents (particularly single mothers) make up a larger proportion of casefiles than single women, the opposite of B.C.. Further, in B.C., couples with dependent children comprise 8% of IA casefiles whereas in Nunavut, it is much higher (23%). This, combined with the high proportion of single parents and the high proportion of child recipients, suggests that income support programs targeting children’s poverty have not been as successful in Nunavut as they have been in the southern provinces.

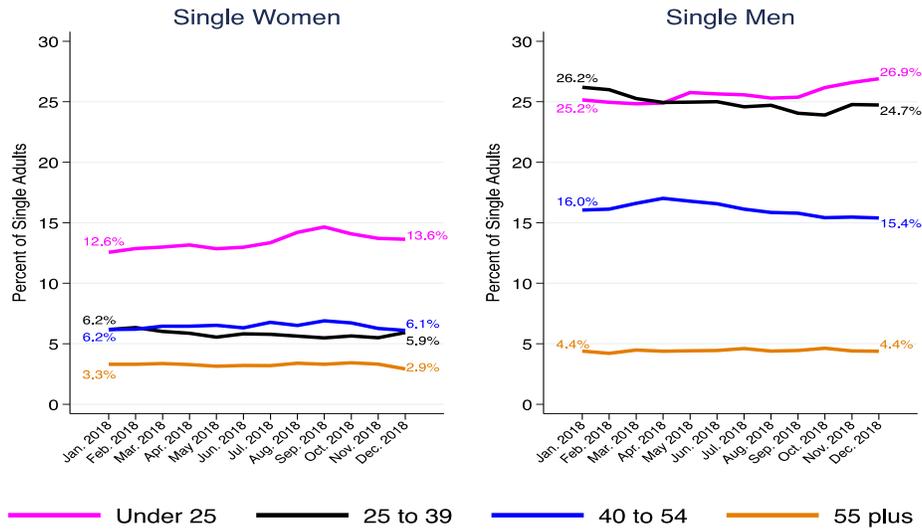
Single Adults

As single adults make up the majority of the IA caseload, in this section we dig deeper into them to understand their demographics. Figure 3 plots the percentage of single adults receiving IA by gender and age. It shows that, of single adults, single men ages 18 to 24 and ages 25 to 39 make up the largest proportion of the single adult caseload: single adults are more likely to be young men. Likewise, for

¹¹ Since July 2021, tax returns up to \$3,000 are included in exempted income and no longer apply against IA benefits.

single women, single women ages 18 to 25 are the most likely age range of single to be IA clients. This reinforces our earlier observation: IA recipients, particularly single adults, are young.

Figure 3
IA Single Adult Caseload by Gender and Age



Source: Author calculations

Certificate of Disability

While Nunavut does not have a specific income support program for persons with disabilities (e.g., similar to Disability Assistance in B.C. or Assured Income for the Severely Handicapped (AISH) in Alberta), it does have an extended benefit, called the “Incidental Allowance”, that can be claimed by persons who “are disabled permanently or temporarily for more than one year” or persons who “are disabled temporarily for at least six months” (Regulations Schedule B, s. 3(1) & s. 3(3)). Secondly, persons who are not capable of participating in an activity or program, are exempt from participation in a program or activity (Regulations, s. 13.1(5)).

These are two separate but related tests—the incidental and the participation exemption—although the same evidence can be furnished for both. For the participation exemption, a certification that the person cannot participate in an activity or program is required. This is a lower threshold than for the incidental. For the incidental, a medical certificate must show that the person has a disability which is defined as a person who has a “physical or mental impairment that significantly restricts the ability to perform daily living activities permanently or temporarily for at least six months, that result in requiring assistance with daily living activities, and that medical treatment would not heal” (Regulations, s. 1). In this case, the medical certificate must state the expected duration of the disability (Regulations, s. 1(2)).

As evidence for both, the Manual says that a Certificate of Disability (COD) must be provided (Manual, Directive 210).¹² The COD is approved by a “medical practitioner or by a person in a health care profession approved by the Director” (Regulations, s. 1(2)). The Manual lists approved “health care professionals” to include: a Doctor of Medicine, a doctor who is specialized in an area of medicine, a physiotherapist or occupational therapist, a psychologist, a nurse practitioner, a Registered Nurse or a registered mid-wife (Manual, Directive 1.05). Figure 4 plots the number of casefiles per month with a valid medical certificate (i.e., COD; left panel) and the percent of casefiles per month with a valid medical certificate (right panel). Overall, about 88% of casefiles *do not* have a medical certificate and 12% of casefiles have a medical certificate.

We hypothesize that the number/percent of casefiles with a medical certificate is low. Statistics Canada estimated in 2019 that 19% of Inuit have a disability (Hahmann, Badets, and Hughes 2019). Moreover, in B.C., since 2018, over 60% of B.C. IA recipients receive Disability Assistance (Green et al. Forthcoming). While the people of Nunavut are younger than the Canadian average and may have a lower disability rate (Hahmann, Badets, and Hughes 2019), and while the proportion of the Nunavut population receiving IA is higher than in the provinces meaning that this may “water down” the proportion of IA recipients with a disability, at the same time, IA’s role as a “funder of last resort” often means that it becomes a long-term program for those with disabilities who cannot work, leading to higher proportions of recipients and casefiles with disabilities on IA than those without disabilities.

We posit that there are more persons with disabilities who are receiving IA than there are recipients with medical certificates. This is because (1) knowledge about the COD and what it provides an IA client among clients is low; and, even when an IA client has knowledge about the COD, (2) medical certificates are difficult to obtain given the state of health care in Nunavut, requiring access to specialized health care and diagnostics often only available in southern Canada (particularly given the limitations on “health practitioners” as stated in the Manual); (3) the perceived benefits of attaining a COD may be low, potentially making the (difficult) attainment of a COD not worth the effort; and (4) there may be a stigma attached to having oneself labelled as a “person with a disability”.

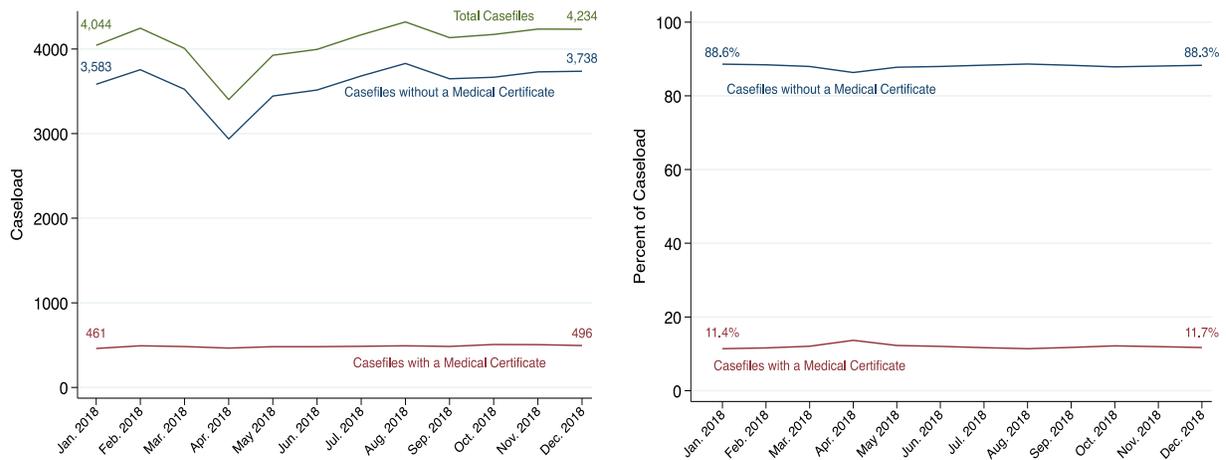
Housing of IA Clients

As discussed in Petit and Tedds (2021a) and in Petit and Tedds (2020), programs often interact and these interactions must be considered when considering reforms to IA. Of particular concern is the interaction of IA with public housing. Public housing is delivered in all 25 Nunavut communities, with 70% of all housing in Nunavut being public housing (Nunavut Housing Corporation 2020). Table 2 shows the housing situation of IA casefiles that receive an IA payment. Nearly all IA clients live in public housing or with family and friends, many of whom will also be in public housing: of IA casefiles that received a payment in any given month, on average 45% live in public housing and 52% live with family or friends. The remaining 2.8% of casefiles live in some other housing situation including own home, private market rental, shelter, no fixed address, or other (e.g., community care facility or institutional care facility).

¹² The researchers were not provided with a Certificate of Disability. However, it was conveyed to us that the test for disability and the test for participation in a program or activity are separated on the COD.

Figure 4

IA Casefiles with an Approved Medical Certificate, January 2018 – December 2018



Source: Author calculations

Table 2

Average Housing Situation of Casefiles, as a Percent of Casefiles Receiving a Payment Monthly, January 2018-December 2018

Housing Type	Mean	S.D.	Minimum	Maximum
Public Housing	44.71%	0.25	44.17%	45.25%
Living with Family or Friends	52.47%	0.22	51.99%	52.95%
Own Home	<1%	--	<1%	<1%
Private Market Rent	<1%	--	<1%	<1%
Shelter/No Fixed Address	<1%	--	<1%	<1%
Other	<1%	--	<1%	<1%

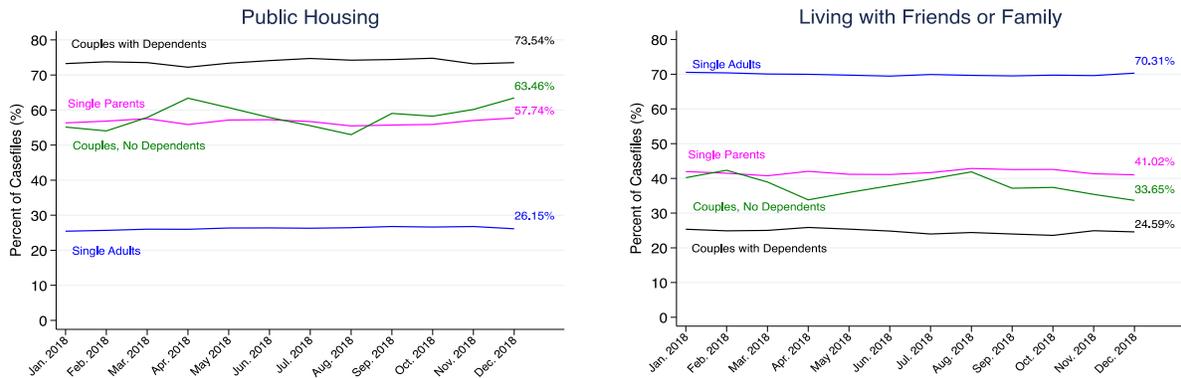
Source: Author calculations

For those living with family and friends, many may be precariously sheltered. The Canadian Observatory on Homelessness defines those who are living temporarily with others without guarantee of continued residency or immediate prospects of accessing permanent housing as “provisionally accommodated”—technically homeless without permanent shelter. Persons as just described are often referred to as “couch surfers” (Gaetz et al. 2017).

To examine these trends in more detail, Figure 5 shows the percent of casefiles living in public housing (left panel) and living with friends and family (right panel) by family type. We observe that single adults are the least likely to live in public housing (26%) and the most likely to be living with friends and family (70%). Likewise, couples with dependent children are the most likely to be living in public housing (74%) and the least likely to be living with friends or family (25%).

Figure 5

Housing Situation of IA Casefiles by Family Type, January 2018 – December 2018



Source: Author calculations

Financial Eligibility and Income of IA Clients

To be eligible for IA and receive an IA payment, applicants/clients must be a “person in need” which is a two-part test. First, they must be financially eligible based on their income and assets, demonstrating a need for financial services, or what is referred to as a “budget deficit” (Regulations, s. 1.1(1)). Second, they are NOT a person in need if: they are employable and unwilling to accept employment or are not looking for employment, or they are a child, or they are incarcerated, or they have not used all their available resources. In this section we focus on the first part of this test—financial eligibility, particularly income (Regulations, s. 1.1(2)). We will return to employment obligations (and productive choices) in a later section.

