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Reforming Disability Income Support in Alberta for Employment and Equity

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EXECUTIVE SUMMARY

The Government of Alberta has proposed the Alberta Disability Assistance Program (ADAP) to reform its disability income support system, restructuring the current Assured Income for the Severely Handicapped (AISH) program into a two-tiered system. ADAP would support individuals assessed as able to work while AISH would continue to serve those assessed as unable to work. The reforms involve changes to benefit amounts, earnings exemptions, appeal rights and access to medical benefits. The government's stated objectives, improving fiscal sustainability and increasing employment participation, reflect legitimate policy priorities, given AISH's \$1.6 billion annual cost and the recognized need for better employment supports among people with disabilities.

However, the analysis presented in this paper indicates that ADAP's specific design features are unlikely to achieve these objectives and may undermine both goals. Drawing on the 2017 and 2022 Canadian Survey on Disability, the paper shows that many Albertans with disabilities experience financial insecurity, poor or fair mental health and precarious employment, realities that do not align with ADAP's assumptions about work capacity. International evidence from the United Kingdom's work capability assessments demonstrates that similar two-tiered systems have produced adverse mental health outcomes, high rates of assessment error and administrative inefficiency.

The paper further identifies two structural gaps in ADAP's design: the absence of employer-side obligations to create accessible workplaces, and policy design choices, including reduced benefit levels, lower earnings exemptions and weakened appeal mechanisms, that may discourage employment rather than support it.

As an alternative, the paper recommends a unified, capability-enhancing disability income program in which all recipients receive a single base benefit of \$1,940 per month with opt-in employment supports, a higher earnings exemption of at least \$800 per month, gradual benefit reductions and continued access to medical benefits. Building on this model, the paper presents nine policy recommendations organized across program redesign, procedural fairness, employer-side reforms and long-term foundational changes, and outlines concrete first steps for implementation.

KEY MESSAGES

- The proposed Alberta Disability Assistance Program (ADAP) may reduce income adequacy for people with disabilities through lower benefit levels, reduced earnings exemptions and weakened appeal mechanisms.
- While ADAP emphasizes employment activation, it does not address the workplace barriers and policy design choices that limit access to meaningful and sustainable employment.
- International evidence shows that work capability assessments, central to the ADAP model, are associated with adverse mental health outcomes, high rates of assessment error and administrative inefficiency.
- A unified capability-enhancing disability income program with a single adequate base benefit and higher earnings exemptions offers a more effective, evidence-based approach to supporting both income security and employment participation.

SECTION 1. INTRODUCTION

Alberta is undertaking significant reforms to its disability income assistance system. Central to these changes is the proposed introduction of the Alberta Disability Assistance Program (ADAP) through Bill 12 (Inclusion Alberta 2025a; Alberta n.d.-a). Set for implementation in July 2026, these reforms respond to the policy objectives of fiscal sustainability and employment activation, which are legitimate goals that disability communities themselves have sought to realize through better support systems (Wehman 2011; Jetha et al. 2023). The mechanism for achieving these goals involves a restructuring of the current Assured Income for the Severely Handicapped (AISH) program into a two-tiered system. Under this model, ADAP targets individuals deemed “able to work,” while a modified AISH stream serves those assessed as “unable to work” (Alberta 2025d).

The transition to ADAP occurs alongside several intersecting policy changes that further reshape the landscape of disability income security in Alberta. These include the clawback of the Canada Disability Benefit and increased rent for AISH recipients living in community housing (Alberta 2026c, 2; Inclusion Alberta n.d.; Inclusion Alberta 2025b). This latter change was triggered by the removal of a \$735 monthly exemption, which previously shielded a portion of AISH benefits from rent calculations, effectively increasing rent contributions from 17 per cent to 30 per cent of a recipient’s monthly income (Bellefontaine 2025). Together, these changes form the context for ADAP. The question this paper addresses is not whether the government’s goals of fiscal sustainability and employment activation are worth pursuing, but whether ADAP’s specific design choices are well-positioned to achieve them.

Three analytical questions are essential to this evaluation. First, how do efforts to reduce program costs intersect with a recipient’s ability to meet basic needs, particularly when accounting for the additional costs associated with disability? Second, to what extent might stricter eligibility criteria and reduced income levels impact the health and stability required to sustain meaningful work, and does this create conflict with the program’s goal of promoting employment? Third, in what ways might the streamlining of eligibility and oversight affect an individual’s capacity to appeal decisions or access the full range of supports to which they are entitled? Ultimately, these inquiries raise questions about the distribution of financial and administrative risk between the state and people with disabilities.

This paper argues that a unified, capability-enhancing disability income support model achieves the government’s stated objectives more effectively than the proposed two-tiered ADAP system. The analysis first situates ADAP within the current provincial and federal policy landscapes before exploring prior research on employment and disability, work capability assessments and the social model of disability. After outlining the data and methods, the paper evaluates the government’s rationale for reform alongside an overview of the structural design of ADAP. It then presents an empirical analysis drawing on the Canadian Survey on Disability to characterize the population ADAP would affect, laying the foundation for the paper’s primary analysis: a policy analysis of ADAP’s structural design against four key policy criteria: effectiveness, equity, efficiency and political and administrative feasibility, while integrating comparative evidence from the United Kingdom (U.K.). The paper concludes by weighing these findings against three distinct policy options and presenting nine recommendations to establish a more effective and sustainable disability income system.

SECTION 2. THE POLICY CONTEXT: DISABILITY SUPPORT IN ALBERTA AND CANADA

ALBERTA'S HISTORICAL POSITION

To fully understand ADAP's potential impact, these reforms must be situated within the province's broader policy context. While Alberta's history was originally defined by the brutal treatment of people with disabilities, the province eventually transitioned into a national leader in disability financial assistance (Sonpal-Valias 2019). Historically, Alberta has offered one of the highest disability income supports in Canada. According to Maytree's 2024 Welfare in Canada report, an unattached single adult receiving AISH has a total annual income of \$23,732, the highest in the country (Laidley and Oliveira 2025, 13). The next closest province, Newfoundland and Labrador, provides \$21,107, a difference of \$2,625 (Laidley and Oliveira 2025, 13). Other provinces lag further behind, including British Columbia at \$19,845 and Ontario at \$17,826 (Laidley and Oliveira 2025, 13). These comparisons highlight that AISH has long set a provincial high-water mark, reflecting Alberta's fiscal capacity to deliver comparatively stronger disability supports. Any reduction in benefit levels under ADAP signifies a departure from this standard.

THE NATIONAL POLICY ENVIRONMENT

At the national level, recent policies have increasingly prioritized employment activation and financial security for persons with disabilities. Central to this effort is Canada's Disability Inclusion Action Plan, introduced in 2022, which targets poverty and economic exclusion through its primary pillars of financial security and employment (Canada 2022). This plan has launched key initiatives such as the Employment Strategy for Persons with Disabilities, aimed at closing the national employment gap by 2040, and the Canada Disability Benefit (CDB; Canada 2022). The CDB provides a monthly supplement of \$200 to working-age, low-income individuals to alleviate deep poverty (Canada n.d.). Notably, Alberta is the only province to clawback the CDB for those on provincial support by treating the CDB as non-exempt income (Alberta 2026a, 2); consequently, an ADAP recipient entitled to the \$1,740 maximum effectively receives only \$1,540 from the province (Disability Without Poverty n.d.). These federal actions align with Canada's obligations under the United Nations Convention on the Rights of Persons with Disabilities, which mandates binding social protection and income security across all levels of government.

THE PROVINCIAL POLITICAL AND ECONOMIC LANDSCAPE

From a provincial perspective, the Government of Alberta's 2026 budget outlines a projected deficit over the next four years, reflecting ongoing fiscal pressures tied to low global oil prices and economic uncertainty (Ercolao 2026; Yousif 2026). Concurrently, rapid population growth has surged demand for core public services, particularly in health care and education, contributing to increased expenditures in these sectors (Edmonton Chamber of Commerce 2026; Ercolao 2026; Yousif 2026). In response, the budget includes some fiscal restraint and targeted spending, with more limited growth in social supports (Ercolao 2026). A consistent theme in the budget and provincial policy is an emphasis on employment activation (Alberta 2025b; Edmonton Chamber of Commerce 2026). This is exemplified by the Alberta Jobs Strategy, which seeks to strengthen labour force participation, particularly among youth and underrepresented groups, to drive economic growth and ensure long-term fiscal sustainability (Alberta 2025b, 12).

These broader pressures directly influence the reform of provincial disability supports. With over \$1.6 billion allocated to AISH in the 2025 Fiscal Plan, disability income assistance stands as one of Alberta's most significant social expenditures (Alberta 2025c). As caseloads have risen steadily

since 1997, organizations such as the C.D. Howe Institute have urged a review of the program's design to ensure long-term sustainability (Mahboubi and Ragab 2021). Specifically, the institute highlighted concerns regarding the program's capacity to facilitate employment participation and close the disability employment gap (Mahboubi and Ragab 2021, 5). The disability community shares the same desire for improved employment outcomes (Shahidi et al. 2023; Carmichael and Clarke 2020; Wehman 2011; Jetha et al. 2023). As outlined in the Alberta Jobs Strategy, the provincial government has prioritized employment activation for persons with disabilities, leveraging ADAP as the primary mechanism to achieve this goal (Alberta 2025b). The central analytical question, therefore, is whether ADAP's specific design is capable of closing this employment gap.

