

October 14, 2008

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Special Diets Expert Review Committee Co-Chair
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Special Diets Expert Review Committee Co-Chair
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Dear Co-chairs of the Special Diets Expert Review Committee

Thank you for the thoughtful analysis and advice provided in your report of April 2008 on the Special Diets Schedule. The clarity of focus on best practices in special diets for medical conditions and research analysis of the costs these dietary prescriptions add to a regular diet were particularly noteworthy. The current Special Diet Schedule will be greatly improved when your recommendations are implemented.

OPHA represents over 3,000 public health practitioners through individual memberships and 10 constituent societies. We actively promote child health and well-being, as well as access to affordable, nutritious and personally acceptable foods for all Ontarians. The Association's mission is to provide leadership on issues affecting the public's health.

We understand, as you noted in the beginning of the Report, that it is "not within the Committee's mandate to address issues regarding the Special Diet Allowance policy, individual cases, and/or social assistance in general". We agree, as per the consensus of your committee members, that it is imperative to emphasize in any preamble to these recommendations, that the delivery of this Report does not confirm the adequacy of the current rates of social assistance in regard to proper nutrition and health. As well, we commend the committee in its recommendation that the cost of special diets should be adjusted for the cost of inflation on an annual basis. The cost of living allowances provided within social assistance rates in this province have NOT been sufficiently adjusted for the cost of inflation in the past years and this has further eroded the buying power of individuals and households dependent on social assistance to cover the cost of rent and food, as well as other expenses. We agree that persons living in Northern and remote communities face additional dietary challenges, due to the higher costs and limited availability of foods compared to food costs and availability in the rest of Ontario.

We do have one important concern. Your committee clearly stated that “this financial benefit is to be used by social assistance recipients to support the costs associated with specific dietary interventions deemed necessary to effectively manage diagnosed medical conditions and/or diseases”. However, under the “general assumptions” made in the report, the assumption is made: “that the amount provided to Ontario Works and Ontario Disability Support Program recipients for basic needs was sufficient to purchase the minimum Food Guide Servings outlined in Canada’s Food Guide”. We would like to see this assumption explained in greater detail, acknowledging that it is not likely a valid assumption, given the number of deficit income to expense scenarios calculated across the province at health units each year as part of the Nutritious Food Basket costing. Such a statement would in no way undermine the fine work your committee has done to calculate the additional costs for special diets, which is indeed the purpose of your report. However, for effective implementation and support for individuals receiving social assistance, the assumption of sufficiency must be highlighted as a challenging issue that can undermine the effectiveness of the SDA.

In November, 2007, OPHA approved Resolution #5, ”Access to a Nutritious Diet for All”. Many income and expense scenarios published across the province, using only the basic cost of the Nutritious Food Basket and average rents, confirm that many people living on Ontario Works, Ontario Disability Support Program and minimum wage are not able to pay for food after they pay for rent and other necessities of living. This gap is of grave concern for the health of our population, wherein 8.4% are food-insecure.

The Special Diet Schedule is an essential component of social policy in our province. We hope that our suggestions can help your committee’s hard work to result in healthier diets for some of the most vulnerable people in our province. Please share this letter with the rest of the Expert Review Committee. Please contact the Chair of the OPHA Food Security Workgroup to discuss this further: Tracy Woloshyn, 905-895-4512 ext. 4352 or tracy.woloshyn@york.ca.

Sincerely,

Carol Timmings
President, OPHA

cc. The Honourable Madeleine Meilleur, Minister of Community and Social Services,
7th Floor, Hepburn Block, 80 Grosvenor Street, Toronto, Ontario, M7A 1E9

ADDENDUM

Concerns regarding Special Diet Allowance for Northern and remote communities in Ontario

From Public Health Nutritionists currently working in Northern Ontario, forwarded through OPHA

1. It appears the cost for Northern Ontario was based on costs from North Bay. The actual costs, as measured by the Nutritious Food Basket, are higher in the northern districts of Porcupine, Thunder Bay and the Northwest.
2. The assumption that fluid milk is not readily available and that skim milk powder is an appropriate substitute choice for Northern Ontario is not correct. The committee's use of powdered skim milk for costing skews the estimated costs for milk consumption downward. Since fluid milk is indeed available in the North, but at a much higher price than powdered milk or fluid milk elsewhere in the province, we recommend that the Special Diet Allowance be re-calculated for medical conditions that include milk consumption.
3. Calculations for the cost of a gluten-free diet for people with celiac disease are indeed problematic, due to the limited availability of gluten-free products in the North. The assumption that people in the North will use online specialty stores assumes that they have access to a computer and the internet, as well as the financial means to order product in sufficient quantities to make the \$10.95 shipping fee affordable.