To be financially eligible to receive an IA payment, an IA client must have a budget deficit, defined as (Regulations, s. 1.1):

$$\text{Net monthly income} < \text{basic benefit}$$

The basic benefit is set out in the regulations and is dependent on geographic location, family size, and certain actual expenses, a point we will return to in the benefit section. Net monthly income is calculated as (Regulations, s. 20):

$$\begin{aligned} \text{Net monthly Income} = & (\text{Earned Income} - \text{Exempted Earnings}) \\ & + (\text{Unearned Income} - \text{Deductions}) \\ & + (\text{Value of Assets} - \text{Exempted Assets}) \end{aligned}$$

Earned income is any salary/wages (net of taxes and payroll) and net income from hunting, trapping, fishing, business operations, or other self-employment income of an applicant and their spouse/partner (net of business expenses; Regulations, s. 20(3)). Deducted from this earned income is exempted

earnings. For adults with no dependent children (e.g., couples and single adults), the earnings exemption is \$200/month plus 50% of the next \$600. For adults with dependent children (e.g., couples with children and lone parents), the earnings exemption is \$400/month plus 50% of the next \$600 (Regulations, s. 20(6)).

Unearned income includes a variety of other income such as: income from renters, boarders, and lodgers; child support and maintenance support payments; Employment Insurance; OAS/GIS; CERB; allowances from training programs; and the value of goods and service received (often called “in-kind” income). There is also a catch-all phrase that income in excess of \$700 /month which cannot be attributed to earned income, exempted income, or any of the enumerated unearned income categories falls under as unearned income.

While not in the budget deficit formula above, the regulations also include the category “exempted income” which is a list of income from various sources that are considered neither earned nor unearned income and thus are exempted from determining a clients net monthly income (Regulations, s. 20(2) & s. 20(5)). Exempted income includes: child tax benefits, the Canada Child Benefit and the Nunavut Child Benefit, payments received as treaty payments, payments under the Nunavut Land Claims Agreement, or payment from NTI, and the Worker’s Income Tax Benefit (now the Canada Worker’s Benefit). It should be noted that in 2018 (the year of data we analyze), tax refunds were *not* considered exempted income: they were included in unearned income. As of July 2021, tax refunds of up to \$3,000/person are now exempted income.

The value of assets is also included as income. Assets that can be converted to cash in less than 90 days and fetch at least 75% of market value are considered unearned income (Regulations, s. 20(4)). There are also asset exemptions. First, an applicant who is less than 60 years old and is not disabled has an asset exemption of \$500/month if they have no dependents and \$1,000/month if they have dependents. An applicant who is disabled or over 60 years old can hold up to \$5,000/month (Regulations, s. 20(5)). Second, specific types of assets are exempt including: personal residences, the value of equipment for hunting, trapping, fishing, logging, and equipment required for business operations. Finally, the Manual exempts (by the order of the Director), the value of all clothing, furniture and bedding, toys, and tools as assets (Manual, Directive 135, p. 119). The Manual also implies that a second piece of equipment used for hunting, trapping, fishing, logging is not exempt, e.g., a second snowmobile (Manual, Directive 135, p. 119).

It should be noted that the Manual requires IA recipients to file taxes to receive their full benefit amount. Specifically, “Applicants are required to demonstrate that they have submitted their Income Tax Assessment for the current and previous year...50% of Basic Allowance and full rent/utilities can be issued until an applicant demonstrates that they have applied for the prior year’s income tax” (Manual, Directive 134, p.115-116). This authority is purportedly derived from the Regulations, s. 6(1) which says that an IA caseworker *may* require an applicant to fully disclose all information the IA caseworker deems sufficient to establish eligibility” and, from Regulations s. 20(5)(a.1) that classifies tax filing refunds as part of exempted income as part of the financial eligibility review. While aiding IA clients to file taxes is important (so they receive the benefits to which they are entitled), it is unclear that the Regulations

require that taxes *must* be filed. Moreover, reducing IA benefits due to a failure to file taxes does not appear to be a power the Director can exercise under the Act or Regulations.

It should be noted that none of the provinces require IA recipients to file taxes. The act of filing taxes may be a barrier to access for IA or result in harm. For example, for women fleeing violence, tax filing may require cooperation from the spouse/partner they are fleeing. Further, persons who are extremely distrustful of government or the state may also refuse to file their taxes.

Moreover, although IA caseworkers are directed to assist IA applicants to set up a My CRA account or refer them to a Service Canada office (Manual, Directive 134, p.116), it is likely that tax filing is a barrier to IA support. Canadian tax forms are only produced in English and French, are time-consuming to fill out, and, if a tax filing company is hired (e.g., H&R Block), is expensive. There is also a history of colonialism and distrust with government institutions which this Manual Directive fails to consider.

Amount and Sources of Income of IA Clients

To understand how financial eligibility criteria affects IA caseloads, we look at income received by IA clients and its sources. Table 3 presents income statistics for all casefiles that are assessed for IA in a given month (column 1), for casefiles that receive an IA payment (column 2) and for casefiles that do not receive an IA payment (column 3). From Table 3 we see that an average of 33% of all casefiles that are assessed for IA in a month have income other than IA income, with an average of 21% having earned income and 13% having unearned income—both of which result in the reduction or elimination of IA benefits (which we will examine in a later section). Only an average of 4% of all casefiles monthly have excluded income.

Also, from Table 3 we see that of those casefiles that receive an IA payment, 30% have income other than IA income of an average other income of \$810/month. Comparatively, of those casefiles that *do not* receive an IA payment, 97% have other income of an average amount of \$2,870/month. That is, for casefiles that do not receive an IA payment but who are assessed for IA eligibility, they have much higher other income which likely makes them ineligible for an IA payment.

Comparatively, in 2018 an average of 6.7% per month of income assistance casefiles for those “expected-to-work” in B.C. had income.¹³ And 21% of all Disability Assistance casefiles in fiscal year 2018 in B.C. had income. Overall, Nunavut IA clients are more likely to have income than B.C. income assistance clients. This suggests a resiliency on the part of IA recipients.

We next look at trends in income, other than IA benefits, of IA casefiles over time. Figure 6 plots income per casefile across all IA casefiles within a month for casefiles with an IA payment (left panel) and for IA casefiles without an IA payment (right panel). To create this measure, we aggregate total income of all casefiles in a month (for either casefiles that receive an IA payment or for those that do not) then divide that by the total number of casefiles with an IA payment and without an IA payment, respectively. We

¹³ Author calculation based on income assistance data provided by Robert Bruce from the Ministry of Social Development and Poverty Reduction in B.C..

Table 3

Average Monthly Income of IA Casefiles, January 2018 – December 2018

	With and Without IA Payment	With IA Payment	Without an IA Payment
Number of Casefiles	4,264 (46.6)	4,074 (70.2)	189 (29.6)
Percent of Casefiles with Other Income	32.60% (1.19)	29.58% (0.81)	97.22% (0.57)
Percent of Casefiles with Earned Income	20.79% (2.00)	18.55% (2.14)	72.62% (13.09)
Percent of Casefiles with Unearned Income	13.25% (6.86)	11.40% (4.67)	46.21% (17.65)
Percent of Casefiles with Excluded Income	4.18% (1.51)	4.02% (1.41)	8.33% (5.18)
Avg. Amount of Other Income (if non-zero)	\$1,086 (46.0)	\$810 (24.3)	\$2,870 (109.9)
Avg. Amount of Earned Income	\$974 (85.44)	\$748 (40.77)	\$2,336 (478.92)
Avg. Amount of Unearned Income	\$780 (175.81)	\$537 (66.72)	\$1,981 (348.23)
Avg. Amount of Excluded Income	\$1,008 (357.08)	\$1,012 (380.07)	\$1,061 (251.69)

Note: Standard deviation in brackets. Earned income is earned income net of taxes/payroll and business expenses before the earnings exemption is applied. Unearned income is gross unearned income before any applicable IA deductions are applied.

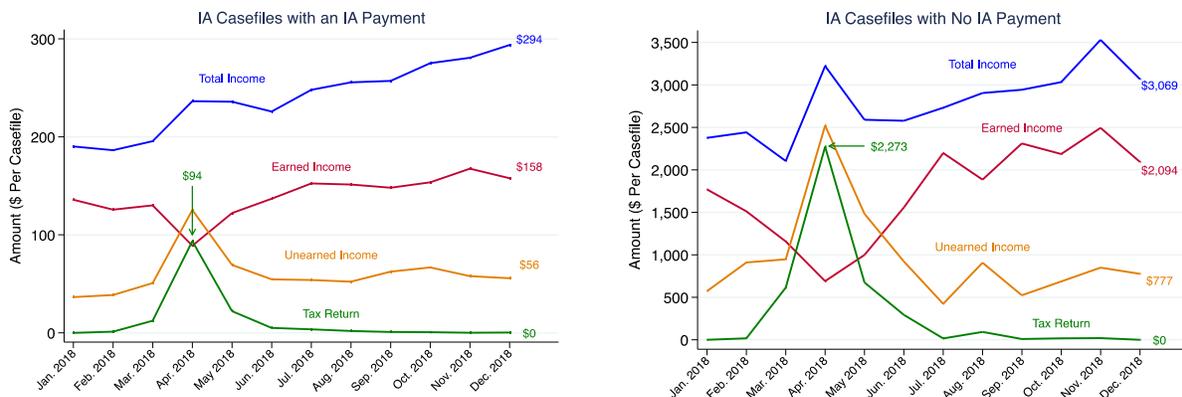
Source: Author calculations

do this for total (other) income (blue line), earned income (red line), unearned income (orange line) and tax return income (a form of unearned income; green line).

From Figure 6 we see that for both IA casefiles with an IA payment and IA casefiles without an IA payment, total non-IA income per casefile increased over 2018. This is largely driven by an increase in earned income. We also see that for both, there is a large spike in unearned income in April. This spike is due to the receipt of tax returns. This spike is much larger for IA casefiles with no IA payment: they receive \$2,273 per casefile on their tax returns in April compared with \$94 per casefile for IA casefiles who received an IA payment in April. It is the receipt of tax returns which drives the decline in the caseload in April as seen in Figure 2. In April, 33% of all casefiles receive unearned income and 12.8% of all casefiles do not receive an IA payment. Comparatively, in all months other than April, an average of 11.5% casefiles received unearned income and only 3.6% of all casefiles do not receive an IA payment.

Figure 6

Non-IA Income Per Casefile, January 2018 – December 2018



Source: Author calculations

Earned Income

As discussed, earned income includes income from three sources: *net* wages and salaries including voluntary deductions, *net* income from hunting, trapping, fishing, business operations, and other self-employment income (Regulations, s. 20(3), emphasis added). In the data, earned income is recorded as:

1. Carving payments
2. Child care payments
3. Handicrafts
4. Honorarium payments
5. Wages including voluntary deductions
6. Wages of persons 16-18 not attending education or training
7. Other earned income
8. Sales of goods or services
9. Business operation net income
10. Fish and fur

For each type of earned income, both a gross and net amount are recorded. For every single type of earned income for every single person that has earned income, the gross and net amount are identical. Given that it is not precisely clear on how “gross” and “net” amounts are determined, this may indicate that only gross or only net amounts are being recorded. If only net amounts are recorded, this is not a significant issue, as that is the required information. However, if gross amounts (e.g., gross revenue from the sale of country foods that appears as a dollar value in a person’s bank account) are being used to calculate monthly income instead of the net amount (e.g., gross revenue minus the costs of fuel, equipment, etc.), then IA recipients may not be receiving the full benefits they are entitled to, as the cost of engaging in traditional activities is not trivial.

The other point to note here is the inclusion of “voluntary deductions”. Voluntary deductions can include deductions into savings accounts such as Registered Retirement Savings Plans (RRSPs) and Tax-Free Savings Accounts (TFSA’s). Contributions to an RRSP are deducted directly off a person’s paycheque before-taxes and are not taxed at the time they are earned/contributed: they are only taxed at the time of withdrawal, which, for many people, is after retirement age. Contributions to a TFSA are made after-taxes; however, investment income earned in a TFSA and withdrawals from a TFSA are not taxable. Both RRSPs and TFSAs were created and designed to encourage savings, e.g., for retirement and general lifetime savings. By including them in the IA income calculation, this not only discourages savings but reduces the opportunity for an IA client to begin building a more secure financial foundation.

Continuing Eligibility

Once a new IA applicant becomes an IA client, they must, for the first three months, report in-person to their IA caseworker who re-verifies their financial eligibility. After the first three months, if the IA worker is of the opinion that the recipient’s monthly benefit/financial eligibility will not change within the next three or more months, a recipient may be issued assistance monthly without financial review for up to

twelve months (Regulation, s. 13).¹⁴ Furthermore, for persons living in remote and inaccessible areas, IA may be provided to in advance for up to two months (Regulations, s. 12(2)).