ALBERTA'S LEGISLATIVE GAP

Alberta remains one of only two provinces without comprehensive accessibility legislation. In contrast, provinces such as British Columbia and Manitoba have enacted the *Accessible British Columbia Act* and the *Accessibility for Manitobans Act*, which impose legal obligations on governments and organizations to proactively identify, remove and prevent barriers (Alberta Civil Liberties Research Centre 2025). Without similar legislation, Alberta continues to rely on a reactive, complaint-based system that lacks mandatory, sector-wide employment accessibility standards. This lack of a regulatory framework sets the stage for the employer-side challenges analyzed in Section 7 and the broader legal implications in Section 8.

SECTION 3. PRIOR RESEARCH AND CONCEPTUAL FOUNDATIONS

DISABILITY, EMPLOYMENT AND INCOME SUPPORT: WHAT THE EVIDENCE SHOWS

The literature shows that work, whether paid or unpaid, holds significant value for people with disabilities (Carmichael and Clarke 2020; Wehman 2011; Borg and Kristiansen 2008). In a study examining the experiences of people with disabilities and their families, participants emphasized that employment carries multiple forms of meaning and benefit; for many, "work could be a lifeline" (Carmichael and Clarke 2020, 772). Employment can provide structure, build confidence and self-respect and create opportunities to contribute to society (Borg and Kristiansen 2008, 516–17; Kuiper, Bakker and Van der Klink 2016, 181–82; Carmichael and Clarke 2020). A longitudinal study from Australia found that individuals with disabilities who engaged in stable, paid employment consistently reported higher baseline mental health and personal well-being than their unemployed peers; furthermore, their scores steadily improved over time once stable work was sustained (Devine et al. 2022, 6). Work also offers crucial financial benefits, supporting greater independence and security, particularly given the extra costs associated with disability. In many cases, the primary barrier to employment is structural, not motivational. Barriers arise from labour markets, workplaces and policy systems that fail to accommodate diverse needs (Wilton and Schuer 2006; Arciprete and Ciani 2025).

Disability scholar Michael Prince (2009) observes that Canadian disability policy has historically been fragmented, siloed and under-resourced. Traditionally, these policies have treated disability as a private matter rather than a structural condition requiring a systemic public response. This approach has relied on a binary "disabled enough/not disabled enough" framework, which fails to account for the fluid and fluctuating nature of many disabilities (Prince 2009). This policy gap is exacerbated by structural shifts in the economy. As Wilton and Schuer (2006) argue, the intensification and precariousness of modern employment have narrowed accessible labour market positions. These changes simultaneously raise expectations for full-time, continuous

participation that many individuals with disabilities cannot meet (Wilton and Schuer 2006; Soldatic 2011). Ultimately, the employment gap is not a deficit of individual capacity or motivation, but a structural failure that demands structural responses.

WELFARE-TO-WORK AND WORK CAPABILITY ASSESSMENT SYSTEMS

ADAP relies on work capability assessments, which have been widely adopted internationally as a policy tool. These assessments act as gatekeeping mechanisms, determining eligibility for disability income support (McAllister 2019). Across OECD countries, their use has expanded alongside rising disability caseloads and associated fiscal pressures (Stafford et al. 2019, 3). In response, governments have increasingly tightened eligibility criteria, using assessments to regulate access to benefits (McAllister 2019, 328; Stafford et al. 2019, 3). At the same time, work capability assessments have been used to support broader welfare-to-work agendas that prioritize early labour market participation (Stafford et al. 2019). Within this policy framework, employment is positioned as a mechanism to reduce long-term reliance on income supports, shifting the function of assessments from solely determining eligibility towards encouraging labour market activation (Stafford et al. 2019; Carmichael and Clarke 2020; Gjersøe 2015).

The literature identifies four recurrent patterns among work capability assessments. First, binary classifications of individuals as “able” or “unable” to work are widely criticized for failing to capture the episodic and context-dependent nature of disability, resulting in misclassification (Baumberg et al. 2015). Research shows that the process is more designed for assessing physical impairments, rather than individuals with mental health conditions or intellectual disabilities, or Autistic individuals (Galloway, Boland and Williams 2018; Irvine and Haggart 2023).¹ Second, the assessment process itself causes psychological harm, particularly for those with mental health conditions, in ways that can worsen the conditions most relevant to employment (Barr et al. 2015; Griffiths and Patterson 2014, 63). Third, these models tend to locate responsibility for employment outcomes within individuals, despite research showing that structural and workplace barriers are primary determinants of labour market participation (Carmichael and Clarke 2020; Arciprete and Ciani 2025).

Finally, there is a lack of academic evidence that work capability assessments can even assess “work capability” (Geiger et al. 2017). While many countries rely on functioning-based assessments, with some testing of occupational tasks, research suggests that incapacity is often contextual (Cronin et al. 2013). Baumberg et al. (2015, 24) note that “few medical diagnoses or functional impairments are so severe that you cannot do any jobs whatsoever,” emphasizing that “incapacity” arises from a mismatch between work environment demands and the individual (Geiger et al. 2017; Cronin et al. 2013).

In an effort to move past these established patterns, there has been an overall shift among OECD countries towards more holistic, job-matching-oriented systems (Sengers et al. 2022). A comparative study by Sengers et al. (2022) identifies this trend in six of the eight countries examined, where work capability assessment findings are used to facilitate sustainable, “good” job matches. Their analysis reveals, however, that the U.K. and the United States remain the two notable exceptions; in these jurisdictions, work capability assessments are still used exclusively for program eligibility with no application of results for job matching (Sengers et al. 2022). A similar pattern is reflected in the design of Alberta’s ADAP, where assessments appear to be used primarily for program placement. While employment supports are available, there is limited indication that assessment results are directly used to inform job matching.

¹ To respect and acknowledge the unique community and culture of Autistic individuals, this paper intentionally capitalizes “Autistic,” following the language guidelines established by the Autism Alliance of Canada (2025).

The U.K.'s Work Capability Assessment (WCA), introduced under Employment and Support Allowance, represents one of the most extensively studied implementations of work capability models. Given similarities between the WCA and Alberta's proposed ADAP/AISH design, it provides a useful jurisdictional comparison. Its outcomes, including elevated rates of misclassification, adverse mental health effects and substantial administrative costs, show how a similar policy design can manifest in practice. Section 7 draws on this case in detail to assess how similar design features may translate into consequences for Albertans.

THE SOCIAL MODEL OF DISABILITY AS AN ANALYTICAL LENS

This paper applies the social model of disability (Oliver 2013) as its primary analytic lens. Under this model, social, economic and institutional barriers, rather than individual impairments, create disability (Shakespeare 2006). Applied to employment policy, this framework shifts attention from the medical model of disability's focus on individual work capacity to the structural conditions that constrain or enable participation, such as employer practices, workplace design, benefit system incentive structures and legislative frameworks. Both Prince (2009) and Wilton and Schuer (2006) apply this framing to show how Canadian disability policy has systematically failed to address structural sources of exclusion. The social model does have criticisms, including critiques that it insufficiently captures the lived experiences of pain and chronic illness, and that it can obscure intersectional inequalities, or set unattainable goals of removing all barriers (Owens 2014; Haegele and Hodge 2016; Thorneycroft 2024). Despite these limitations, the model is essential to this analysis because it reframes the research inquiry by prioritizing ADAP's structural design. Rather than asking "Can this person work?" the paper instead asks: "What structural barriers does the design of ADAP address or fail to address, and what does the available evidence suggest about the consequences of these choices?" This shapes which CSD data are reported, how ADAP's design features are evaluated and what the recommended alternative looks like. While ADAP/AISH does not explicitly frame insufficient income as an individual failure, two-stream eligibility systems can be interpreted through longstanding social policy distinctions between "deserving" and "undeserving" recipients, where eligibility is sorted by perceived employability or medical legitimacy, similar to concerns raised about OW/ODSP under Harris-era reforms (Lightman et al. 2009; Little 1994).

SECTION 4. DATA AND METHODOLOGY

This paper draws on two primary types of evidence: quantitative data on disability prevalence, employment and income in Alberta and a comparative policy analysis based on four policy criteria.

The empirical analysis uses data from the 2017 and 2022 cycles of Statistics Canada's Canadian Survey on Disability (CSD). Statistical analyses were conducted using the CSD's master file accessed through a Statistics Canada Research Data Centre (RDC). All outputs were vetted in accordance with RDC disclosure rules. The CSD is a national postcensal survey that collects information on the experiences of Canadians aged 15 years and older whose daily activities are limited by a long-term condition or health-related problem. The survey captures data on disability type, severity, employment status, income, accommodation needs and barriers to participation.

