

Date: July 8, 2025

Via Facsimile: 613-941-6900

With the launch of the Canada Disability Benefit, the federal government has taken a long overdue step toward addressing financial challenges faced by Canadians living with disability. However, The Canadian Association of Retired Persons (CARP) is deeply concerned by a major gap in the program: seniors aged 65 and older have been entirely excluded from eligibility.

The Canada Disability Benefit is not a universal income support but is a targeted benefit designed to offset the extra cost of living with disability such as mobility aids, caregiving and medical expenses. However, these costs do not disappear at 65 - if anything, they increase. Seniors have the highest disability rates of any age group: 33% of Canadians aged 65- 74 and 56.3% of those aged 75 and older live with a disability¹. And yet, seniors with disabilities are left out entirely of the new federal benefit.

As it stands, there is no equivalent federal disability benefit for seniors. While there are programs like Old Age Security (OAS) and the Guaranteed Income Supplement (GIS) that provide age-based income support, they do not address the specific and ongoing financial burdens of disability. A senior with disability faces both age-related and disability-related expenses, yet receives no additional federal disability benefit.

Likewise, the Canada Pension Plan (CPP) Disability benefit which provides monthly payments to those under 65 and who are unable to work regularly due to long-term disability ends at age 65. This is then converted to regular CPP. There is no “bonus” for someone aging into disability, it is actually a net loss and support unless they are extremely low-income and eligible for GIS.

This exclusion is unjustifiable.

- **Disability doesn't end at 65 - it increases.** The policy logic of excluding seniors wrongly assumes that aging replaces disability rather than compounding it. In reality, disability becomes more prevalent and more severe with age. According to Statistics Canada (2022), 40% of seniors aged 65 and older live with one or more disabilities, compared to 24% of adults aged 25 to 64 and 20% of youths aged 15 to 24². Among those aged 75

¹ https://publications.gc.ca/collections/collection_2011/rhdcc-hrsdc/HS64-11-1-2010-eng.pdf

² <https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2024001-eng.htm>

and older, the prevalence of multiple compounding disabilities is especially pronounced; they are twice as likely as youth to experience four or more types of disabilities, often with greater severity³. Any policy that excludes seniors ignores this reality and fails to provide support where the need is greatest.

- **The Canada Disability Benefit is income-tested.** The government has set income thresholds for eligibility. If a senior's OAS income puts them above the threshold, they would be ineligible in that instance. Including seniors aged 65 and up would not result in "double-dipping" - just fairness and necessary funds for those who need it most.
- **There is no duplication.** OAS and GIS are not disability-specific supports. Low-income seniors with disabilities are still incurring unique disability-related costs without any dedicated federal assistance. The \$200/month from the Canada Disability Benefit could be a lifeline for a senior on fixed income and facing disability-related costs.

To deny this benefit based solely on age is discriminatory and undermines the government's stated commitment to equity and inclusion.

CARP is calling on the federal government to:

1. Expand eligibility for the Canada Disability Benefit to include seniors aged 65 and older with disabilities.
2. Ensure any future enhancements to the Canada Disability Benefit do not reinforce this age-based exclusion.
3. Engage with stakeholders representing older adults with disabilities to address this policy gap.

Seniors living with disabilities should not be forced to rely on a patchwork of insufficient tax credits, limited grant programs and general income supports that fail to account for the true cost of living with disability. Policy consistency matters. We would never deny the Child Disability Benefit to a low-income family just because they also receive the Canada Child Benefit - why are we treating seniors differently?

This is not about asking for a handout or duplicative payments. This is about acknowledging the real, ongoing and compounding cost faced by older Canadians living with disabilities and correcting a clear policy oversight.

³ <https://www150.statcan.gc.ca/n1/pub/89-654-x/89-654-x2024001-eng.htm>

CARP urges the federal government to act swiftly to ensure all Canadians with disabilities regardless of age receive the support they need and deserve.

CARP continues to benefit from the contributions of dedicated volunteers who spearhead advocacy priorities through our local Chapters. CARP commends our Nova Scotia chapter and their Financial Security Advocacy Committee, who have brought vital attention to the need for disability support for older adults.

Sincerely,



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