The Manual additionally directs that if a recipient's benefit does not change by \$500 or more in the three months of reporting, they may be eligible for this pause of monthly financial reviews (Manual, Directive 310, p.153). The first time a recipient is eligible for this pause of monthly financial review, the period for which financial reviews are paused cannot exceed six months (Manual, Directive 310, p.153). While we note these Regulation sections here, we cannot investigate them using the data.

Participation in a Program or Activity: “Productive Choices”

Along with being financially eligible, to be considered a “person in need” and thus be eligible for IA, an applicant who is employable must demonstrate they are searching for and are willing to accept employment of any type (Regulations, s. 1.1 & s. 5). To demonstrate this, an IA applicant must participate in a “program or activity” (Regulations, s. 13.1(1)(c)). Programs and activities (also referred to as “productive choices”) include: wage employment, employment in traditional activities, education or training, parenting, care of an adult family member, counselling or treatment, and community service (Regulations, s. 13.1(6)). Recipients must report on their activities as they are monitored by the Income Assistance Officers (Regulations, s.13.1(3)) and benefits may be terminated for failing to participate in a program or activity (Regulations, s. 16(1)(c)). Persons 60 years and older and persons who are not capable of participating in a program or activity are not required to participate in a program or activity but are assisted if they choose to do so (Regulations, s. 13.1(5)).

The Manual provides additional directives. An IA recipient can engage in more than one program at one time and can change programs without affecting benefit receipt (unless it is wage employment – the quitting of wage employment without first consulting an IA caseworker can lead to the termination of benefits (Manual, Directive 200, p. 127)). An action plan for the IA recipient is developed, including the activity they are participating in and the amount of time they participate in it per week with no minimum amount of time required (Manual, Directive 200, p. 123). The Action Plan is reviewed monthly (Manual, Directive 200, p. 123).

Figure 7 plots, for adult recipients (e.g., omitting child dependents) who receive an IA payment, the percentage of recipients by their productive choice. In interpreting Figure 7, it is important to note that recipients may choose more than one productive choice and some recipients do not have productive choices (e.g., for those only receiving IA for one month or for the first month of receipt) thus the total percentages will not add up to 100%. Further, for those with a medical certificate on file or who are age 60+ who are exempt from participating in a productive choice, may choose to do so nevertheless, thus some exempt persons will have selected a productive choice other than “exempt”.

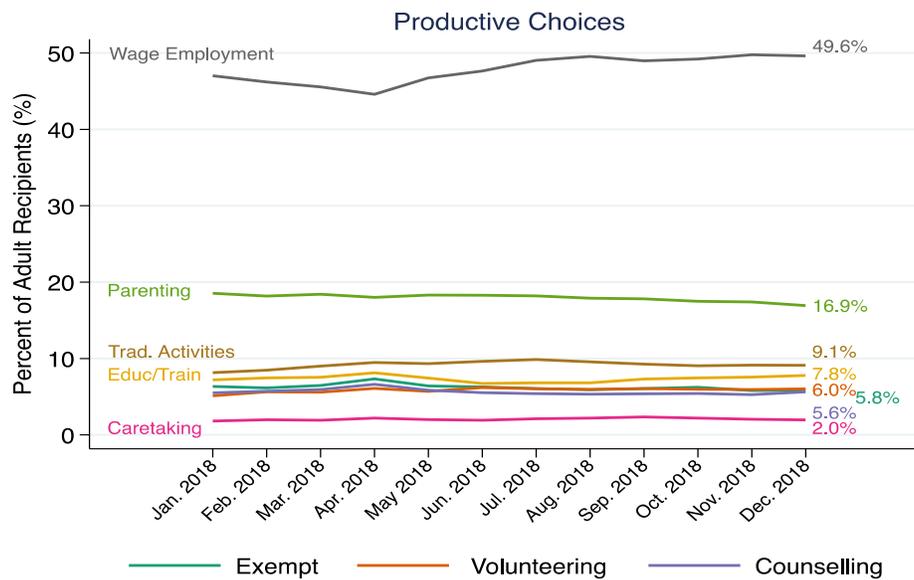
From Figure 7 we observe that wage employment is the most common productive choice: on average, 48% of adult recipients in a month choose wage employment. The second most common is parenting

¹⁴ A pilot program commenced in 2022 to test the implementation of this continuing assessment as permitted by the regulations. As of this writing, November 8, 2022, the pilot has not proceeded to full implementation but is expected to do so in the near future.

with an average of 18% of adult recipients in a month, followed by employment in traditional activities, with an average of 9% of adult recipients in a month choosing it. Across time, the proportion of recipients who choose a productive choice is relatively consistent, except in April when we see a drop in the proportion of adult recipients who choose wage employment as their productive choice. This drop is due to the receipt of tax refunds removing people from IA eligibility, which had a larger effect on those whose productive choice was wage employment compared to any other productive choice.

Figure 7

Percentage of Adult Recipients Monthly by Productive Choice, January 2018 – December 2018



Source: Author calculations

It is also instructive to disaggregate these productive choices by gender, family type, and region. Table 4 shows monthly summary statistics for productive choices by gender, and region. We observe from Table 4 that men are more likely to choose wage employment, traditional activities, counselling/treatment, and volunteering as their productive choices relative to women. Likewise, women are more likely to choose parenting, caretaking, and education and training as their productive choices relative to men.

Finally, examining productive choices by region, we observe that the regions differ. In Qikiqtaaluk, where Iqaluit is located, adult recipients are the least likely to choose wage employment as their productive choice. They are more likely to choose traditional activities, parenting, caregiving, and counselling/treatment (relative to other regions). To help explain this, recall that Iqaluit is under-represented in the IA casefiles and the rest of Qikiqtaaluk is over-represented.

Adult IA recipients in Kivalliq are more likely to choose wage employment and education and training comparative to the other regions. They are less likely to choose volunteering and counselling and treatment. Finally, in Kitikmeot, adult IA recipients are the most likely to choose volunteering and the least likely to choose parenting as their productive choice.

Table 4

Productive Choices for Adult Recipients, Monthly Summary Statistics, January 2018 – December 2018

		Monthly Mean (%)	Minimum (%)	Maximum (%)
Gender				
Wage Employment	Women	38.7 (1.6)	36.3	40.6
	Men	56.3 (2.1)	52.2	58.4
Traditional Activities	Women	4.1 (0.43)	3.1	4.6
	Men	13.9 (0.62)	12.7	14.8
Education and Training	Women	7.6 (0.50)	6.6	8.3
	Men	7.1 (0.42)	6.5	7.9
Parenting	Women	34.9 (0.99)	33.2	36.2
	Men	2.5 (0.21)	2.1	2.8
Caregiving	Women	2.4 (0.21)	2.1	2.6
	Men	1.8 (.16)	1.5	2.1
Volunteering	Women	5.3 (0.44)	4.5	5.9
	Men	6.4 (.29)	5.7	6.9
Counselling/Treatment	Women	4.6 (0.21)	4.4	5.0
	Men	6.6 (0.63)	5.9	8.1
Region				
Wage Employment	Qikiqtaaluk	42.8 (2.04)	39.1	45.3
	Kivalliq	54.9 (1.6)	51.4	57.0
	Kitikmeot	49.6 (1.7)	47.4	52.2
Traditional Activities	Qikiqtaaluk	13.1 (1.1)	10.7	14.4
	Kivalliq	5.8 (0.41)	5.3	6.7
	Kitikmeot	5.2 (0.43)	4.6	5.9
Education and Training	Qikiqtaaluk	4.6 (0.53)	3.6	5.2
	Kivalliq	12.7 (0.75)	11.8	14.0
	Kitikmeot	6.3 (0.38)	5.7	7.1
Parenting	Qikiqtaaluk	18.5 (0.66)	17.4	19.5
	Kivalliq	18.4 (0.57)	17.7	19.5
	Kitikmeot	16.2 (0.70)	14.9	17.4
Caregiving	Qikiqtaaluk	2.8 (0.23)	2.3	3.2
	Kivalliq	1.1 (0.12)	0.8	1.2
	Kitikmeot	1.9 (0.17)	1.6	2.2
Volunteering	Qikiqtaaluk	6.1 (0.74)	4.1	7.0
	Kivalliq	0.5 (0.12)	0.3	0.6
	Kitikmeot	12.0 (0.53)	11.0	13.0
Counselling/Treatment	Qikiqtaaluk	6.9 (0.43)	6.5	7.9
	Kivalliq	4.3 (0.32)	3.8	5.0
	Kitikmeot	4.7 (0.65)	3.8	6.1

Source: Author calculations

Benefit Types and Amounts

Benefits are calculated as:

$$\text{Benefits Recieved} = (\text{Basic Benefits} - \text{Net Monthly Income}) + \text{Extended Benefits}$$

Basic benefits are composed of the basic allowance or sundries allowance; plus accommodations, the fuel allowance, and the utilities allowance or room and board. We go through each next.

The basic allowance differs across geographical zone and family size and is shown in Table 5. The basic allowance amounts were set in July 2018 and have not changed since then (Government of Nunavut 2018). If a recipient is staying in a medical or treatment facility, they may receive in place of the basic benefit a sundries allowance of \$50/month. Accommodation covers a maximum of the actual cost of rental accommodation (Regulations, Schedule A, s. 5) including the costs of a single room, public housing rent, an apartment, house, or mortgage payment (Manual, Directive 510, p. 168). For rentals, a lease agreement that is signed by the head of house is required and it must also include the name of all dependents also living in the rental (Manual, Directive 510, p. 168). The actual cost of an IA recipient's fuel and utilities is also provided as part of the basic benefits (Regulations, Schedule A, s. 6 & 7). Services must be in the recipient's name (or their spouse) to be eligible (Manual, Directive 530, p. 175).

Table 5

Basic Allowance in Nunavut, as of November 2022 (Legislated July 2018, No Changes Since)

Zone	Zone 1	Zone 2	Zone 3	Zone 4
Municipalities in Zone	Arviat Iqaluit Rankin Inlet	Arctic Bay Baker Lake Cambridge Bay Chesterfield Inlet Gjoa Haven Hall Beach Igloolik Kugluktuk Naujaat Whale Cove	Cape Dorset Kimmirut Pangnirtung Sankiluaq Taloyoak	Clyde River Coral Harbour Grise Fiord Kugaaruk Pond Inlet Qikiqtarjuaq Resolute
Number of Family Members	Monthly Allowance			
1	\$682	\$727	\$740	\$782
2	\$866	\$921	\$937	\$986
3	\$1,079	\$1,144	\$1,163	\$1,222
4	\$1,373	\$1,455	\$1,478	\$1,553
5	\$1,644	\$1,742	\$1,770	\$1,859
6	\$1,894	\$2,006	\$2,038	\$2,140
7	\$2,123	\$2,247	\$2,283	\$2,396
8	\$2,329	\$2,464	\$2,503	\$2,627
9	\$2,514	\$2,659	\$2,700	\$2,832
10	\$2,678	\$2,830	\$2,874	\$3,013

Source: Regulations, Schedule A

Room and board agreements are agreements that cover accommodation, fuel, and utilities. For those with room and board agreements, they do not receive accommodation, utilities, or fuel allowances as they are all rolled into one agreement. The Manual suggests that the room and board allowance shall not exceed \$1,200/month without approval (Manual, Directive 520, p. 172).

Extended Benefits

There are several extended benefits an IA recipient may be eligible for. These include:

- Incidental Allowance
- Expenses Incidental to Education and Training
- Household Furnishings and Equipment
- Damage Deposits
- Emergency Assistance
- Day Care Subsidy Allowance

Beginning with the Incidental Allowance, it is an extended benefit for persons with disabilities and seniors. There is no separate program for persons with disabilities as is the case in the southern provinces. For a person who is “disabled permanently or temporarily for more than one year”, they receive an additional \$250/month (Regulations, Schedule B, s. 3(1)). For a person who is older than 60 years, they receive an additional \$175/month (Regulations, Schedule B, s. 3(2)). Finally, for a person who is “disabled temporarily”, they receive an additional \$125/month (Regulations, Schedule B, s. 3(3)).

As discussed previously, to receive the disability incidentals, a Certificate of Disability that indicates that a recipient is unable to participate in a program or activity is required (Manual, Directive 550, p. 179). This is inconsistent with the regulations which define a disabled person as having “physical or mental impairments that significantly restrict the ability to perform daily living activities...that result in requiring assistance with daily living activities and that treatment would not heal” (Regulation, s. 1). As a Certificate of Disability has not been provided to us, it is unclear which definition is used. Regardless, obtaining a Certificate of Disability may be a barrier to obtaining the incidentals related to disabilities, particularly outside of Iqaluit.