Alberta-specific estimates are reported where sample sizes permit reliable inference. Where Alberta-specific cell sizes are too small, particularly for subgroups including developmental disabilities, learning disabilities and Autistic individuals, national estimates are used and this is noted explicitly. The social model of disability shapes which dimensions of the CSD data are examined. Rather than treating disability prevalence as a static count, the analysis focuses on

employment patterns, accommodation needs and income levels that reflect structural conditions in Alberta's labour market and policy environment. The CSD sampling frame excludes people living in collective dwellings (e.g., special care homes, boarding homes). As a result, our descriptive profile may underrepresent working-age Albertans with disabilities who are in institutional or congregate settings and who may still engage in paid work. We flag this limitation explicitly because it affects any attempt to map "who will be affected" under ADAP.²

The policy analysis component examines ADAP's structural design features, eligibility criteria, benefit levels, earnings exemptions, appeal mechanisms and employment supports, within an evaluative framework grounded in the social model of disability (Oliver 2013) and four policy criteria: effectiveness, equity, efficiency and political and administrative feasibility (Bardach and Patashnik 2024). The analysis incorporates comparative evidence from international disability income systems, positioning the U.K.'s Work Capability Assessment (WCA) as the primary reference case. The structural similarities between the U.K. and ADAP designs, combined with the depth of available independent research, make the U.K. an ideal case for comparison.

Our comparative policy analysis was anchored in Bardach and Patashnik's (2024) criteria-based framework. Selection of comparative evidence followed two practical criteria: 1) jurisdictions with institutional designs most structurally similar to ADAP/AISH (U.K. WCA as the primary case) and 2) jurisdictions with sufficiently extensive, independently produced evaluation literature to support triangulation across effectiveness, equity, efficiency and feasibility. Effectiveness and equity capture the distributional goals of a disability income program. Efficiency reflects the fiscal and administrative constraints any reform must navigate. Political and administrative feasibility ensures that recommendations are actionable within Alberta's near-term institutional context. Together with the social model, these criteria form a complementary analytical framework: the social model orients the analysis towards structural barriers, while the four criteria structure the comparative assessment of policy options in Table 2.

This research employs a narrative review methodology to synthesize evidence from a diverse range of sources. Literature was identified through purposive searches of academic databases, including Google Scholar and the University of Calgary library, alongside targeted web-based searches for grey literature. As details of the proposed reforms were still evolving at the time of writing, government discussion guides, legislative documents and advocacy reports were included to capture policy commitments not yet reflected in peer-reviewed publications. Together, these sources inform the assessment of ADAP's likely impacts and the development of alternative policy recommendations.

The analysis team includes a researcher with lived experience as a late-diagnosed Autistic woman. Where relevant, this informs the paper's attention to the experiential and structural dimensions of disability, including the significance of employment to well-being, the challenges of inconsistent working capacity and the role of workplace culture in shaping inclusion, that quantitative data may not fully capture.

Several limitations of the CSD should be noted. The survey is cross-sectional, which precludes causal inference. Disability status, mental health and employment outcomes are self-reported, introducing potential measurement variability. Alberta-specific subgroup estimates, particularly for developmental disabilities, learning disabilities and autism, are based on small sample sizes, limiting precision. The CSD captures the broader population of Canadians with disabilities rather

² We did not conduct a provincial, disability-specific estimate of collective-dwelling residents due to data availability constraints (i.e., the CSD cannot be disaggregated for collective dwellings). We encourage future work to triangulate ADAP's affected population using non-CSD administrative sources that include collective dwellings.

than AISH recipients specifically; this paper infers relevance based on the substantial overlap between these populations, but direct correspondence cannot be assumed. Finally, the most recent available data (2022) may not fully reflect current conditions as of 2025–2026.

SECTION 5. THE PROPOSED ADAP/AISH MODEL

GOVERNMENT RATIONALE

The Government of Alberta has framed ADAP as a response to longstanding criticisms that AISH does not provide sufficient employment supports for recipients who wish to work while continuing to receive benefits (Alberta n.d.-a). The program’s design is consistent with the notion that people with disabilities will increase labour market participation if they are not financially penalized for doing so — a logic that informs the use of graduated earnings exemptions and the retention of medical benefits. Employment activation aligns with the advocacy of disability communities, who have long sought a system that offers robust employment supports (Jetha et al. 2023). The government’s stated aim to close the disability employment gap is, from this perspective, laudable; it mirrors the desire for a policy architecture that assists and rewards labour market engagement rather than hindering it. Additionally, ADAP reflects a welfare-to-work approach typical of reforms across OECD countries (Stafford et al. 2019), aiming to navigate genuine fiscal pressures by reducing long-term income support costs. However, the central analytical question is not whether these goals are appropriate — they are — but whether ADAP’s specific structural design choices are likely to achieve them.

ADAP OVERVIEW

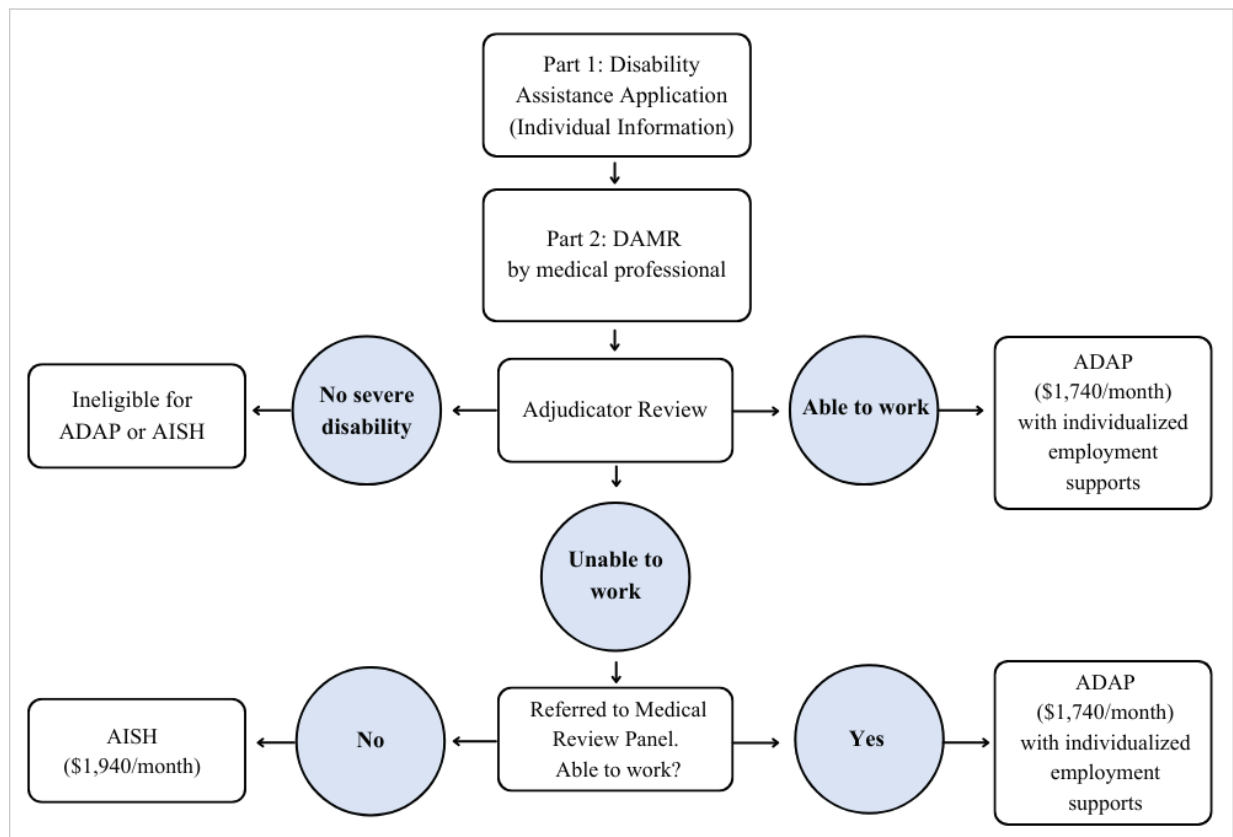
This overview and analysis are based on program parameters released by the Government of Alberta as of writing in June 2026. While ADAP was introduced through Bill 12, now the *Financial Statutes Amendment Act, 2025* (No. 2), the program details are primarily governed by regulations (Alberta 2026b). These regulations were officially filed on May 12, 2026, and are set to be in force on July 2, 2026 (Alberta 2026b). Consequently, all claims in this paper are anchored to the latest official public sources available at this time (Alberta n.d.-a; Alberta 2026b).

The Alberta Disability Assistance Program creates a new stream of support alongside the revised AISH program (Alberta 2025d). ADAP targets individuals with disabilities whom adjudicators classify as able to work, while AISH continues to serve those whom medical professionals classify as unable to work. Individuals meeting specific criteria, such as those with severe developmental disabilities (who are eligible for or receiving the Persons with Developmental Disabilities (PDD) program), terminal or palliative conditions, those residing in continuing care homes or individuals aged 60 or older, will automatically remain on AISH unless they choose to transition to ADAP (Alberta n.d.-a; Mason 2026; Ferenowicz 2026). The nearly 50,000 clients who do not fit these criteria will be transitioned to ADAP in July 2026 but will continue to receive the existing AISH benefits until Dec. 31, 2027 (Alberta n.d.-a; Mason 2026). Recipients who wish to return to AISH must undergo reassessment before that deadline; otherwise, they will receive the lower ADAP benefit (Alberta n.d.-a). The Government of Alberta will financially cover one medical assessment for previous AISH clients who wish to transition back to the program (Alberta 2026a).

