

**RE: Formal Submission Addendum — AISH/ADAP Transition — The Government's Case Against**

REDACTED — file # and case ID

From ALSS Minister <ALSS.Minister@gov.ab.ca>**Date** Tue 2026-04-28 10:07 AM**To** s [REDACTED — personal email]**Cc** Office of the Premier <Premier@gov.ab.ca>

Dear [REDACTED]:

Thank you for your emails to the Honourable Danielle Smith, Premier of Alberta, and me, regarding the Assured Income for the Severely Handicapped (AISH) program, the Canada Disability Benefit (CDB) and the new Alberta Disability Assistance Program (ADAP). As Minister of Assisted Living and Social Services, I welcome the opportunity to respond on behalf of the Premier.

I regret to hear of the challenges you are facing and appreciate your advocacy on behalf of Albertans with disabilities like yourself. I care deeply for Albertans and am committed to ensuring our province continues to have the best disability programs in Canada. First and foremost, I want to reassure you that as a statutory program, AISH remains fully funded and available to all eligible Albertans. The AISH core benefit rate remains the same at \$1,940 per month in 2026, an annual increase of two per cent over 2025 — the highest support rate of any province in Canada. AISH's core benefit rate is \$1,940 tax-free per month, in addition to personal and medical benefits worth over \$400 per month on average. We encourage all our provincial counterparts to step up and match Alberta's level of support.

The CDB will be treated as non-exempt income for AISH recipients, meaning Albertans on AISH will continue to receive the same overall monthly support that they do today.

When the CDB was introduced, the 2024 federal budget stated that the intention of the CDB is "to see the combined amount of federal and provincial or territorial income supports for persons with disabilities grow to the level of Old Age Security and the Guaranteed Income Supplement," which works out to be \$1,925 per month as of January 2026. Alberta exceeds this benchmark, and we are pleased that the federal government is finally starting to pay their fair share to help support Albertans with disabilities.

As noted in the rules for AISH eligibility, it has been a longstanding requirement for AISH recipients to "apply for all other income you may be eligible for," including federal programs such as the CDB. Alberta's government advocated that all AISH recipients be automatically eligible for the CDB; however, the federal government did not listen and instead decided that in order to apply for the CDB, you must first apply and be eligible for the Disability Tax Credit (DTC). We warned the federal government that this process would be unnecessarily complex and burdensome for both individuals with disabilities and the medical system, but they did not heed our warning.

The federal government has announced its intention to provide a one-time supplemental CDB payment of \$150 by March 2027 to offset the cost of the DTC medical assessment for all individuals approved for the CDB. In the interim, the AISH program will cover the full cost of the

DTC medical assessment for eligible clients to support their access to the CDB. Payment requests should be supported by an invoice or cost estimate from a medical professional. Upon approval, the AISH program will issue a supplemental benefit to the client, who will be responsible for paying the medical professional. AISH clients will be required to repay the full amount provided by the AISH program.

The deadline for updating the AISH program about eligibility for the CDB has now passed. This means that \$200 will be reduced from your monthly AISH benefits beginning in April if you have not notified the AISH program about your CDB approval or denial. AISH clients are asked to update the AISH office or Alberta Supports on the decision of their CDB application to avoid a reduction in benefits as soon as they receive a decision. AISH clients can provide their update to the AISH program by email, phone, fax, visiting an in-person Alberta Supports Centre, or filling out the web form at www.alberta.ca/aish.

Please see the [CDB and DTC fact sheet](#) for more information. If you have further questions or need help applying, I encourage you to contact your local AISH office or Alberta Supports for assistance. You can find your local AISH office at www.alberta.ca/Contact-AISH, your local Alberta Supports office at www.alberta.ca/Alberta-Supports or by calling 211.

Again, I want to reassure you that the AISH program will continue to be there for those who rely on it to meet their needs. Our government is committed to ensuring Albertans with disabilities have the supports and resources they need, which is why we are investing a record \$3.72 billion to support Albertans with disabilities, the highest level of investment in the province's history.