The Emergency Assistance extended benefit is also of note. The Emergency Benefit is for the protection of life, maintenance of physical and mental health, and “doing what is right for the client, community, and Nunavut” (Manual, Directive 600(2), p. 190). A person does not have to be an IA recipient to be eligible for Emergency Assistance (Manual, Directive 600(3), p. 190) and the definition of emergency is left to the discretion of the caseworker (Manual, Directive 600(4) & (5), p. 190). This is more flexible than the cash emergency benefit in B.C., also called the Crisis Supplement. In B.C., the Crisis Supplement is only for IA recipients, has pre-defined benefit amounts for different needs (e.g., food, clothing, utilities, etc.), and can only be issued if the situation fits what is defined in the BCEA Manual as an emergency (Province of British Columbia 2018).

Types of Need-Based Payments Received by IA Casefiles

As discussed above, there are a variety of different benefits an IA client may receive. In this section, we examine the types of needs that IA casefiles that receive an IA payment are approved for (and receive). Figure 8 shows the percentage of casefiles by family type and disability incidental receipt who receive the basic allowance (panel A), the accommodation benefit (panel B) and the fuel and/or utilities benefit (panel C).¹⁵ The percentages shown are for December 2018.¹⁶ The daycare subsidy was not included in our data. And, for all remaining benefit types (e.g., the emergency benefit, damage deposits, education and training, sundries allowance, etc.), either a very small amount of casefiles or no casefiles received it. We summarize these in Table 6.

We observe from Figure 8 that almost 100% of all casefiles, regardless of family type, received the basic allowance in December 2018. Single adults receiving the disability incidental had the smallest proportion who received the basic allowance (94%). However, (not pictured here), single adults with a disability incidental were also the most likely to be receiving the sundries allowance of \$50/month (~5% compared to less than 1% for all other family types with the exception of couples with dependent children and a disability incidental where 2% received the sundries allowance).

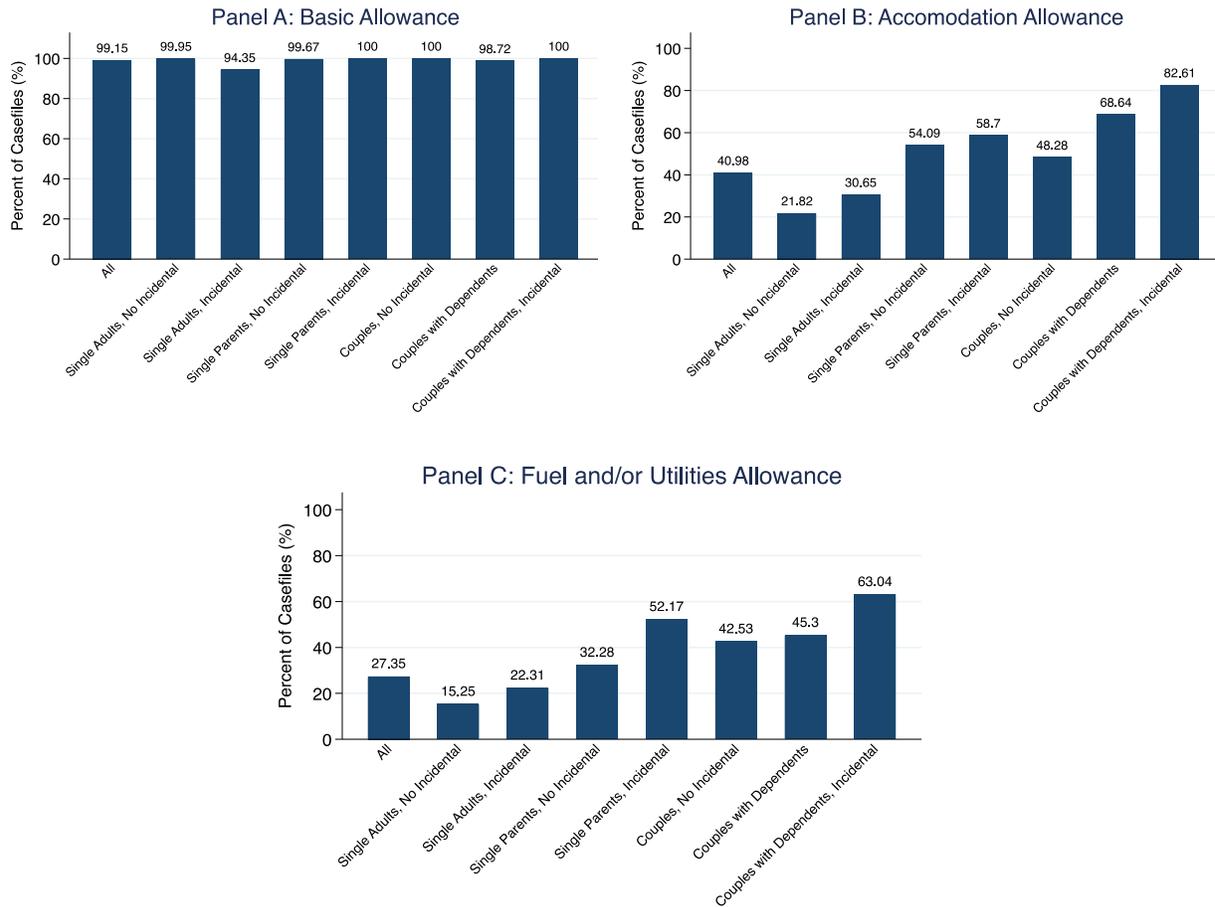
From Panels B and C, we see that couples with dependent children who receive the disability incidental are the most likely to also receive the accommodation allowance (83%) and the utilities and/or fuel allowance (63%). This is consistent with the housing situation of couples with dependent children: they were the most likely to be living in public housing and thus incurring these costs. Single adults with no dependent children and no disability incidental are the least likely to receive the accommodation allowance (22%) and the least likely to receive the utilities and/or fuel allowance (15%). This is consistent with the housing situation of single adults: they were the most likely to be living with friends or family and thus not incurring these costs.

Overall, while most casefiles receive the basic allowance, many of the extended benefits are underused despite being flexible. In particular, the wording of the emergency extended benefit is flexible but less than 1% of all casefiles receive it. Likewise, the education and training benefit is never used. Second, single adults are the least likely to receive any other benefit. This is likely due to their living arrangements—they are more likely to live with family and friends— and its likely these living arrangements are borne of necessity as opposed to a freely-made choice due to the housing situation in Nunavut. In the next section, we examine how this impacts final payment amounts. Lower payment amounts may reduce the ability of IA clients to plan for the future (e.g., to save, invest in cell phone plans, hunting equipment, education and training, etc.) and thus may diminish the ability of single adults to become self-sufficient while receiving IA.

¹⁵ That is, we assume that casefiles that receive the disability incidental have a person with a disability. 100% of these casefiles receive the disability incidental. We assume that casefiles that do not receive the disability incidental do not have a person with a proven disability. 0% of these casefiles receive the disability incidental.

¹⁶ The proportion of casefiles receiving the various allowances are fairly stable across time. We show one month for ease of visualization.

Figure 8
Assessed Needs of IA Casefiles, December 2018



Source: Author calculations

Table 6
Percent of Casefiles with Other Types of Needs, December 2018

Type of Need	Percent of Casefiles
Housing (other than accommodation allowance, incl. household furnishings, room and board, condo fees, mortgage payment, mortgage interest)	1.56%
Emergency Assistance	0.12%
Deposits (incl, damage deposits, deposits for fuel)	0.22%
Sundries Allowance	0.61%
Education and Training	0%

Source: Author calculations

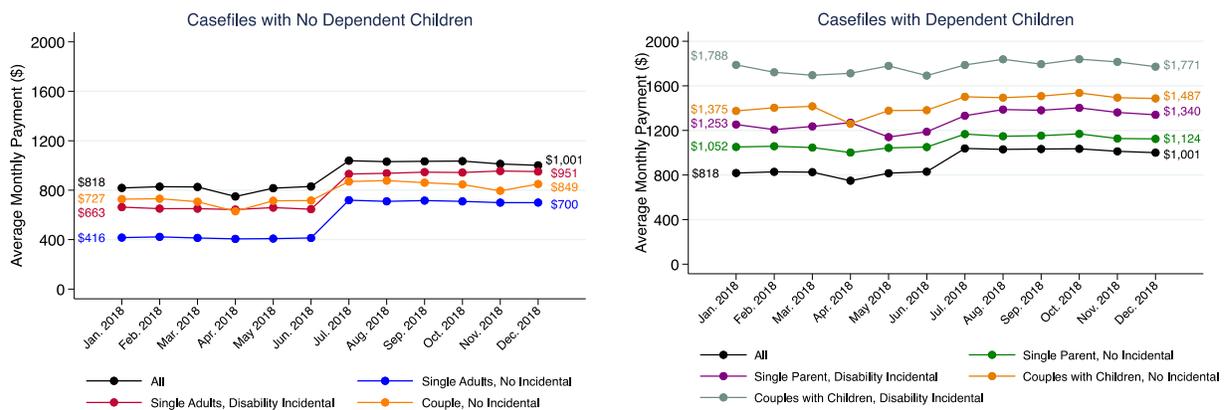
Payment Amounts Received

In this section, we examine the benefit amounts received for those needs. Note that in July 2018 there was a legislated change in benefits. Prior to July 2018, there was a basic benefit for food, which was much less than the current basic allowance in Table 5, and there was an extended benefit for clothing. This meant that while casefiles nearly always received the basic food benefit (with some exceptions), they received the clothing benefit only if they could establish a need for it. In July 2018, the food and clothing benefit were replaced by the basic allowance. The basic allowance was much higher than the food allowance and it removed the clothing assessment. Thus, when considering potential reforms to IA, benefits after July 2018 should be considered as they are more likely to be in line with current (2022) benefits.

Figure 9 shows the average monthly benefit amount received for all IA casefiles (black line in both the left and right panel) as well as for families with no dependent children (left panel) and families with dependent children (i.e., single adults and couples with no dependents; right panel).¹⁷ The average benefits calculated in Figure 9 include benefits from all IA sources including the basic allowance, the accommodation allowance, the fuel/utilities allowance, and the extended benefits. Figure 9 shows that the average benefit significantly increased in July 2018 following the legislation change.

Further observed from Figure 9 is that for casefiles with no dependent children, the average benefit received is below the average benefit received by all casefiles (the black line). Single childless adults with no disability incidental received the lowest monthly IA benefits on average: between July 2018 and December 2018, the average benefit received was between \$706 and \$727 a month, about \$8,472/year - \$8,724/year if received for 12 months. Single childless adults who received the disability incidental received on average \$250/month more than single childless adults who do not receive the disability incidental—about the amount of the disability incidental.

Figure 9
Average IA Payments to Casefiles, January 2018 – December 2018



Source: Author calculations

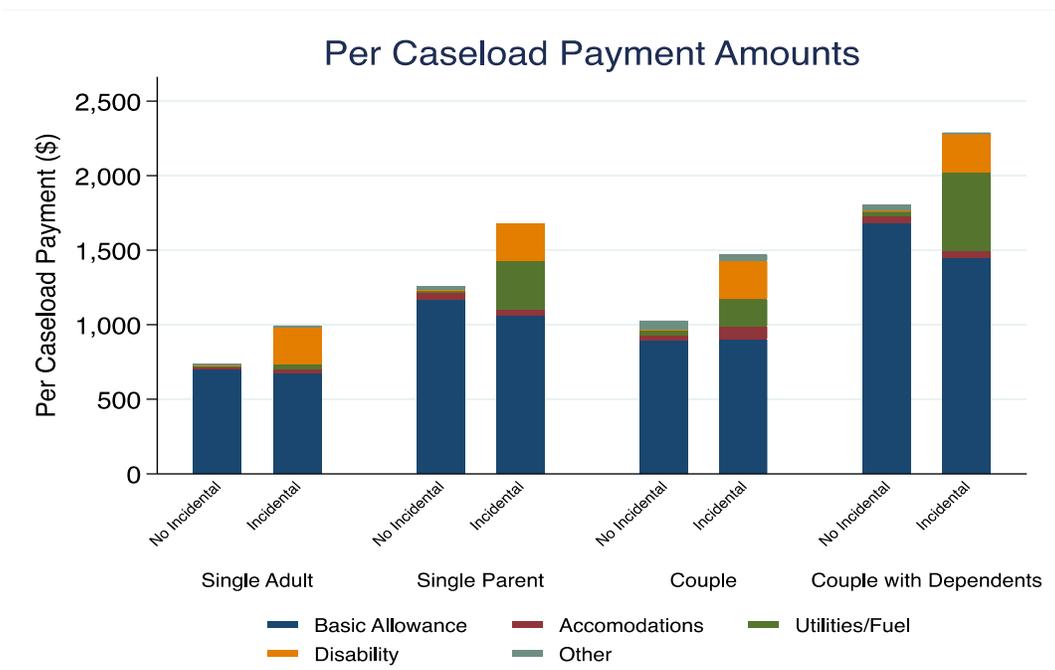
¹⁷ In the figure, couples receiving the disability incidental were omitted due to small sample size.