The eligibility process has two parts. The individual or a trusted representative completes the first part, the disability assistance application, covering age, residency and financial status (Alberta 2025d, 10). A medical professional, either a primary care provider or a pre-qualified specialist, completes the second part, the Disability Assistance Medical Report (DAMR), documenting medical

conditions, diagnoses, prognosis and their effects on work capacity (Alberta 2025d, 10). Concerns continue to be raised about the role of physicians in filling out these types of disability assessment forms, with questions around whether they are best suited to assess these types of functional limitations (Canadian Medical Association 2024, 3). Access to physicians also remains a key concern, as these are not typically assessments completed at walk-in clinics (Canadian Medical Association 2024, 2). Of particular note is the reality that other programs such as the Disability Tax Credit do allow for some health professions to provide assessments of some functional domains, with Recommendation 7 of the Disability Advisory Committee report indicating a need to expand scope to other providers (Canada Revenue Agency 2025). A disability assistance adjudicator then reviews the DAMR to determine program placement (Alberta 2025d, 10). The programs only accept individuals with a severe disability into ADAP or AISH, though those found ineligible may qualify for other income support programs. Individuals with a severe disability whom the adjudicator assesses as able to work are placed in ADAP. Those assessed as permanently unable to work are referred to a Medical Review Panel for AISH eligibility. This panel is made up of medical professionals such as physicians, nurse practitioners and psychologists (Alberta n.d.-a). While awaiting this review, individuals are temporarily placed in ADAP. If the panel approves them for AISH, the government issues retroactive payments to cover the difference between ADAP and AISH benefits (see Figure 1).

Figure 1. AISH/ADAP Eligibility and Assessment Process



Note: Individuals temporarily placed in ADAP while awaiting Medical Review Panel decision. Retroactive payments issued if approved for AISH.

The programs introduce revised monthly living allowances: \$1,940 for AISH and \$1,740 for ADAP, a difference of \$200 (Alberta n.d.-a; Alberta 2025d). According to the *Financial Statutes Amendment Act, 2025* (No. 2), neither program will automatically index to inflation; future adjustments will be determined by regulation using the Alberta Escalator (Inclusion Alberta 2025a; Alberta 2026b). The current monthly income threshold of \$1,072 will be lowered to \$350 for AISH recipients and to \$700 for ADAP recipients (Alberta n.d.-a; Alberta 2025d). For single AISH recipients, earnings above \$350 face a dollar-for-dollar clawback, regardless of any dependents; in contrast, ADAP uses a household-based phase-out where benefits for a single person with no dependents are gradually reduced until they end at \$45,240 in total annual income. Income includes employment and the Canada Disability Benefit, as well as other income sources, such as spousal support or severance pay, that may be partially or fully included in income calculations (Alberta 2026a; Alberta 2025d). With a focus on employment activation, ADAP offers individualized employment supports, assessments, referral services, simulated worksites, career planning and assistive technology, but imposes no obligations on employers (Alberta 2025d).

A positive feature of the new system is that individuals who earn income disqualifying them from ADAP or AISH will retain health benefits (e.g., prescription drugs, dental care, optometry) until age 65 (Alberta 2026b). According to Section 3.04 of the *Financial Statutes Amendment Act, 2025* (No. 2), the retention of medical benefits applies to a person's cohabiting partner or dependents; this section is also subject to regulations, and eligibility relies on meeting residency and citizenship requirements (Alberta 2026b).

The transition to the dual-program model also entails a fundamental restructuring of appeal rights. Currently, AISH has an independent appeal mechanism, the Citizen's Appeal Panel, to review eligibility, living allowance and benefit decisions. While this panel will continue to handle non-medical appeals, a new Medical Appeal Panel (whose independence is unclear) will review medical appeals for ADAP (Alberta 2025d). It should be noted that the disability assistance adjudicator serves as a first-pass administrative review, determining whether an applicant meets basic eligibility criteria and making an initial classification based on the DAMR. The Medical Review Panel is not an appeals body; it is a substantive eligibility determination body for AISH. A separate body, the ADAP Medical Appeal Panel, handles appeals from individuals who dispute an ADAP classification. Medical Review Panel decisions denying AISH eligibility are final and not appealable.

The programs also affect partner and spousal income. Continuing a longstanding feature of the old AISH program, both AISH (revised) and ADAP reduce benefits based on a partner's income, with exemption amounts that assume partners can provide substantial financial support. This structure can create hardship in households where one partner has a disability and the other earns a modest income, penalizing relationships and compounding financial instability in households with complex needs. Meanwhile, a separate rule taking effect in August 2026 targets households where both adults receive disability income assistance; in these cases, each partner will receive only 88 per cent of the maximum individual benefit. While each program and situation has different exemption amounts, the overall structure assumes that partners can provide significant financial support regardless of household circumstances.

For a summary of key program features for a single person, including data from the old AISH program (Alberta n.d.-c), see Table 1.

Table 1. Key Features of AISH and ADAP for Single Clients (Proposed)

Feature	AISH (Old)	AISH (Revised)	ADAP (New Program)
Eligibility model	Limited ability to earn a living	Assessed as unable to work	Assessed as able to work
Assessment model	<ul style="list-style-type: none"> • AISH applicant form and AISH medical report form • AISH staff member determines eligibility 	<ul style="list-style-type: none"> • Disability assistance application and Disability Assistance Medical Report (DAMR) • Medical Review Panel reviews inability to work 	Disability assistance application and DAMR adjudicator determines work capability
Maximum monthly benefit	\$1,940 (as of Jan. 1, 2026)	\$1,940	\$1,740
Earnings exemption	Single person: \$1,072 per month	Single person: \$350 per month	Single person: \$700 per month
Benefit reduction rate	Single person: 50 per cent reduction between \$1,073 and \$2,009. 100 per cent reduction for \$2,010+	Single person: 100 per cent clawback	Single person: gradual reduction until full deduction at approximately \$45,240 in annual income
Employment supports	Limited; program not employment-focused	Limited; program not employment-focused	Individualized employment supports (e.g., assessments, referrals, simulated worksites, assistive technology); no employer-side obligations
Medical benefits	Clients no longer eligible for AISH are transitioned to the Alberta Adult Health Benefit (AAHB) for at least one year	Retained until age 65, even if earnings exceed eligibility threshold	Retained until age 65, even if earnings exceed eligibility threshold
Inflation indexing	Annually indexed using the standard escalator amount established under the <i>Alberta Personal Income Tax Act</i>	No longer automatic; determined by regulation	No longer automatic; determined by regulation
Appeal rights (non-medical)	Citizen's Appeal Panel	Citizen's Appeal Panel	Citizen's Appeal Panel
Appeal rights (medical)	Citizen's Appeal Panel	Medical Review Panel decision is final and not appealable	ADAP Medical Appeal Panel (independence unclear)

SECTION 6. WHO WILL BE AFFECTED? EVIDENCE FROM THE CANADIAN SURVEY ON DISABILITY

PRE-EXISTING SUPPORT NEEDS ACROSS SUBGROUPS

The implementation of the proposed reforms intersects with the high prevalence of mental health support needs among Canadians with disabilities. According to the 2022 CSD, 38 per cent of people with any disability reported poor or fair mental health, with rates substantially higher among those with developmental disabilities (58 per cent), learning disabilities (62 per cent) and Autistic individuals (54 per cent). Individual adjudicators may evaluate individual circumstances carefully and individual DAMR assessments may reflect genuine clinical consideration. The structural concern is different: the program's binary output, ADAP or AISH, necessarily resolves the considerable variation in disability type, onset, trajectory and functional capacity across the affected population into a single classification. The nuances that inform individual decisions may be well-considered and yet become invisible in a system that produces only two categories. While some of the most vulnerable populations are automatically exempt from work capability assessments, nearly 50,000 AISH recipients will still undergo these evaluations. Considering the widespread prevalence of poor or fair mental health in this community, the requirement to undergo these assessments is concerning; evidence from other jurisdictions suggests that work capability assessments can be particularly harmful for individuals with pre-existing mental health challenges (Barr et al. 2015, 340; Hansford, Thomas and Wyatt 2019).

INTERSECTING INEQUALITIES

These support needs are compounded by intersecting dimensions of inequality (Fuentes et al. 2023; Bixby 2024, 1). Canadian women account for 56 per cent of people with disabilities and face gendered labour market dynamics, including discrimination and lower wages, that contribute to higher poverty rates (Disability Without Poverty 2024, 12-13; Bixby 2024, 8; Chan and Hutchings 2023, 2). Caregiving responsibilities further limit employment capacity: 23 per cent of women provided unpaid care to adults with long-term conditions in 2022 (Statistics Canada 2022), while more than one-third of participants in the "Shape the Canada Disability Benefit" report had a disability themselves while also providing care to another person with a disability (Disability Without Poverty 2024, 12). For young adults with disabilities, particularly the growing cohort of Autistic adults across Canada (average age approximately 27), the absence of effective school-to-employment transitions creates additional barriers that uniform work capacity expectations do not accommodate (Perri et al. 2021, 4; Jetha et al. 2018). These intersecting barriers are not incidental to ADAP's design challenge; they are the structural conditions within which a uniform employment activation framework will operate.