Regarding ADAP, the program is being thoughtfully designed, based on input from Albertans with disabilities, to address a gap in supports for individuals with disabilities who are able to work and want to enjoy the benefits that come with employment, such as earning a pay cheque, building relationships, developing skills and providing a sense of purpose, belonging and independence. ADAP is scheduled to officially launch in July 2026.

ADAP public engagement concluded in September 2025, and we thank the thousands of Albertans who shared feedback throughout the engagement to help shape ADAP. We undertook public engagement in addition to engagement with disability advocates and service providers, including through roundtables and meetings. As the department reviews the feedback provided by Albertans, we have made some key decisions informed by the engagement:

- Increasing the employment income exemption for single clients on ADAP to \$700 per month:
 - This means individuals on ADAP will be able to earn up to \$700 per month before it begins to affect financial benefits.
 - Albertans on ADAP will be able to earn more than \$45,000 in employment income while continuing to receive financial benefits. This will be the highest limit for employment income while receiving financial benefits of any comparable disability income assistance program in Canada.
 - Albertans on ADAP will continue to receive the health benefits they need, regardless of employment income.
 - Detailed calculations for ADAP employment income exemptions will be set out in a Ministerial Order later this spring.
- Current AISH clients who meet one or more of the below criteria will be automatically approved for AISH, unless they choose to transition to ADAP to benefit from ADAP's higher employment income exemptions:
 - individuals with a severe and profound developmental disability, and/or who are deemed eligible for or are receiving Persons with Developmental Disabilities services;

- individuals with palliative or terminal medical conditions;
 - individuals living in continuing care homes; and
 - individuals 60 years of age or older.
- Alberta's government will cover the cost of one medical assessment for current AISH clients who transition to ADAP in July 2026 and later choose to be assessed for AISH.
 - This support is not time-limited and will be available whenever clients choose to access it.

Once ADAP has launched, applications for disability income assistance will be assessed for general, financial and medical eligibility. Once general and financial eligibility is confirmed, disability assistance adjudicators will review the medical evidence presented in the Disability Assistance Medical Report to determine if the applicant meets the medical eligibility criteria for either the AISH program or ADAP.

The key factor that will determine whether a person with a severe disability is medically eligible for either AISH or ADAP is their ability to work. AISH and ADAP will consider the information provided by the applicant and their medical professional(s) to assess the severity of the individual's disability and understand how it affects their ability to work to ensure placement in the program that best meets their needs.

If an individual disagrees with an ADAP decision, they can appeal through the ADAP Medical Appeal Panel or the Citizen's Appeal Panel, depending on the type of decision. Decisions by the disability assistance adjudicator to not refer an application to the AISH Medical Review Panel for an AISH eligibility determination, and decisions to determine if an applicant is not eligible for ADAP, can be appealed to the new ADAP Medical Appeal Panel. The Citizen's Appeal Panel will continue to hear non-medical eligibility appeals. Decisions by the AISH Medical Review Panel to deny eligibility for the AISH program will be final and not subject to appeal.

In July 2026, all AISH clients will be transitioned to ADAP, with the exception of people listed above, who will be automatically approved for AISH. These clients will not be required to submit a new medical report. AISH clients who transition to ADAP in July will receive a monthly transition benefit that will keep their maximum financial benefit amount the same as the AISH rate until December 31, 2027. During this time, clients can choose to remain on ADAP to take advantage of employment supports and higher employment income exemptions or apply for AISH. As of January 1, 2028, these clients will be considered transitioned, and the transition benefit will end.

Through active and supported case management, ADAP clients will have access to a range of supports to assist them to prepare for employment, find a job and work to their full potential. Employment services will include holistic wraparound supports designed to address a wide range of personal, social and practical barriers that may impact an individual's ability to find and maintain employment. ADAP clients are expected to participate in activities that help them move toward employment with supports that include digital services, career planning, assistive technology and supported job placements. ADAP clients will work with case managers to create a personalized action plan. ADAP clients in rural or remote areas will have access to digital and in-person supports.

If an ADAP client is unable to find a job after receiving employment services, they will continue to receive financial and health benefits. If their medical condition progresses to the point that they are unable to work, they can apply for the AISH program.

More information on ADAP can be found at www.alberta.ca/alberta-disability-assistance-program.