Comparatively, for casefiles where there are dependent children, they receive higher benefits than the average benefit received by all casefiles (the black line). Single parents received, on average, between \$1,132 and \$1,180 a month with no disability incidental or between \$1,376 and \$1,474 a month with a disability incidental between July and December 2018. To put this into perspective, a single parent with a disability and with two children receiving \$1,474/month, would receive \$17,688/year.

Finally, we disaggregate IA payments into the different types of needs and examine the composition of IA payments by family type. Figure 10 plots, for each family type for December 2018, the per caseload benefit amount by need type. That is, for each family type, we sum the total benefits by the need type and then divide that sum by the total number of casefiles.

Figure 10 is consistent with both Figure 8 and Figure 9. It shows that single childless adults receive the smallest payment amounts, with the majority of their payments coming from the basic allowance and a very small amount coming from the accommodation allowance or the utilities/fuel allowance. While the other family types also receive somewhat larger amounts per casefile for the accommodation allowance or the utilities/fuel allowance, these amounts are still small due to the low proportion of casefiles who actually receive it. Overall couples with dependents and the disability incidental receive the largest amounts per casefile for the utilities/fuel allowance, followed by single parents with the disability incidental. Childless couples with the incidental receive the largest amount per casefile for the accommodation allowance (although this may be due to small sample size), followed by couples with dependents and the disability incidental.

Figure 10
Per Caseload Payment Amount by Family Type and Need Type, December 2018



Source: Author calculations

Table 7*Per Caseload Payment Amount by Family Type and Need Type, December 2018*

Family Type		Basic Allowance	Accommodation Allowance	Fuel and Utilities Allowance	Disability Incidental	Other
Single Adult	No Incidental	\$704	\$14	\$7	\$0	\$8
	Incidental	\$680	\$21	\$38	\$248	\$3
Single Parent	No Incidental	\$1,169	\$46	\$17	\$0	\$21
	Incidental	\$1,062	\$38	\$331	\$247	\$0
Couple	No Incidental	\$897	\$30	\$35	\$0	\$57
	Incidental	\$903	\$88	\$181	\$257	\$41
Couple with Dependents	No Incidental	\$1,681	\$51	\$28	\$0	\$40
	Incidental	\$1,448	\$50	\$525	\$258	\$6

This analysis suggests that while benefits that cover actual costs of living are a good thing (as they cover the actual costs of living), they leave some IA recipients at a disadvantage, particularly single childless adults and childless couples. They must rely mainly on the basic allowance, which, as we will show in the next section, leaves them well below the low-income poverty line.

Poverty Rate and Depths of IA Casefiles

In this section we examine the poverty rate and depths (i.e., low-income rate and “average gap ratio”) of IA casefiles. That is, given the richness of the data, we can calculate the total income of IA casefiles: the combination of IA payments (including all basic and extended benefits) plus all gross earned, unearned, and excluded income. This is not the same as the measure of disposable income used in formal MBM statistics; however, if anything, this will overstate income and thus understate the poverty rate.¹⁸ This can be compared against the estimated MBM thresholds discussed in Impact Economics and Two Worlds Consulting Ltd. (2021) and as used in our Basic Income simulation exercise (Tedds et al. 2022). In this calculation, to create the MBM threshold, we take the MBM threshold for a family of four living in a remote area in the Northwest Territories (\$95,000) and subtract from it the cost of shelter (\$30,000). This approach is contentious: on the one hand, the vast majority of IA clients either live in public housing or with family and friends and thus would not incur this cost of housing. On the other hand, this suggests that IA clients in Nunavut are not expected to become “independent” in the Western sense of renting or owning a home on the private market, re-enforcing the role public housing plays in Nunavut. We then adjust the threshold for family size.

Finally, we compare total monthly income to the monthly MBM threshold (i.e., we divide the MBM threshold by 12). This is unorthodox as the MBM poverty rate is typically examined at the annual level, comparing annual income to the annual threshold. We believe annualization is not the best way to

¹⁸ MBM disposable income is calculated by taking total gross income, minus deductions (e.g., EI/ CPP premiums) and taxes, plus transfers minus a number of other expenses such as child care, and medical expenses. In the method we use, we can approximate after-tax-and-transfer income but cannot see other expenses.

examine income use in this context because it assumes the ability to smooth income over the year by saving money when more is available. The low level of total income of IA clients means that they will almost certainly need to use what they have when they have it. Further, colonial assumptions about prioritizing investment in the self and the immediate family (e.g., saving to buy a house, go to school, etc.) may not hold in a culture that has survived for millennia on sharing abundant resources with extended family, especially given that one's family and friends are likely having difficulties paying their bills or putting food on the table. Thus, a monthly measure may be more reflective of access to income.

Figure 11 plots the monthly poverty rate for all assessed IA casefiles, whether or not they receive an IA payment. From Figure 11 we see that the poverty rate is nearly 100% for the entire year despite the increase in benefits in July 2018: in January 2018 the poverty rate for all assessed IA casefiles is 99.6%. This drops to 99.1% by December 2018. The decline in the poverty rate in April 2018 is due to the receipt of tax refunds (see Figure 6). Single adults have a slightly higher poverty rate than the average and, for most months, have the highest poverty rate.

Next, Figure 12 plots the average gap ratio of IA clients in Nunavut. The average gap ratio is a measurement of poverty depths. We take all persons in poverty, and for them, calculate the gap between their total income and the MBM threshold. This is then expressed as a percentage of the MBM threshold. We then take the average of this number across all casefiles. The higher the average gap ratio, the deeper the depths of poverty.

We see from Figure 12 that the average gap ratio for IA clients improved over 2018: for all casefiles, the average gap ratio was 75.6% in January 2018. It declined to 67.5% by December 2018. Single adults saw the largest decrease in their average gap ratio, followed by couples. The July 2018 benefit change is likely the driver of this decrease and, as Figure 9 shows, single adults and couples benefitted the most from the benefit increase.

We also see from Figure 12 that single adults have the highest average gap ratio. That is, not only do single adults have the highest poverty rate and the lowest IA payments, but they experience the deepest depths of poverty. Likewise, couples with dependent children have the lowest average gap ratio: they also have the highest IA benefits.

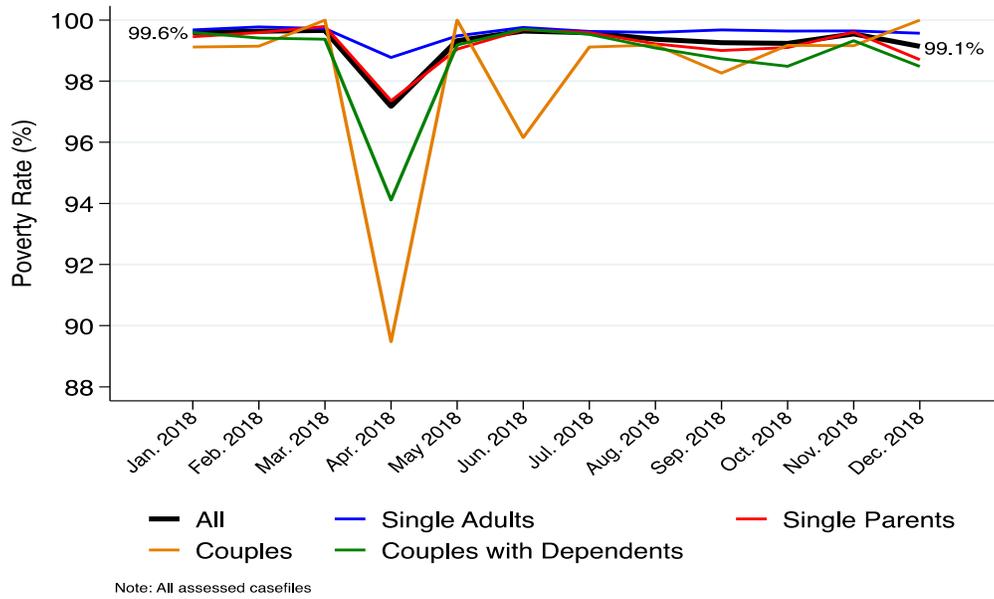
Length of Time Spent on IA

In this section we examine duration spent on IA to understand reliance on IA. As we only have 2018 data, this analysis is limited, but it can provide some insights. In particular, we examine how many months in 2018 a casefile receives a payment. We limit the sample to only include those casefiles who received a payment in January 2018. In total, 4,044 unique casefiles receive a payment in January, representing 63% of all unique casefiles who receive at least one IA payment at any point in 2018. For these casefiles receiving a payment in January 2018, the maximum length of time we can observe them receiving a payment is 12 months.¹⁹

¹⁹ The general idea here is that if we use all casefiles, for those casefiles who only begin receiving IA in December 2018, the maximum number of months we can observe them is one. This skews results.

Figure 11

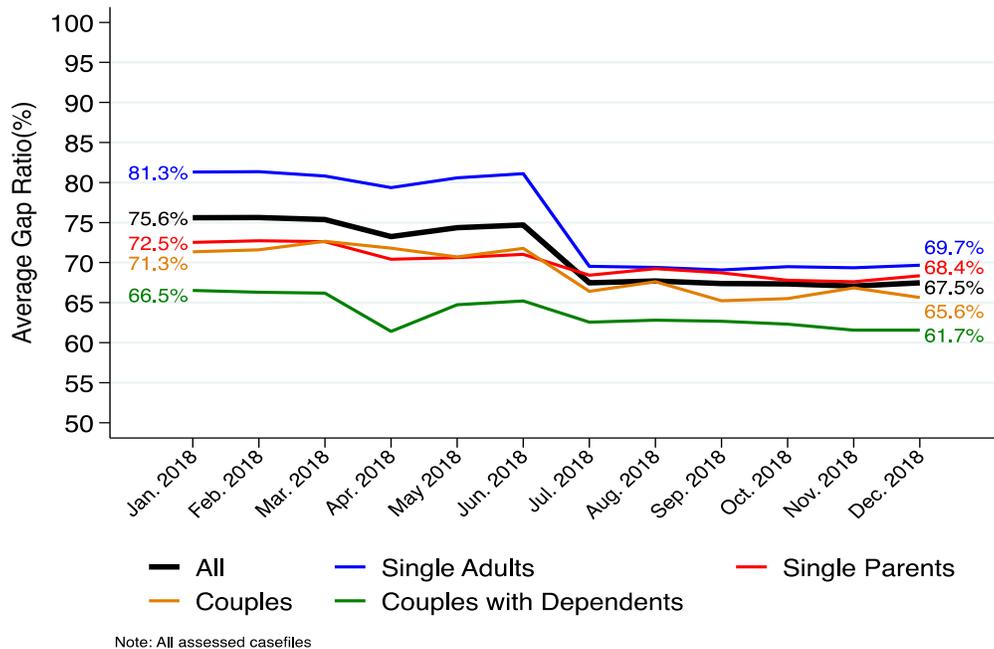
Poverty Rate of IA Casefiles, By Family Type, January 2018 – December 2018



Source: Author calculations

Figure 12

Average Gap Ratio of IA Clients, January 2018-December 2018



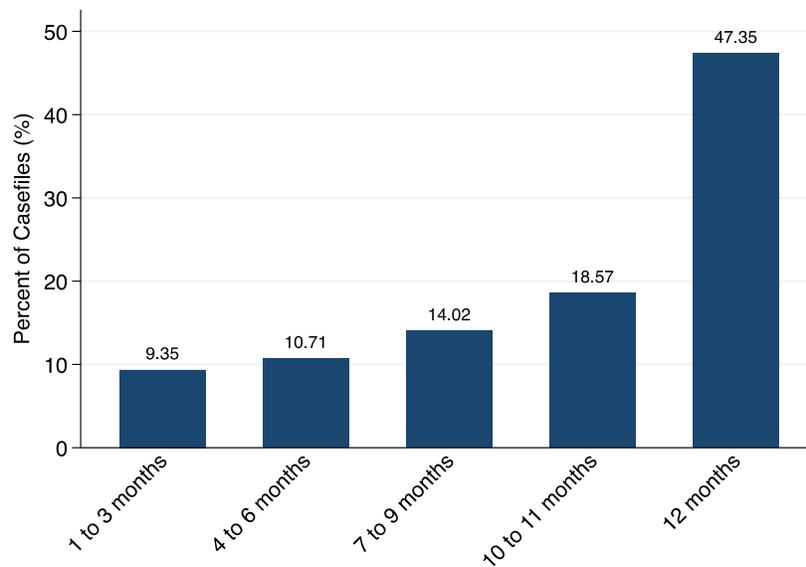
Source: Author calculations

In 2018, the receipt of tax returns made many IA casefiles ineligible for an IA payment for one month; as of 2022, this will no longer occur. Because of this, we have adjusted the number of months a casefile receives a payment in 2018 for tax returns. That is, if a casefile would have received a payment but for the receipt of a tax return, we count it as if they did receive a payment.