While adjudication and medical review committees are intended to provide a fair, merit-based evaluation of each applicant, the process currently lacks transparency regarding how specific realities are weighted within the assessment. A committee may find an individual "capable of work" based on functional criteria, yet that individual may still face insurmountable labour market barriers, such as the episodic nature of mental health conditions or managing a disability while caregiving for another, both of which affect employment outcomes. The central risk is that a person deemed medically "capable" may still be unable to secure the stable, well-paying employment required to offset a lower ADAP benefit. In these cases, the policy struggles to account for the gap between theoretical work capacity and actual employment viability.

COST OF DISABILITY AND INCOME ADEQUACY

Poverty remains a persistent reality for many Canadians with disabilities (Scott et al. 2022). While the national poverty rate for individuals without disabilities is approximately 8.4 per cent, Canadians with disabilities experience a significantly higher rate of 12.6 per cent (based on 2024 Market Basket Measure data; Statistics Canada n.d.). While Alberta has historically offered among the highest disability benefits in Canada, these income supports remain insufficient; current data indicate that as of 2024, disability assistance falls below the official poverty line in every region across the country, including all Alberta jurisdictions (Disability Without Poverty 2024, 18).

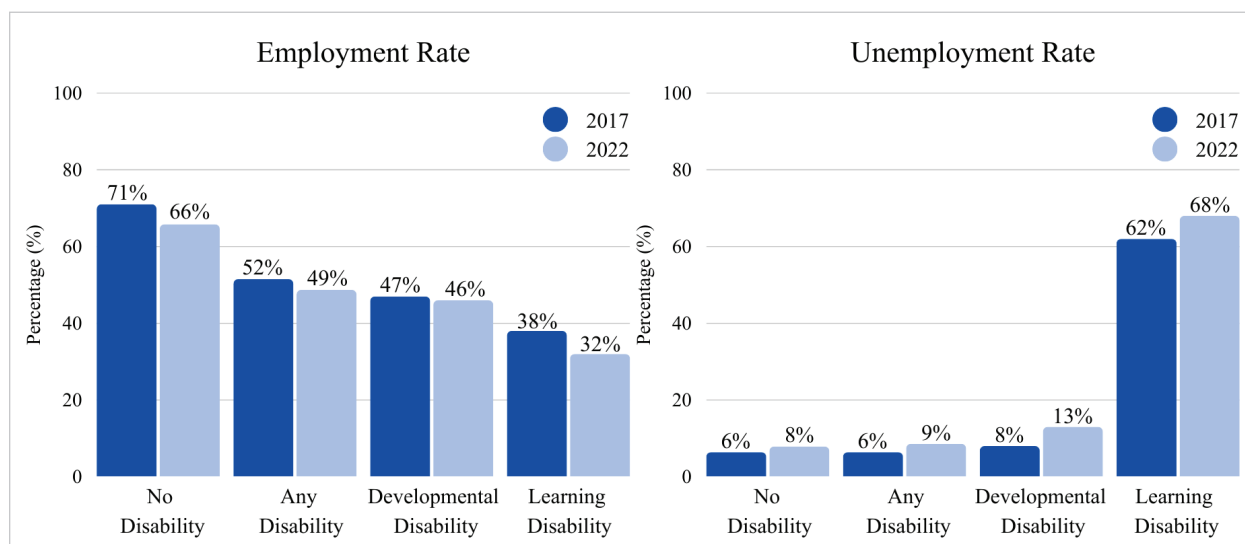
However, these official poverty figures likely underrepresent the true depth of economic hardship because Canada's primary poverty threshold, the Market Basket Measure (MBM), fails to account for the extra costs of living with a disability (Scott et al. 2022). According to the United Nations (2018, 60–61), people with moderate disabilities face living costs approximately 30 per cent higher, and those with severe disabilities face costs more than 40 per cent higher than households without disabilities. These costs include medical equipment, medications, assistive devices, personal support, accessible housing and adapted transportation (Scott et al. 2022, 400; United Nations 2018, 60–61; Canada 2022; Inclusion Canada 2024). The reality is that employment alone is often insufficient to ensure financial security for people with disabilities, particularly in a labour market characterized by instability, exclusion and significant structural barriers (Devine et al. 2022). According to a study done by the University of Melbourne, an overwhelming 74 per cent of individuals with disabilities who secured paid work still experienced ongoing, persistent financial hardships, including struggling to pay basic utilities, afford medical treatments, or buy food (Devine et al. 2022). Any policy that reduces income support levels must therefore be assessed against the full cost of disability, not merely the standard poverty threshold.

Under the previous AISH program, a single recipient (not in a government group home) earning \$900 per month retained their full benefit, resulting in a total monthly income of \$2,840 (\$1,940 + \$900). Under the revised AISH rules, the same recipient earning \$900 would be subject to a \$350 exemption, with a 100 per cent clawback applied to the remaining \$550 in earnings, resulting in a total monthly income of \$2,290 (\$1,940 + \$350). In contrast, the ADAP model is structured to provide more favourable outcomes for those with higher earnings. For someone making \$900 under ADAP, assuming a threshold of \$700 and the graduated clawback based on the government-provided benefit calculator, the same individual would face a modest reduction on \$200 of earnings (\$7.38), resulting in a total income of \$2,632.62 (\$1,740 + \$900 – \$7.38) (Alberta n.d.-b). While this represents a statistically “better” result than the revised AISH rules (\$2,290), the ADAP net outcome remains inferior to the original AISH standard, with a \$207.38 difference. In both cases, the net effect is a meaningful reduction in total monthly income relative to the previous system, for precisely the population the program is designed to support into greater economic participation.

EMPLOYMENT AND INCOME REALITIES

Employment patterns among Albertans with disabilities demonstrate why ADAP's binary distinction between being "able to work" or "unable to work" does not reflect lived labour market realities. Figure 2 presents employment and unemployment rates by disability type for 2017 and 2022.

Figure 2. Employment and Unemployment in Alberta



Learning disability combines unemployed and not in the labour force due to Statistics Canada vetting rules. Source: Canadian Survey on Disability, 2017 and 2022. Note: Alberta-specific estimates.

While the overall employment gap between people with and without disabilities narrowed slightly from 20 to 17 percentage points, this was driven by declining employment among people without disabilities rather than gains among people with disabilities. The gap is particularly stark for individuals with learning disabilities, whose non-employment rate reached 68 per cent in 2022, a level that raises fundamental questions about the feasibility of ADAP's work activation assumptions for this subgroup. Among those not in the labour force across Canada, the majority cited structural barriers: 65 per cent of people with developmental disabilities and 71 per cent of those with learning disabilities identified health conditions as a limiting factor, while others reported inadequate training, discrimination and repeated unsuccessful job attempts. These findings are consistent with a structural account of non-participation: most of those outside the labour force are not choosing to avoid work but face barriers that reformed income support alone is unlikely to overcome.

ACCOMMODATION NEEDS AND SYSTEMIC BARRIERS

Notably, 62 per cent of working-age adults with disabilities across Canada report needing no workplace accommodations at all. Among those who do, the most common needs are flexible hours (20 per cent), modified duties (15 per cent) and remote work options (13 per cent) — modest, low-cost supports that depend on employer willingness to offer them. These are not hypothetical scenarios; these patterns describe the workforce conditions that already constrain employment for the people ADAP is designed to serve. These patterns are consistent with the social model's emphasis on structural barriers. The accommodations that would enable greater participation are modest and frequently inexpensive, but their availability depends on employer willingness rather than individual capacity.

SECTION 7. EVALUATING ADAP: THE U.K. CASE STUDY AND STRUCTURAL ANALYSIS

While Section 3 identifies patterns from the broader literature on work capability assessment systems, including the U.K. as a named example, this section uses the U.K. case in a different way: as a detailed illustration of how these dynamics unfold in the institutional reality of a program structurally parallel to ADAP. The U.K. Work Capability Assessment has been more extensively and independently evaluated than any comparable system, making it a uniquely useful reference for assessing how ADAP's specific institutional design choices may translate into consequences for Albertans.

U.K. SYSTEM DESIGN AND STRUCTURE

The U.K.'s Work Capability Assessment (WCA) under Employment and Support Allowance (ESA) offers a directly relevant case. Like the proposed AISH/ADAP structure, the U.K. system created a two-tiered model: a support group for those assessed as unable to work (receiving higher benefits) and a work-related activity group (WRAG) for those assessed as having some work capacity (receiving lower benefits and facing conditionality requirements; Mehta et al. n.d., 4; Scottish Government 2017, 25). All existing disability benefit recipients were required to undergo reassessment (Barr et al. 2015, 339). This is similar to ADAP's transition, where the majority of income support recipients (approximately 50,000 people) will be reassessed.

EFFECTIVENESS: MENTAL HEALTH OUTCOMES

Comparative data suggest that implementing such assessment frameworks often results in a measurable deterioration of mental health outcomes (Barr et al. 2015; Hansford, Thomas and Wyatt 2019). A major longitudinal study found that in areas where reassessments were more prevalent, mental health outcomes deteriorated significantly: the WCA was associated with an estimated 590 additional suicides over a three-year period, alongside marked increases in antidepressant prescriptions, psychiatric consultations and self-harm (Barr et al. 2015, 341). The period leading up to reassessment is characterized by significant psychological distress (Hansford, Thomas and Wyatt 2019). Clients often find themselves trapped in a paradoxical "performance" of disability (Hansford, Thomas and Wyatt 2019). To secure support, they must maintain the high level of cognitive functioning required to navigate complex bureaucratic hurdles and advocate for their rights; simultaneously, they must demonstrate that they are sufficiently "unwell" to meet narrow functional assessment criteria (Hansford, Thomas and Wyatt 2019). This standard reinforces Prince's (2009) observation that disability supports frequently operate within a binary "disabled enough/not disabled enough" framework. Beyond the assessment itself, the systemic pressure of potential income loss, complex appeal processes and heightened benefit conditionality further erodes mental well-being (Hansford, Thomas and Wyatt 2019). For individuals already living on low incomes, research shows that the mere threat of financial instability significantly increases the risk of mental health deterioration (Barr et al. 2015, 340).