Alberta's government is committed to ensuring the province continues to have the best disability programs in Canada. More information about ADAP will be shared in the coming months. If you have additional questions, please contact Alberta Supports at 1-877-644-9992.

Thank you again for writing.

Sincerely,

Honourable Jason Nixon
Minister of Assisted Living and Social Services
Minister responsible for Housing
MLA, Rimbey-Rocky Mountain House-Sundre

cc: Honourable Danielle Smith
Premier of Alberta

Office of the Minister of Assisted Living & Social Services
228 Legislature Building
Phone: 7806436210



Classification: Protected A

From: REDACTED — name and email

Sent: April 15, 2026 8:17 PM

To: Office of the Premier <Premier@gov.ab.ca>

Subject: Formal Submission Addendum — AISH/ADAP Transition — The Government's Case Against Itself —

REDACTED — name and file #

CAUTION: This email has been sent from an external source. Treat hyperlinks and attachments in this email with care.

Premier Smith,

I am writing to submit a formal addendum to the submission package previously filed with your offices regarding the AISH-to-ADAP transition.

The attached document — The Government's Case Against Itself: An Eleven-Claim Analysis of ADAP's Internal Contradictions — presents analysis of eleven public claims made in support of the transition, each examined against the Government of Alberta's own published legislation, open data, budget documents, administrative records, and ministerial correspondence.

The eleven claims examined are:

1. That ADAP is designed for Albertans who are able to work — contradicted by the AISH Act's own eligibility standard of "substantial limitation," by the AISH Policy Manual's pre-existing employment obligation, and by government open data showing 83.9% of recipients have zero employment income.

2. That ADAP makes employment financially worthwhile — contradicted by independent University of Calgary analysis showing the government's own Case Study 1 leaves recipients \$164/month worse off than today.
3. That the transition improves fiscal efficiency — contradicted by an 89% increase in program administration costs in year one, and a downstream shelter cost break-even at 1.9% of the caseload.
4. That the Medical Review Panel will conduct fair, rigorous determinations — contradicted by unpublished criteria 76 days before transition, an impossible review volume, and a structurally conflicted panel.
5. That eliminating appeal rights is a reasonable change — contradicted by the government's own five-year administrative data showing a 37% overturn rate across 3,218 panel hearings.
6. That these cuts are a fiscal necessity — contradicted by four consecutive surpluses, \$5.6 billion in Heritage Fund deposits in the same period, and a reversal cost of 10% of one year's Heritage Fund returns.
7. That the province made even-handed fiscal decisions — contradicted by a simultaneous \$1.2 billion per year income tax cut that reduced the revenue base cited to justify disability cuts.
8. That the transition saves money for taxpayers — contradicted by an 89% administration cost increase, a \$22 million restructuring overhead against \$49 million in savings, and unquantified downstream costs in shelter, healthcare, and child welfare systems.
9. That the transition is legally grounded — contradicted by the reversal of 79,290 formal disability findings without new evidence, without explanation, and without the independent appeal mechanism required under Baker v Canada [1999] 2 SCR 817.
10. That the DTC/CDB process is accessible — contradicted by a 24% federal DTC completion rate, an undisclosed prerequisite chain, and a 28.3% cognitive disorder rate in the affected population.
11. That Minister Nixon's April 3, 2026 letter describes a reassessment pathway — when it describes a regression requirement, telling people already found unable to work that they must deteriorate further before reapplying.

The attached document includes a full source index covering 41 primary and publicly verifiable sources across ten categories.

This submission formally requests, before July 1, 2026:

- Immediate publication of full ADAP medical assessment criteria in plain language.
- Individual reassessment of all current AISH recipients prior to automatic transition.
- Restoration of the independent Citizens Appeal Panel removed by Bill 12.
- Immediate cessation of the Canada Disability Benefit dollar-for-dollar clawback.
- An independent downstream cost analysis before implementation.
- A published, binding review timeline with income protection at current AISH rates during the review period.
- An independent Auditor General value-for-money audit of the ADAP transition.

These requests have been included in all prior submissions. They remain unanswered. The transition is 76 days away.

REDACTED — signature block