Figure 13 plots how many months in 2018 casefiles received an IA payment. We see that 47% of these casefiles received 12 months of IA payments and 66% of these casefiles received 10 to 12 months of IA payments. That is, most casefiles receive IA for the entire or close to entire 2018 calendar year.

Figure 13

Number of Months Casefiles Receive an IA Payment for Casefiles that Received an IA payment in January 2018, Adjusted for Tax Returns



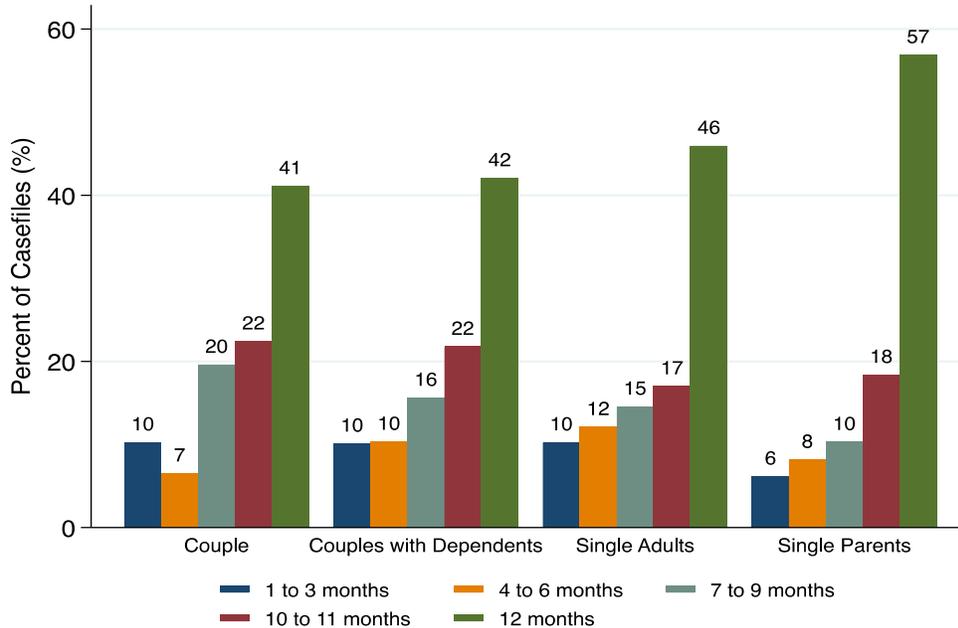
Source: Author calculations

Examining this in more detail, Figure 14 replicates Figure 13 but breaks it down by family type. That is, Figure 14 shows, for those casefiles who received a payment in January 2018 and adjusted for the receipt of tax returns, how many months in total in 2018 casefiles received an IA payment for, disaggregated by family type. It should be noted that the results in Figure 14 for couples should be examined with caution: couples are under-represented in January 2018. They are more likely to begin receiving IA later in 2018 than any of the other family types, thus, their results are likely biased.

Figure 14 shows that single parents were the most reliant on IA in 2018. That is, single parents were the most likely to receive 12 months of IA payments in 2018 (57%) and were also the most likely to receive 10 to 12 months of IA payments in 2018 (75%). Second, while single adults were the second most likely to receive 12 months of IA payments in 2018 (46%), couples with dependent children and single adults were almost equally likely to receive 10 to 12 months of IA payments in 2018 (63% and 64% respectively).

Figure 14

Number of Months Casefiles Receive an IA Payment for Casefiles that Received an IA payment in January 2018, by Family Type, Adjusted for Tax Returns



Source: Author calculations

This high reliance on IA is likely directly linked to colonialism: a history of relocation and residential schools, combined with cultural trauma and the ongoing tension between land-based activities and the wage economy. As Tedds, Cameron, and Atherly (2021) note, a lack of well-being is directly linked to these factors (p. 11). These factors reduce opportunities for self-reliance and lead to increased reliance on government income and social support programs, such as IA, to meet core needs.

Appeals

Finally, in this section we discuss the appeal process. An applicant or recipient of IA may appeal any decision of an IA officer or Director regarding eligibility, or the amount paid to them (Act, s. 8(1)). An appeal is made in the first instance to an Appeal Committee which is made up of three to eight members appointed by the Minister (Act, s. 8(1) & s. 6(2)). As of March 2022, the appeal committee is currently composed of seven members, all located in Iqaluit (Government of Nunavut 2022a, 2022b). The Ministry's fact sheet suggests that all members of the appeal committee are staff members of the Department of Family Services (Government of Nunavut 2019).

A decision of the appeal committee may be appealed to the Appeal Board, composed of a chairperson, vice-chairpersons, and no fewer than three members appointed by the Minister, none of whom may be employed in the Department of Family Services (Act, s. 7). There are no further restrictions on members

of the Appeal Board; however, it is interesting to note that Appeal Board members have gone on to serve on the Appeal Committee.

From the data for 2018, there were a total of three appeals where either an eligibility or payment decision was changed. This is consistent with an appeals fact sheet that says that in 2019 there were 48 appeal applications (about 1.1% of the caseload in 2019; Maytree (2022a)), 41 appeals heard by the Appeal Committee, and 4 eligibility or payment decisions changed (37 decisions were upheld). No appeals were heard by the Appeal Board. Most appeals were heard within 30 days, except for four, although it is unclear how many decisions were made within 30 days (Government of Nunavut 2019).

Comparatively, in 2017/18, the BC Employment and Assistance Appeals Tribunal (the appeal tribunal for the IA program in BC) had 461 appeal applications (about 0.03% of its caseload; Maytree (2022b)), with 38 decisions changed or rescinded (Employment and Assistance Appeal Tribunal 2018).

This suggests that Nunavut has a slightly higher appeal rate than BC; however, it is uncertain for both geographies what an appropriate appeal rate is as appeals in both are difficult. Thus, it is uncertain whether in Nunavut this suggests that there are more decisions to appeal or whether the appeal structure somewhat more accessible in Nunavut.

Summary of IA Review

Overall, the IA program in Nunavut is a program accessed nearly exclusively by Inuit but which does not necessarily reflect Inuit values let alone basic income principles: it is not a program for Inuit built by Inuit.

While the current regulations could be read as flexible concerning issues such as productive choices and exemption from participation, and the types and amounts of benefits, the data suggests that flexibility is not being used and the Manual suggests that the exercise of Director discretion has contributed to reducing that flexibility (although recent improvements have started to mitigate this).

From the data, we see that IA clients experience a severe lack of resources with regards to both income and housing. This is especially pronounced for single childless adults. However, the high share of IA casefiles with income other than IA benefits suggests that Inuit are resourceful and resilient. Despite this demonstration, the continuing demand that IA clients engage in at least one specified-by-regulation productive choice to be eligible for benefits remains restrictive and the choice of wage employment as the main productive choice is disconcerting, both given the lack of wage employment in the territory and because it undervalues Inuit ways of living. Finally, many IA clients appear to be full-year, continuous IA clients suggesting a high-level of reliance on the IA program. This is likely a product of colonialism, the complex conflicting yet intertwined demands of the wage economy and traditional activities, and a lack of wage employment in the territory. Despite this continuing trauma, lack of opportunity, and high level of reliance, IA continues to be positioned by the Act and Regulations as a “funder of last resort”.

All of this supports the urgent need to reform IA to better align with basic income principles and Inuit values, which we discuss next.

IA and BI and IQ Principles: Review

Before discussing recommendations for IA in Nunavut, in this section we review basic income principles (as outlined in Tedds, Crisan, and Petit (2020)) and IQ principles.

Basic Income Principles

In Tedds, Crisan, and Petit (2020) and in the Tedds et al. (2021) input paper in Phase 1, the four basic income principles identified were: simplicity, respect, economic security, and social inclusion. All of these work towards supporting individual autonomy. The main message of the principles of basic income is that a basic income is humanizing. Beneficiaries have the right to dignity, subsistence, security, and the freedom to make choices. In essence, a basic income is about a framing of social justice, where the individual and their autonomy are at the heart of the framework.

In short, simplicity refers to the simplification of the income and social support system, making it simpler for those requiring supports to navigate, easy to access, and easy to know what you will receive and when you will receive it. Respect refers to the reduction or elimination of stigma. This means that the design of the program and the workers implementing it are non-judgmental, caring, and respectful of the situation of all applicants/clients. There is a reduction in feeling of shame either due to self-shame or shame perpetrated by others. Economic security refers to the ability of the recipient to be able to rely on the cash flow, know when it is coming and how much, and that the amount of cash received supports a basic quality of life (at minimum). Finally, social inclusion recognizes that people are not able to fully participate in any given sphere without having autonomy to achieve social involvement. In the context of Nunavut, this may mean the opportunity to participate in traditional activities, including the opportunity to access the necessary equipment. It may also mean the opportunity to participate in wage work, including access to child care and clothes that may be necessary for such employment. The lack of income is one barrier to social participation. A basic income promotes opportunity, inclusion, and full participation in society through the provision of income through which an individual can acquire basic material resources in the market.

After reviewing these basic income principles, what stands out is how individual focused they are. They are not community minded. This is due to the history of basic income and the nature of cash transfers: Basic income is a type of cash transfer conceived and popularized in Euro-centric settings and worldviews that put the individual at the centre. Further, cash transfers are delivered through existing colonial administrative structures that also place the individual at the centre and often hold colonial, paternalistic, and assimilative perspectives. This framework is unlikely to resonate with all cultures and worldviews. For these reasons, when considering IA reforms, we also incorporate IQ principles.

Inuit Qaujimaqatuqangit (IQ) Principles

The authors of this report are not Inuit and thus do not have the lived experience of Inuit culture. Nevertheless, we believe it is important to acknowledge and center IQ principles to remind ourselves that these recommendations are not for ourselves. Further, as *Iviqtippalliajut: In the Process of Falling*

program. Second, the Act and Regulations should be written in Inuktitut and then translated into English and French.²⁰ This will ensure Inuit values are preserved through language.

We recommend the following in re-writing the Act and Regulations:

1. State in the Act that in interpretation and in assessment for IA, Inuit culture and IQ principles take priority. This could be similar to the preamble included in Nunavut's (older) Mental Health Act (R.S.N.W.T. 1988, c.M-10).
2. State in the Act the purpose of Income Assistance: to improve the income situation of Nunavummiut and to address Inuit-specific needs related to economic well-being. This could be similar to s. 1 of Nunavut's (new) Mental Health Act (c. 19). Ultimately, this should remove reference to IA being a "funder of last resort" (both in the Act and Manual).
3. Re-brand the IA program. Currently, the income assistance program is called "Income Assistance" and applicants/recipients are referred to as "Income Assistance clients". Re-naming the program using language that is closer to "becoming a capable and contributing human being" or "becoming a stronger human being" would aid in the necessary paradigm shift, decrease stigma, increase respect, and set out the expectations of the recipient.
4. Limit the discretion of the Director. While flexibility has been built into the current Act and Regulations, the discretion of the Director seems to have historically been exercised in such a way as to limit flexibility, and to sometimes even go against the Act and Regulations. Reducing the discretion of the Director will require more codified Regulations. This will also help IA Officers and Workers in determining what they can and cannot do and it will ensure more consistent treatment of IA clients.
5. Include in both the Appeal Committee (s. 6 of the Act) and the Appeal Board (s. 7 of the Act) a legislated minimum number of positions to be occupied by Inuit, e.g., a level of Inuit representation on both the Appeal Committee and Appeal Board reflecting the ratio of Inuit to the total population in the Nunavut Settlement Area, the same as the representative level of Inuit in government employment under the Nunavut Land Claims Agreement.
6. Include a Ministerial Advisory Board that provides an annual review of IA to the Minister, and that includes a legislated minimum number of positions to be occupied by Inuit, e.g., reflecting the ratio of Inuit to the total population in the Nunavut Settlement Area.