Research indicates that assessment processes of this kind, particularly for individuals with pre-existing mental health conditions, carry risks beyond the binary question of eligibility. As Section 6 documents, a large proportion of those who will undergo ADAP assessment already report poor or fair mental health. Tragically, the psychological distress leading up to this policy change has already been linked to a case of suicide involving an AISH recipient (Villani 2026).

PROCEDURAL FAIRNESS: WHO CONDUCTS THE ASSESSMENTS AND HOW

The U.K. government has outsourced work capability assessments to private contractors — initially Atos and later Maximus — yet core design issues have persisted across providers (Baumberg et al. 2015; Citizens Advice Camden n.d.). Assessments are conducted by health-care professionals (e.g., physicians, nurses, physiotherapists), not the applicant’s treating clinicians, who evaluate claimants against a standardized set of 17 activities known as “descriptors” (Gjersøe 2015). Neither the initial application, completed by the individual (including self-reported limitations and supporting medical documentation), nor the WCA, includes contextual factors, such as skills, age or market conditions that affect employment (Gjersøe 2015, 149). Instead, descriptors focus on discrete functional tasks, such as the ability to lift and move a 0.5-litre carton of liquid or the presence of uncontrolled behavioural episodes that would be considered inappropriate in a workplace setting (Government of the United Kingdom 2025; Gjersøe 2015, 146). Claimants who score 15 points or more are deemed eligible for disability benefits and proceed to a second stage of assessment. This stage applies an additional set of 16 descriptors to help determine whether individuals are placed in the support group or the work-related activity group (WRAG; Gjersøe 2015, 147). The assessors do not make the final decision. A government official, known as a decision-maker, reviews the claimant’s initial application and the results of the WCA to determine group placement (Gjersøe 2015).

As evidenced by the transition between contractors, the systemic failures originated in the policy’s design rather than its execution. Because both providers used the same evaluative checklist, it becomes clear that the assessment tool itself, rather than the implementing organization, served as the primary source of error (Baumberg et al. 2015; Citizens Advice Camden n.d.).

These findings have direct implications for the implementation of ADAP in Alberta. At present, there is significant opacity regarding the system’s procedural safeguards: there is limited public information concerning adjudicator credentials, qualifications or the specific criteria used to reach decisions.

This lack of transparency is compounded by the fact that ADAP’s eligibility process operates entirely through paper documentation, the Disability Assistance Medical Report (DAMR). Unlike other jurisdictions that may use in-person, video or telephone interviews, the Alberta model provides no such options for direct interaction between the applicant and adjudicators. This structural choice concentrates significant interpretive authority in two specific actors: the medical professional who authors the DAMR and the adjudicator who reviews it. By largely removing the applicant’s voice from the process, the system allows “expert judgment” to take priority over the individual’s own knowledge of their body and support needs (Stafford et al. 2019, 888; McAllister 2019, 340–41). This creates a significant risk of misclassification: when DAMRs are incomplete or lack insight into disability-specific employment dynamics, errors can occur with no straightforward means for correction.

EFFICIENCY: ASSESSMENT ACCURACY AND ADMINISTRATIVE COSTS

This risk of misclassification is not merely theoretical; evidence from the U.K.'s similar model reveals significant failings in assessment accuracy (Baumberg et al. 2015). Approximately half of claimants deemed fit for work appealed, and tribunals overturned more than 40 per cent of these appeals, with many errors involving claimants assessed as having no work limitations at all (Baumberg et al. 2015, 32). Between 2009 and 2013, this translated into between 40,000 and 110,000 appeals each quarter (Baumberg et al. 2015, 32). When the government introduced mandatory reconsideration as a procedural barrier to appeals, appeal rates declined, not because accuracy improved, but because access to administrative justice was reduced (Baumberg et al. 2015; Gjersøe 2015). The U.K. Administrative Justice Institute described mandatory reconsideration as “arguably one of the single most significant blows to the administrative justice system of recent times” (Mountbatten 2016, para. 1). Comparative experience indicates that lower appeal volumes should not be interpreted as evidence of system quality.

The administrative burden was also substantial: after the U.K. began reassessments under the WCA in 2010, a backlog of approximately 280,000 cases persisted as late as 2015 (National Audit Office 2016, 16). While Alberta's system is smaller and AISH serves fewer recipients, inaccurate or poorly implemented assessments under ADAP could still create substantial backlogs, particularly if a high volume of appeals occurs. These pressures would increase administrative costs and divert resources away from broader social services.

Under ADAP, the Medical Appeal Panel's independence is unclear and Medical Review Panel decisions denying AISH eligibility are final and not appealable, meaning that the safeguards Alberta most needs are absent precisely where the U.K. evidence shows they are most critical.

EQUITY: THE BINARY CLASSIFICATION PROBLEM

The U.K.'s experience also illuminates a structural equity problem that extends beyond operational performance: work capability assessments adopt a medical model framework, locating disability within the individual as something to be measured and classified, which the social model of disability critiques as a source of the problem itself. Evidence consistently shows that labour force participation reflects a complex interplay of health status, systemic barriers, discrimination and access to supports, factors that a “can work” versus “cannot work” classification overlooks (Cronin et al. 2013; Irvine and Haggar 2023). As Carmichael and Clarke (2020, 768) argue, this binary framework ignores structural constraints and does not adequately capture the full range of ways individuals contribute to society, including caregiving, volunteering and community participation.

Individual adjudicators may assess individual circumstances carefully; the equity problem is structural. The program's two-category output forecloses recognition of the range of working arrangements that characterize disability employment in practice. For those classified as “unable to work,” this categorization can be paternalistic, overlooking unpaid and socially valuable contributions such as household labour, community participation and advocacy (Carmichael and Clarke 2020). It also shifts responsibility away from governments to create inclusive labour market conditions for people with disabilities who want to work.

The classifications produce tangible financial consequences. Individuals assessed as having “some ability to work” under ADAP face a \$200 monthly reduction in income support, despite non-participation in the labour force often being driven by factors beyond their control. ADAP's uniform criteria further fail to account for episodic disabilities, where individuals may work intermittently but not consistently. During periods of illness or functional limitation, individuals classified as having “some ability to work” would nonetheless experience the full impact of

reduced benefit levels, increasing financial insecurity. Work capability assessments also often apply the same expectations across age groups, ignoring life-course differences (Gjersøe 2015). As Stafford et al. (2019, 896) note, it is unrealistic to expect individuals born with disabilities to achieve the same employment outcomes as those who acquired disabilities later in life with established work experience. The World Health Organization's International Classification of Functioning, Disability and Health emphasizes this idea by recognizing that individuals have different capacities and needs across the life course (Stafford et al. 2019, 896).

EFFECTIVENESS: SYSTEMIC BARRIERS TO EMPLOYMENT, WHAT ADAP'S DESIGN IS MISSING

What ADAP's design most clearly reveals is a pattern that Canadian disability policy scholars have documented as persistent: the tendency to locate the problem of disability employment within the individual rather than within the structures of workplaces and public institutions. This orientation, as Prince (2009) argues, has historically exempted governments and employers from the structural changes research identifies as most consequential for employment outcomes.

A systematic review of 47 studies found that the three most common barriers to hiring were: beliefs that workers with disabilities are less productive, assumptions that they impose high costs and limited employer knowledge of disability (Nagtegaal et al. 2023, 329), despite research showing no difference in productivity between workers with and without disabilities (Kaletta, Binks and Robinson 2012, 63). These misperceptions shape hiring practices long before an applicant even reaches the workplace, contributing to the exclusion of fully qualified individuals who often need minimal or no accommodations (Baker et al. 2018; Bonaccio et al. 2019).

A major misconception is that accommodations are prohibitively expensive. The evidence shows the opposite. A Job Accommodation Network (2025) study of over 5,400 employers found that 61 per cent of accommodations cost nothing and an additional 33 per cent involved a one-time expense averaging \$300. Employers can implement accommodations starting from the hiring process, providing interview questions in advance, allowing written responses or offering employment trial periods (Deloitte Canada and Auticon 2022, 28). Workplaces can create sensory-friendly environments, such as using natural lighting instead of fluorescent overhead lights, providing quiet spaces or allowing noise-cancelling headphones (Autism Alliance of Canada 2022, 3-4). Assistive technologies, such as voice-to-text software and hands-free phones, can also support productivity (Accessible Employers 2021).

Inclusive practices yield measurable returns: inclusive organizations are eight times more likely to achieve better business outcomes (Schwartz et al. 2020) and workers in inclusive workplaces are four times more likely to stay (Diversity Council Australia 2017, 12). To be effective, accommodations need to be standardized and normalized, and employers require education and training to address gaps in knowledge about working with employees with disabilities (Deloitte Canada and Auticon 2022, 29; Baker et al. 2018).