²⁰ Note that under the Nunavut Act (SC 1993, c. 28, s. 38) laws must be enacted in both official languages, English and French, and both versions are equally authoritative.

Recommendation 2: Retire the current Manual and make available a new, plain-language Manual (in Inuktitut as well as English and French).

As we discussed, the current Manual is often inconsistent with the Act and Regulations. This Manual should be retired, and a completely new Manual should take its place. The Manual is important: it should clearly set out processes and expectations so that both IAWs and IA clients know what the process is and what to expect. The Manual should describe the Act and Regulations in plain language and the processes by which applications, appeals and decisions are made. This Manual should be publicly available on-line and in print at IA offices and anywhere else that will facilitate ease of access. The Manual should be regularly updated to reflect changes in the Act, Regulation, and processes. The B.C. Employment & Assistance Policy and Procedure Manual (<https://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual>) is a good example of a comprehensive, accessible, and regularly updated, income assistance manual.

Income Assistance Officers/Workers

Recommendation 3: Message to IA Workers that their primary role is to support and facilitate within the rules, not to police. Provide continuous training to incorporate IQ principles into case management, address gender-based violence, and help staff understand other programs IA clients may be eligible for and how to apply.

Income Assistance Workers (IAW) occupy a unique and difficult space: they are members of the community where the IA clients they work with live and almost always know recipients personally. Not only do they potentially know their personal successes and hardships, but they are put into the position of being a gatekeeper of money. When implemented as a program of “last resort”, the primary role of Income Assistance Workers (IAWs) is to ensure only those who are truly needy access the program. When implemented as a program to help become a capable and contributing human being, the primary role of the IAW is to support the individual in achieving goals and locating resources to enable them to do so. IA leadership should persistently message to IAWs that their role is changing to one of support.

IAWs should be provided the space and continual training needed to adopt Inuit values and IQ principles in their case management. They should also be provided training on how to navigate the difficult space they occupy, including training for how to address gender-based violence and other societal issues that affect IA clients. Finally, they should be provided continual training on the availability of other government and community programs that IA clients may be eligible for, and how to connect IA clients to those resources. IAW's could be made accountable to ensure clients have the benefits they are eligible for through regular performance reviews.

Recommendation 4: Examine the caseload per IAW and, where necessary, hire more IAW's to reduce caseload per IAW

Front-line staff are vital to the IA program. In order to provide proper case management, IAWs need time and space to think, read, plan, and support. IAWs with heavy caseloads do not have this time and space, and IA clients may not receive the support they need.

One Client, One Plan

Recommendation 5: Strengthen the “One Client, One Plan” Approach

As it stands now, an IA client may meet with an IAW for an IA assessment and, separately, a Career Development Officer to discuss their career options and resources. This should be harmonized and combined into one meeting to address the whole picture of the economic options of the client, including participation in traditional activities and parenting/caregiving.

Medical Certificate and Disabilities

Recommendation 6: Include those with traditional knowledge of health as qualified persons who can assess a disability or an inability to work for the purpose of IA

As discussed previously, the IA Regulations should be interpreted with regards to Inuit values. One avenue where this could be practiced in the short term is through the exercise of Director discretion in determining who is a “health practitioner” for the purpose of diagnosing disability or inability to participate in a program or activity for the purpose of the IA program (in the medium term, this should be written into regulations when Director discretion is minimized.) While a health practitioner currently includes a doctor who is specialized in an area of medicine, a physiotherapist or occupational therapist, a psychologist, a nurse practitioner, a Registered Nurse or a registered mid-wife, it could be expanded to include those with traditional knowledge of health and mental health and addiction counsellors. This expansion would minimize the costs and complexity IA clients currently face in obtaining medical certificates. It could also be done immediately with no change to the Act or Regulations. It could be rolled out in stages, beginning with more remote communities with the least access to health care services. This would allow policy makers to work out details and assess take-up. If there are significant concerns about cost, this could initially be limited to exemption from participation in productive choices and expanded to include access to the disability incidental after assessing take-up.

Recommendation 7: Prepare for the implementation of the Canada Disability Benefit (CDB)

The Canada Disability Benefit (CDB) is expected to be a monthly income transfer from the federal government to low-income Canadians with disabilities. While final details have yet to be determined, the CDB is a promising program that would provide income supports to IA clients.

To prepare for the CDB, IA clients with disabilities should be encouraged to immediately fulfill the requirements to be eligible for the Disability Tax Credit (another federal tax program upon which eligibility for the CDB may be premised). This may require a re-structuring of the Medical Certificate forms as well. As discussed, the percentage of casefiles with medical certificates appears low and it is difficult to obtain a medical certificate in Nunavut. Thus, helping clients obtain the proper documentation may require training IA Workers to identify clients who may be eligible and the provision and access to resources that would help the client cover the costs of securing documentation.

We would also recommend that the Government of Nunavut become involved in the design and implementation of the CDB to ensure that Inuit voices and complexities are heard in the design process.

Finally, we recommend that when the CDB does roll out, the CDB is counted as exempt income for the purpose of IA (to ensure that IA benefits are not reduced/clawed back by the CDB amount). Overall, this may help IA clients become self-sufficient by helping them build-up their financial base, which can help them engage in “productive choices” including traditional activities and education and training.

Financial Eligibility

Recommendation 8: Simplify the definition of income

As it stands now, the intensive definition and documentation of different types of income is intrusive and time consuming. It demonstrates a lack of respect of IA clients, their time, and their truthfulness. It also makes the financial assessment more difficult than it needs to be and the final determination of the benefit amount unreliable. Overall, it increases the level of oversight and bureaucracy, efforts that are better spent helping people rather than monitoring.

A simplification of “income” for the purpose of IA should be considered. “Income” could be re-defined to include continuous, reliable streams of income earned on the market.²¹ This definition could be loosely based on “net income” as determined by line 236000 of a T1 tax return. It would include market income (e.g., net wages/salaries, net self-employment income, rental income, capital income, etc.). For

²¹ A recent Manitoba Court of Appeal case, *Cann v. Fort Garry/River Heights* (2020 MBCA 101), determined that the Canada Emergency Response Benefit (CERB) was not “income” for the purpose of Manitoba income assistance as it did not have “the character” of regularity — it was only temporary assistance—and thus should not have caused the scale-back of income assistance benefits.

those with wage employment, this income is documented on employer-produced pay slips, T4 tax forms, and tax returns, reducing the reporting efforts of many IA clients who report income and reducing the need to intrusively study their bank accounts.

Second, assets should be removed from the income calculation. Assets, such as snowmobiles and sewing machines, are productive assets. While some assets are exempted, as in one snowmobile per casefile, the restrictions are severe. The current selling-off of assets that exceed the exemptions reduces the ability of IA clients to become self-reliant. Likewise, assets such as savings in a bank account are also productive assets: they enable IA clients to save for their futures. Further, Petit and Tedds (2021b) shows that weakening the asset test for income assistance does not increase new entry into income assistance and may even aid permanent exit from income assistance.

If assets are not removed from the income calculation, the exemption should be significantly increased, as the current asset exemptions are low compared to other provinces. Henson Trusts should also be included as an excluded asset.²²

Recommendation 9: When considering “income” from traditional activities, expenses required to engage in traditional activities should be deducted

As discussed, it is possible that when IA clients earn income from traditional activities, the cost of engaging in that traditional activity is not deducted from their gross income. This potentially discourages participation in traditional activities. This is counter to Inuit culture, heightening tensions between that wage economy and traditional activities, and is not respectful of choices made by IA clients. If it is not already done, the cost of traditional activities should be deducted from the gross income earned through traditional activities. Furthermore, it should be confirmed that “net income” for all types of self-employment income be used (as opposed to gross income).

Recommendation 10: Use provisions already in the regulations to reduce time spent on financial eligibility assessment and increase time spent on case management

In the short run, provisions already in the regulations should be rolled out to all IA clients to reduce intrusive financial assessment and monitoring and to spend more time on supportive case management and the “one client, one plan” approach.²³ That is, the regulations permit a pause on financial assessment if an IA client has been a client for three months and their financial situation is unlikely to change.

²² It is doubtful that the current wording of the Regulations excludes Henson trusts. Henson trusts are an important financial instrument for persons with disabilities and their take-up should be encouraged.

²³ There is a pilot currently in progress. The full roll-out is expected when the kinks are worked out.

Recommendation 11: Freeze IA benefits for 12 months after an IA client begins employment

The immediate claw-back of IA benefits after obtaining wage employment or beginning self-employment reduces economic security and social inclusion and increases the complexity of IA. That is, for many, IA is their only reliable source of income. They depend on that reliability to pay bills and feed members of their households. The calculation of IA benefits is complex and an IA client may not know how earnings will affect their benefit levels and whether they will be better off if they have earned income. On the one hand, this uncertainty may disincentivize participation in endeavours where there may be earned income as a method of safeguarding IA eligibility and benefits. On the other hand, for those that do have earned income and unexpectedly (to them) become ineligible for IA, this has the potential to threaten their economic security. While the earning exemption could be increased and the phase-out rate be reduced, this may not guarantee that the fear and uncertainty would dissipate: the fact remains that benefits would be reduced with earnings.

One potential solution that would address the complexity in calculating IA benefits and reduce uncertainty when other income is earned, would be to freeze IA benefits at whatever level they are at when an IA recipient begins having earnings and hold them frozen there for 12 months as if they had no earnings; they would receive the same IA benefit amount for 12 months. That is, as long as the IA client retains employment (be-it wage or self-employment), IA benefits would not change if their earnings went up for a period of 12 months. Prior to the 12-month mark, the recipient's IAW should show them how their benefits will be reduced and mutually assess whether they will still be better off working than they would be on IA alone.

If this reform were implemented along with the removal of assets as a form of income, the combined reforms would bolster IA clients' ability to build a solid financial foundation. IA clients could build up their savings and assets without fear of being ineligible for IA before having the chance to do so. This would enhance their economic stability. Further, these reforms would reduce the time spent on financial assessment and potentially provide a financially-safe way for IA clients to earn while retaining IA reliability.

This recommendation could also be combined with implementing a program similar to the Single Parents Employment Initiative (SPEI) in B.C. Under the SPEI, single parents who enter employment training or apprenticeship have their income assistance benefits frozen for the duration of their training program. This is combined with the coverage of child care costs (which Nunavut already has through the Day Care subsidy) and with coverage of the cost of transit (which would have to be modified for the realities in Nunavut) for the duration of the training program.

While this reform would likely increase the cost of IA, as we saw, only 21% of all IA casefiles assessed have earned income. A behavioral response is expected (i.e., persons transitioning into formal employment when they would not have before); however, given the low-level of employment opportunities, we doubt the behavioral effect would be large.

Recommendation 12: Annualize the earnings exemption and set the BRR above the exemption at 50%

Instead of exempting \$200 or \$400 of earned income per month, IA should exempt \$2,400 or \$4,800 per year. Benefits should be reduced by a flat 50% of earnings above this threshold. This would make it easier for IA recipients to know how much of their earnings they will get to keep and would ensure that additional earnings always benefit the person working. For some individuals, it would also facilitate short-term or seasonal employment that could make a significant difference.

Productive Choices

While the list of programs or activities an IA recipient may engage in seems broad, it is not. First, the number of wage employment positions in Nunavut is limited. Second, requiring an IA recipient to be “employed” in a traditional activity (i.e., monetizing the activity) is not aligned with IQ principles of Pijitsirniq, Ikajuqtigiinni, Pilimmaksarniq, and Qanuqtuurniq, and is not aligned with the BI principles of respect and social inclusion. Third, education and training in the Western sense (e.g., credentialed program, post-secondary, apprenticeship, continuing education, etc.) is limited in Nunavut, often requiring students to leave their home communities or leave the territory entirely. Limiting education and training to Western concepts/institutions of education and training does not reflect the IQ principle of Pilimmaksarniq.