By focusing exclusively on assessing, training and monitoring individual workers, ADAP places no obligation on employers to create accessible environments. This design reflects an adherence to the medical model of disability which frames employment success as a matter of individual "readiness" rather than societal responsibility. Consequently, the government avoids mandating inclusive workplace standards, effectively placing the entire burden of adaptation on the client. While employment supports may improve an individual's theoretical "employability," they fail to address the structural inaccessibility of the labour market itself. Without government-led intervention to require inclusive workplaces, meaningful employment activation remains an elusive goal.

EFFECTIVENESS/EQUITY: POLICY DESIGN FAILURES, BENEFIT LEVELS AND EARNINGS EXEMPTIONS

Beyond employer-side barriers, ADAP's own policy design creates financial disincentives to employment. This comes at a time when AISH recipients in community housing also face rent increases of approximately \$220 per month (Inclusion Alberta 2025b), and the end of inflation indexing means recipients' real incomes will continue to decline (Inclusion Alberta 2025a). Furthermore, the clawback of the Canada Disability Benefit neutralizes the impact of federal support. Together, these intersecting policy choices risk worsening poverty among Albertans with disabilities rather than providing meaningful income security.

The reduction in earnings exemptions from \$1,072 to \$350 and \$700 per month creates particularly problematic incentives. A "welfare wall" occurs when people lose a large share of their income as they earn more, sometimes leaving them with little or even none of each additional dollar (Petit et al. 2020, 4). In some cases, individuals become financially worse off by working more because the loss of benefits and the payment of taxes outweigh the additional income from work (Torjman 2017, 12; Petit et al. 2020). Under AISH, earnings above \$350 trigger a dollar-for-dollar clawback, a 100 per cent effective marginal tax rate (EMTR), meaning that most of each extra dollar earned is lost through taxes and reduced benefits rather than improving take-home income. Lowering the earnings exemption from \$1,072 to \$350 means the system begins reducing income assistance at much lower earnings, increasing EMTRs and the financial penalty for working additional hours. ADAP has a higher threshold and applies a more gradual reduction, but recipients lose eligibility entirely at \$45,240 in annual income. The ADAP Discussion Guide illustrates this transition using a case study that assumes full-time employment at \$28 per hour (Alberta 2025d, 19), a scenario that does not reflect the labour market realities of most people with disabilities, particularly those who rely on part-time, episodic or contract work. In these cases, the lower ADAP benefit is particularly consequential, as individuals who cannot increase hours or earnings are left relying on a reduced monthly income.

The retention of medical benefits until age 65 represents a positive step by reducing one aspect of the benefit cliff. However, it does not address other systemic cliffs embedded in the income support system. An increase in earnings, such as receiving a promotion or working additional hours, may still trigger the loss of housing supports, childcare subsidies or other supplementary assistance. This phenomenon is not unique to ADAP or AISH; it is a design flaw inherent in all income assistance programs. In these situations, individuals have "fallen off the benefits cliff," where increased work effort does not improve their situation and may even worsen it, making it difficult to leave the social safety net (Dillard and Mers 2023, 2). Altogether, benefit cliffs create a strong disincentive to increase work hours, as doing so may leave individuals worse off financially, medically and in terms of access to essential supports.

SECTION 8. ANALYTICAL AND LEGAL FRAMEWORK

SOCIAL MODEL OF DISABILITY

As introduced in Section 3 and applied throughout, the social model of disability directs this paper's analysis towards the structural conditions, employer practices, benefit design and legislative frameworks that constrain or enable employment, rather than towards individual work capacity. This orientation shapes both the critique of ADAP in Section 7 and the recommended alternative in Section 9.

FOUR POLICY CRITERIA

The four criteria — effectiveness, equity, efficiency and political and administrative feasibility — introduced and justified in Section 4, structure the comparative assessment of policy options in Table 2. The U.K. case study in Section 7 provides the primary evidence base for effectiveness and equity assessments.

LEGAL AND HUMAN RIGHTS FRAMEWORK

The policy reforms introduced through ADAP must be situated within Canada's international obligations as a signatory to the United Nations Convention on the Rights of Persons with Disabilities (CRPD). The Government of Canada, along with provinces and territories, must take “appropriate steps to safeguard and promote” an adequate standard of living for people with disabilities and their families (United Nations 2006, 18). This obligation includes providing a social safety net through income assistance, ensuring access to adequate food, clothing, housing and disability-related services. Article 28(2)(b) specifically requires ratifying states to ensure access to social protection and poverty-reduction programs for people with disabilities (United Nations 2006, 18). As a jurisdiction subject to the CRPD, Alberta has a responsibility to uphold these commitments. The introduction of ADAP essentially lowers the social safety net for people with disabilities in Alberta. While the province continues to provide support as required by the CRPD, this shift towards a lower benefit floor raises concerns about a regression in the adequacy of that support and its ability to safeguard a recipient's standard of living.

As noted earlier, Alberta does not have accessibility legislation. As seen with the *Accessible British Columbia Act* and the *Accessibility for Manitobans Act*, these laws establish a framework for proactive and systemic change by requiring planning and implementation across sectors, rather than relying on individual complaints (Alberta Civil Liberties Research Centre 2025). In Alberta, the absence of comparable legislation means there is no legal requirement to remove barriers in key areas such as education, transportation or health care. Provincial policy, rather than enforceable rights, primarily governs disability supports, leaving people with disabilities without a guaranteed legal safety net and increasing the risk of inconsistent or inadequate support. The absence of accessibility legislation is discussed in the policy context in Section 2 and has direct implications for the employer-side analysis in Section 7.

SECTION 9. POLICY OPTIONS

ADAP as proposed is the government's stated plan, not one alternative among policy equals. This section assesses three possible approaches — maintaining the status quo, proceeding with ADAP as currently designed and adopting a unified, capability-enhancing program — to clarify the trade-offs involved in each direction and provide a structured basis for the paper's recommendations.

OPTION 1: STATUS QUO (AISH ONLY)

One option available to the government is to maintain the status quo. Under this approach, the AISH program would remain unchanged, and the government would not reassess any of the approximately 79,000 current recipients (Alberta 2025a). Existing benefit levels would continue and the administrative burden would remain lower, as the program's current systems and processes are already established. However, the status quo does not address the government's stated goal of increasing employment activation. The government did not design AISH to support employment transitions and maintaining the current model would not expand opportunities or incentives for work. The size of the fiscal commitment — \$1.6 billion annually — and the persistent disability employment gap provide a legitimate rationale for reform, even if ADAP's specific design is problematic. Politically, this option is also unlikely, as ADAP represents one component of a broader set of policy changes the government has clearly signalled.

OPTION 2: ADAP AS PROPOSED (GOVERNMENT'S PLAN)

Alternatively, the government could proceed with ADAP as currently designed. This path introduces several positive reforms, including the provision of dedicated employment supports, a feature notably absent from the current AISH model. ADAP also replaces the dollar-for-dollar reduction with a graduated clawback system. The plan also ensures long-term stability by allowing recipients to retain medical benefits until age 65, a significant protection against the high costs of disability-related health care. Nonetheless, the evidence reviewed in this paper raises significant concerns about whether the current design is likely to achieve its stated objectives of employment activation and fiscal sustainability.

Implementing ADAP as proposed would formalize the two-stream structure, differentiated benefit amounts, separate appeal systems, reduced income exemptions and the other design features previously outlined. The two-tiered benefit structure risks pushing recipients deeper into poverty, particularly given the loss of inflation protection and reduced earnings exemptions. The stress of reassessments and lower benefits may worsen mental and physical health outcomes, driving higher demand on health and social services. Without addressing structural barriers to employment, clawbacks, benefit cliffs and inaccessible workplaces, the policy is unlikely to produce meaningful increases in employment. Significant concerns also remain regarding procedural fairness: the redesigned appeal system, especially the elimination of appeals for AISH decisions, provides little transparency or recourse, potentially leaving many individuals financially worse off with no effective means to challenge the placement decision.

OPTION 3: UNIFIED, CAPABILITY-ENHANCING PROGRAM (RECOMMENDED)

The third and recommended alternative is a unified, capability-enhancing disability income program. Rather than maintaining two streams, this approach would establish a single program in which all recipients receive the AISH base rate of \$1,940 per month. The program would include a higher earnings exemption of at least \$800 per month, with a gradual benefit reduction beyond that threshold rather than the current dollar-for-dollar clawback under AISH. This structure would promote employment by ensuring recipients are not financially worse off when they choose to work. Employment supports would be available to all recipients on an opt-in basis, rather than being tied to employability assessments and would be complemented by employer-facing supports to address demand-side barriers in hiring and retention.

The program would restore inflation indexing to guarantee that both benefit levels and earning exemptions keep pace with the cost of living and would reinstate an independent appeals board for all appeals to ensure procedural fairness and timely correction of incorrect eligibility decisions. It would also retain ADAP's approach to maintaining access to medical benefits, ensuring that individuals do not lose essential supports as their employment or earnings increase. To strengthen overall income security, the program would ensure that benefits, such as the Canada Disability Benefit, are not fully offset through provincial clawbacks, allowing recipients to realize net income gains.