Recommendation 13: Re-imagine, expand and rename productive choices

Productive choices could be maintained in the regulation as a tool to provide to IA clients tools, resources, and support to engage in their community. But they should be re-imagined as a tool to support the client in achieving their objectives, connecting them with resources, and as part of a strengthened “one client, one plan” approach. Re-imagined this way, productive choices could be expanded to include any type of participation in the community that the IA client chooses to participate in, whether it can be monetized or not. These expanded productive choices could be specifically enumerated in the regulations (and updated regularly to reflect client choices), but that would not be necessary if the following recommendation is enacted.

While the Regulations and Manual refer to these programs and activities as “productive choices” this choice of language is not reflective of the re-imagined productive choices outlined above. Whatever language used should better reflect concepts of Inuit Qaujimajatuqangit—such as contributing, development of skills, being innovative and resourceful—and should de-emphasize “productivity”, as “productive” is more aligned with concepts of the wage economy and the labour market.

Recommendation 14: De-link productive choices and access to IA benefits

Re-imagined as above, the inability of a client to engage in a productive choice should not be grounds for IA refusal. Rather, it should be grounds for a discussion of what barriers the IA client faces and what can be done to better support them.

The underlying idea linking these recommendations is to frame productive choices not as a responsibility of the client for which they will be penalized if they cannot meet, but rather a responsibility of the individual, IA program and the community to foster and support the IA client in contributing to the community in the manner they are able to and choose to. It would reduce monitoring and increase support.

Benefits

Recommendation 15: Index benefits to inflation

Currently, the basic allowance is not indexed to inflation. Given that the basic allowance is intended to cover food and clothing, this means that IA clients can purchase less and less of these necessities. This reduces the economic security and social inclusion of IA clients. Indexing the basic allowance to inflation will enhance economic security and social inclusion.

Recommendation 16: Re-asses benefit levels when the MBM North is released.

The payment received by IA clients is low, particularly for single adults. Further, almost 100% of IA clients live in income poverty and the average gap ratio is high. Increasing the basic allowance to align with the MBM low-income threshold for the north would enhance economic security and social inclusion.

Recommendation 17: Expand the education benefit and drive uptake

One of the challenges we heard was that individuals were required to participate in “productive choices” but did not have the resources to be able to do so. Yet there were no recipients of the education and training benefit in 2018. This benefit should be reviewed to understand whether this under-use is justified and whether this under-use is a result of systemic issues and increased use could help support a holistic person.

The education and training benefit should be expanded to cover the cost of tuition, tools, inputs, child care, etc. required to participate in any activity identified under a revised “Productive Choices” framework (these need not be enumerated, as they may be client-driven). IAWs should be instructed to encourage individuals to access these resources whenever they would be useful. If rationing is required

because the funds do not meet demand for them, this could be done on a first-come first-served model, whereby a set amount of money is available in a fiscal year, or by limiting how often one person can access the fund. It should not be rationed as a percentage of the amount requested, as this will typically result in people not being able to effectively participate or participate at all.

Recommendation 18: Revamp the Emergency Extended Benefit

Given the under-use of the emergency benefit by IA recipients, either the emergency benefit should be revamped or a new crisis supplement should be included. This crisis supplement would be for IA recipients who, despite receiving IA, have a financial crisis and are unable to afford food, clothing, utilities, or other basic necessities.

Recommendation 19: Review benefits for IA recipients “living with family and friends”

As we showed, many IA recipients are living with family and friends and do not receive an accommodation allowance or a fuel/utilities allowance. However, the family and friends they are living with are likely paying for accommodation and fuel/utilities, and the IA recipient may be paying them/helping them with expenses under an informal agreement to stay with them. For IA recipients living with family and friends, we recommend reviewing their IA benefits and costs. If warranted, a new allowance for those living with family and friends could be introduced to reflect they may be in these informal living agreements and to help them contribute to the living arrangements.

Recommendation 20: De-couple tax filing and receipt of IA benefits and support tax filing

While receipt of IA benefits has been tied to tax filing, it is unclear whether this is supported by the regulation. Further, compliance with tax filing is complex. Those who grapple with tax filing should be respected, not punished. On the other hand, many important federal and territorial benefits are only accessible through tax filing. Thus, IA clients should be encouraged and supported to file taxes. IAWs should have copies of the simplified tax form 9002 (Let us help you get your benefits!) and child benefit applications to distribute.

While supporting IA clients to file taxes, the Nunavut government could also lobby the federal government to institute automated tax filing. That is, for those who receive a T5007, their tax filing is generally straight-forward (i.e., there is less diversity of income sources) and the Canada Revenue Agency (CRA) already has the information to file their taxes. Automated tax filing would ensure that those with low-income receive tax benefits they are entitled to (Petit et al. 2021). Furthermore, the

Nunavut government could also lobby the federal government to provide tax filing forms in Inuktitut and Innuinaqtun.

Recommendation 21: Consider delivering benefits to the individual as opposed to the family

Currently, IA is delivered to the casefile: the size of the casefile unit and the casefiles' total income matters when calculating the IA benefit. Basing the IA benefit on the casefile is rooted in the assumption that income and assets are shared more or less equally within a casefile unit. It is also based on the Western concept of a nuclear family.

However, on the one hand, income and assets are not always shared equally. Intimate partner violence (IPV) is a particularly salient issue in Nunavut (Pauktuutit Inuit Women Canada and Comack). Casefile-based IA benefits may result in the exacerbation of power imbalances within households, thereby reinforcing dynamics of dependency and abuse (Cameron and Tedds 2021).

It should be noted, however, that delivering IA to individuals may not address the issue of IPV. It is atypical for a person in an abusive household to hold any financial power or control of financial resources, and thus it is unlikely that such individuals would benefit from the income transfer (Jagannathan and Keshner 2020); indeed, in many cases individuals do not even have access to or control over a bank account (Cameron and Tedds 2021).

On the other hand, delivering benefits to the individual as opposed to the family would eliminate the need to define who is included in a casefile and it would eliminate the imposition of Western concepts of "family". The benefits could be tied to the individual and, in the case of dependent children under 18 years of age, only one adult (e.g., the mother or the primary caregiver) would receive IA on behalf of the child.

In either case, it should be noted that delivering IA to an individual as opposed to the family may increase statistical inequality and program costs.

Hunters Program

Recommendation 22: Work with NTI to develop a comprehensive IA hunters program that can better meet the needs of hunters through one localized touch-point

Hunters are important to Inuit communities. Yet the IA program fails to recognize their importance by systematically making hunting difficult. The IA program requires hunters to monetize their activities (e.g., become "employed" in traditional activities), does not appear to net out the cost of hunting from the income calculation, and does not provide a high enough level of benefits to support hunting. Along with IA, there are other programs that support hunters in the territory including the Harvest Equipment

Program and the Community Hunt Program funded by NTI and delivered by local Hunter and Trapper Organizations (HTOs).

We recommend that a hunter-specific IA stream be created. A hunter-IA stream could include a partnership between the Department of Family Services and NTI. The purpose of such a partnership would be to create a one-stop hunter program (administered and delivered through already-existing IA offices) that would reduce administration costs and create one touch-point for hunters (instead of multiple programs and program applications). The purpose of such a program would be to promote the procurement and sharing of country food through increased financial support of individual hunters and the hunting community. A shift in thinking by policy makers would be required to ensure that such a program does not systemically undermine hunters. As the literature finds, active hunters not only produce more country food than is needed for their household but also for more people than their household (Harder and Wenzel 2012), and those with higher income hunt more and share country food more regularly (Searles 2016). Lower-income households rely on customary sharing mechanisms and relationships to meet their food needs (Harder and Wenzel 2012). This program would support hunter's income so more country food could be shared.

Operationally, under s. 5(1) of the Act, the Director's authorities could be delegated to communities for the purpose of administering a hunting program (the remaining Director's authorities for non-hunters could remain as is). HTOs could also take an active role, identifying who the hunters are, what individual hunter's skill levels and needs are, and what the community of hunter's needs are.

Such a program could be rolled out as a pilot program first. For example, the literature suggests that Clyde River have established hunter organization structures, with the family head having the authority to organize and control purchase, repair, and maintenance of snowmobiles (Searles 2016). Testing a pilot in a community such as Clyde River that has stronger organization would potentially ease the initial design and implementation of a program.

Youth

Recommendation 23: Develop a young adult-specific IA program that focuses on learning and transitioning into adulthood

As shown in Figure 3 above, single adults receiving IA in Nunavut are most likely to be ages 18 to 24. In a previous review of Nunavut's IA program, the recommendation was made that the eligibility age for IA should be increased from 18 to 19. The impetus was that when students turn 18, they drop out of school to collect IA instead of engaging in productive choices. Thus, moving the eligibility age up to 19 would encourage them to complete school and/or engage in traditional activities or other education and training (Nunavut Department of Family Services 2016). This approach positions 18 year-olds as either a child, dependent on their parents, or an adult, expected to engage in a productive choice, which in the present IA system is primarily wage earnings. Young adults ages 18 to 24 are complex, being not quite a child and not quite an adult: they are in an important state of transition, and it is a time where it is

important to support them along their current and future paths. Different welfare states treat them differently (Chevalier 2015).

On the one hand, moving the eligibility age for IA up to 19 places the responsibility for 18 year-olds on parents, which may be potentially financially difficult. This may be economically unstable for the parents and it may not be respectful of the 18 year-old's family and economic situation. On the other hand, encouraging 18 year-olds to continue learning is an important investment, both for them, their family, and the community. It promotes social inclusion and future economic security.

We recommend that the age of eligibility not be increased due to potential financial hardship of the parents. But we also recommend that a young-adult specific IA program be implemented. For young adults who desire to independently claim IA and not be dependent on their parents' IA receipt, IA could be conditional on learning, broadly defined to include completing high school (where this makes sense), education and training programs (e.g., ALTS, trade and apprenticeship programs, etc.), mentoring in traditional activities and learning from knowledge keepers (in partnership with the Department of Culture and Heritage and their youth services programs), and learning life skills through new life skill programs. Included in this program would be more intensive case management, including a substantial strengthening of the "one client one plan" approach to put youth in touch with those at the school whose job is to support youth, career counsellors, and elders (dependent on their stage of education and choice). These plans and case management could also be done in consultation and discussion with the parents and other persons integral in the young adult's life (where appropriate). The first failure to meet the education condition could trigger increased support, e.g., increased discussions with elders, important persons in the young adult's life, career counsellors, other young adults, etc. and further development/refinement of action plans. Additional failures could trigger benefit reductions or being added to a parent or guardian's IA casefile (e.g., as a dependent child, situation dependent on the input of important persons in the young adult's life).

This would differ from our recommendations above which suggested that that IA should not be conditional on productive choices: this conditionality would only apply to young adults who independently claim IA. It would focus on increasing the proportion of young adults who choose education and training as their productive choice, with education and training broadly defined to include any form of learning. It would also likely require a strengthening of young adult-related programs in the communities and a close relationship between those programs and dedicated young adult IA Officers. It should be implemented in conjunction with recommendation 14: enhancing the education benefit.

Conclusion

In conclusion, IA needs to be re-designed as a program for Inuit by Inuit. In its current form, IA does not meet Inuit values, is not respectful of Inuit culture, does not promote economic security, and is overly focused on administering complicated definitions of income to determine cheque amounts. Its labeling as a "funder of last resort" creates a program that stigmatizes, and forces clients to make choices they may not have otherwise made and that are not necessarily in the individual's nor community's best interest.

While reform of IA is not a fully hands-off basic income administered through the tax system, as many wish for, it is still a form of basic income. Since the administrative structure already exists and case management is done at the community-level, it can provide not just income but holistic, relational supports to create a more capable human being. Some of the administrative reforms proposed in this paper cost little, but would help align cash transfer supports in Nunavut with the principles of basic income and with Inuit Qaujimajatuqangit, we believe as much as or more than a tax-administered basic income. The challenge in either a reformed IA or a tax-based basic income will be to increase benefit levels to a point where the principle of economic security is not completely violated. We recommend doing that via an increase in the base IA benefit, increased access to the disability incidental and the forthcoming Canadian Disability Benefit, and a temporary freezing of IA benefits if formal employment is obtained.

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