This alternative would achieve higher equity by guaranteeing all Albertans with disabilities the same financial foundation, ensuring that no one falls deeper into poverty based solely on how the system categorizes their disability. It would also support more sustainable employment outcomes. Rather than relying on a medical review process that categorizes individuals as either "able to work" or "unable to work," a unified program would allow recipients to make work decisions based on their own health, capacity and circumstances (Arciprete and Ciani 2025, 299). By offering employment supports without reducing income for those deemed more employable, this approach reduces the financial pressure and stress that undermine sustained labour market participation, enabling individuals to pursue work at a pace and in conditions that align with their needs.

This approach, however, would require the province to absorb higher near-term program costs relative to the two-tiered model. The fiscal implications would depend on the proportion of current AISH recipients whom the government would otherwise classify into the lower ADAP stream. Politically, a unified program may face resistance from a government that has signalled its intent to differentiate supports based on assessed work capacity. Implementation would also require the province to develop robust opt-in employment support infrastructure, which entails upfront investment before long-term savings from reduced administrative complexity and improved employment outcomes materialize. Despite these challenges, the evidence reviewed in this paper suggests that the potential gains in equity, employment sustainability and administrative efficiency make this alternative the strongest option for achieving both income security and employment participation goals.

Table 2. Comparative Assessment of Policy Options

Criterion	Option 1: Status Quo	Option 2: ADAP as Proposed	Option 3: Unified Program
Effectiveness (poverty reduction)	Maintains current benefit levels; does not address employment activation	Reduced benefits risk deepening poverty; employment gains unlikely without employer-side reform	Higher base benefit with opt-in employment supports; strongest poverty reduction potential
Equity	Uniform benefit but no tailored employment supports	Two-tiered structure creates inequities based on assessed work capacity	Equal base benefit for all; eliminates classification-based inequity
Efficiency	Low administrative costs; established systems	New assessment and appeal infrastructure increases administrative costs and backlog risk	Reduced administrative complexity from single stream; upfront investment required
Political and administrative feasibility	Unlikely; contradicts government's stated reform direction	Aligns with government's fiscal goals but carries significant implementation risks	Requires political willingness to reverse two-tiered approach; stronger evidence base

SECTION 10. RECOMMENDATIONS

Building on the analysis above and the recommended unified, capability-enhancing program, the following recommendations support employment activation while strengthening financial security for Albertans with disabilities. These are organized across four areas: 1) program and income support redesign; 2) procedural fairness and governance; 3) employer-side and workplace reforms; and 4) long-term foundational reforms.

1. PROGRAM AND INCOME SUPPORT REDESIGN

Recommendation 1: Create a unified program with equal base benefits for all eligible individuals. All recipients should receive the full \$1,940 monthly base benefit to reduce financial shocks and promote stability. A unified program would be more inclusive, eliminating distinctions based on whether officials deem someone “able” or “not able” to work. This approach allows individuals who wish to pursue employment to do so with appropriate supports, without program categories limiting or labelling them.

Recommendation 2: Raise the monthly earnings exemption to at least \$800 and use a graduated clawback. AISH recipients would strongly feel the proposed drop in the earnings exemption from \$1,072 to \$350 per month, while ADAP's \$700 exemption remains relatively low and may still discourage labour market participation. Raising the exemption to at least \$800 would better support individuals in entering or re-entering the workforce and gaining experience. For those earning above \$800, a gradual, sliding-scale reduction in benefits would help recipients build financial security before their assistance tapers off.

Recommendation 3: Reform spousal and cohabitation rules to increase fairness and reduce penalties on households. As discussed in the ADAP Overview, both programs reduce benefits based on partner income, assuming partners can provide significant financial support even in households with children or complex needs. This can create undue strain, discourage relationships and contribute to financial instability. Revising these rules to better reflect shared responsibility, rather than assuming full dependency, would reduce inequities and improve financial security for recipients and their families.

2. PROCEDURAL FAIRNESS AND GOVERNANCE

Recommendation 4: Reinstate an independent, multidisciplinary appeals panel. Under the proposed changes, individuals whom the Medical Review Panel finds ineligible for AISH will not be able to appeal. While those whom the adjudicator does not recommend to AISH may appeal to a new ADAP Medical Appeal Panel, the structure appears closely tied to the program rather than fully independent. To ensure procedural fairness, all applicants should have access to an appeal process that is transparent, impartial and accessible. This paper recommends reinstating a fully independent, multidisciplinary appeals body, such as the Citizen's Appeal Panel, to hear all appeal types, including both medical and non-medical decisions.

Recommendation 5: Streamline income reporting and adjustment systems to reduce administrative burden and prevent overpayment shocks. Currently, reporting income can be complex: recipients may need to provide pay stubs, employment records or other financial documentation regularly. Even small errors or delays in reporting can result in overpayments, which the government often recovers retroactively, creating sudden financial shocks for already vulnerable individuals. Linking income verification to existing payroll or tax systems, simplifying reporting requirements and reducing retroactive recoveries would reduce the administrative burden while preventing unexpected financial losses.

3. EMPLOYER-SIDE AND WORKPLACE REFORMS

Recommendation 6: Fund standardized employment accommodations through grants or tax credits. While many workplace accommodations are relatively inexpensive, financial support through grants or tax credits could increase their availability and normalize their provision. Given that 61 per cent of accommodations cost nothing and most others average \$300, targeted public investment could substantially reduce barriers for employers, expand inclusive employment opportunities and support the development of standardized accommodation practices across sectors.

Recommendation 7: Explore mechanisms to incentivize inclusive hiring, such as linking workplace accessibility assessments to procurement decisions. While no established model for procurement-linked accessibility incentives currently exists, the principle of using government purchasing power to advance accessibility goals merits further development and could complement other employer-side reforms.

4. LONG-TERM FOUNDATIONAL REFORMS

Recommendation 8: Introduce provincial accessibility legislation modelled after the *Accessible British Columbia Act*. As outlined in the legal framework above, Alberta currently lacks provincial accessibility legislation. Enacting such legislation would embed accessibility into law rather than relying solely on policy. It would require the provincial government and regulated organizations to establish accessibility committees, develop accessibility plans and implement feedback mechanisms, creating clear accountability for identifying and removing barriers (BC Accessibility Hub n.d.). This would signal the province's commitment to inclusivity and support progress towards a more barrier-free Alberta.

Recommendation 9: Align benefits to a disability-adjusted Market Basket Measure (MBM). As previously noted, Canada bases its official poverty thresholds on the MBM, which does not account for the additional, unavoidable costs associated with disability (Scott et al. 2022). As a result, the government currently calibrates disability income assistance to a standard of living designed for people without disabilities, leaving benefit levels approximately 30 per cent or more

below what individuals with disabilities require to meet basic needs. Adjusting the MBM to incorporate disability-related costs, such as assistive devices, transportation, health supports and other accessibility expenses, and aligning benefit levels accordingly would provide a more accurate measure of adequacy and help reduce poverty among people with disabilities.

SECTION 11. CONCLUSION

The government's objectives — fiscal sustainability and increased employment participation — are legitimate and reflect priorities shared by disability communities.

If implemented as proposed on July 2, 2026, the evidence reviewed in this paper raises significant concerns about whether ADAP's current design will achieve its stated goals. Drawing on Canadian disability data, international comparative analysis and the structural design of ADAP itself, the evidence suggests that the program's two-tiered benefit structure, reduced earnings exemptions, constrained appeal rights and reliance on work capability assessments create conditions more likely to deepen poverty and administrative complexity than to produce sustained employment gains. Beyond individual hardship, these outcomes would generate downstream pressures on health care, housing and community support systems, undermining the broader objectives of social and fiscal sustainability.

A viable path forward exists. The unified, capability-enhancing program recommended in this paper would address the government's legitimate objectives — supporting employment and managing fiscal pressures — through design features that evidence shows are more likely to succeed: adequate base benefits that provide stability, voluntary employment supports that reduce coercion-related harms, higher earnings exemptions that incentivize rather than penalize work and independent appeals that ensure procedural fairness. If Alberta aims to increase participation while managing public expenditures, a unified disability income program that prioritizes income adequacy, voluntary employment pathways and meaningful supports represents the most effective path.

Concrete first steps would include pausing the July 2026 ADAP rollout to allow time for evidence-based redesign; establishing an advisory committee that includes people with disabilities, disability organizations, medical professionals, employers and policy researchers; piloting opt-in employment supports within the existing AISH framework before full implementation; and commissioning an independent fiscal analysis comparing the costs and benefits of the two-tiered model against a unified approach over a 5- to 10-year horizon. Many of these steps align with Alberta municipalities, such as Edmonton, Calgary, Lethbridge, Red Deer, Claresholm and Camrose, which have filed official Notices of Motion urging the province to pause implementation (Calgary 2026; Edmonton Down Syndrome Society 2026; Gustafson 2026).

The evidence points to a more effective path. The government can proceed with a model that replicates the documented shortcomings of similar systems elsewhere, or it can pursue evidence-based reform that centres income security, procedural fairness and effective employment supports. The evidence reviewed in this paper indicates that the recommended approach is more likely than the current proposal to achieve the government's stated fiscal objectives while producing equitable outcomes for Albertans with disabilities.

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