



# HOUSING RESEARCH REPORT

## **Income Support in Relation to Housing in Canada and Selected Other Countries: International Jurisdictions**

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# Income Support in Relation to Housing in Canada and Selected Other Countries: International Jurisdictions

Social Research and Demonstration Corporation

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Submitted to the Canada Mortgage and Housing Corporation



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## Executive summary

The project on Income Support in Relation to Housing in Canada and Selected Other Countries is part of a broader exercise conducted by the Canada Mortgage and Housing Corporation (CMHC) to inform its ongoing work in the development of a National Housing Strategy (NHS) for Canada. Specifically, this project seeks to better understand the characteristics of income support programs such as social assistance and housing/shelter benefits and how they are delivered in Canada and selected countries.

This report reviews social assistance programs and housing benefits in the six international jurisdictions: Australia, Finland, Ireland, the Netherlands, the United Kingdom, and the United States (New York State). Specific benefit amounts are provided for four household types: a single adult with no dependent children, a couple with no dependent children, a single adult with two dependent children, and a couple with two dependent children. Social assistance benefits were compared with three benchmark measures – the income received by a full-time employee working at a minimum-wage salary, a Low Income Measure (LIM), and the average cost of rent in both the most expensive and least expensive area of each country – in order to assess benefit fairness and adequacy.

### Social assistance benefits

Social assistance benefit programs across the selected jurisdictions vary greatly in their purpose, composition and eligibility requirements. However, all selected jurisdictions also have internal variations, either in rate amounts, eligibility criteria, or provision of regionally specific benefits. While social assistance policy is often set at the national level, other levels of government (e.g., state, municipal) often have some purview over the delivery of programs.

Social assistance recipients are often also eligible for a wide variety of additional benefits within selected jurisdictions. These additional benefits often include benefits to families (e.g., child benefits), health care benefits, and benefits to cover emergency situations or unexpected expenses, including the cost of utilities.

Comparison of social assistance rates across jurisdictions – converted to Canadian dollars – revealed these to be highest in Ireland and the United Kingdom, and lowest in New York State.

### Shelter, housing, or rental benefits

Determination of shelter benefits is often tied to the size of household, including both the number of adults and the number of dependent children.

Housing benefits exceeded basic benefits in three of the six selected international jurisdictions: Finland, the United Kingdom, and New York State. Comparisons of housing benefits to average market rents found that Finland, Ireland and the United Kingdom provided housing benefits that exceeded average market rent in the least expensive areas of each country. Only in the United Kingdom did the housing benefit approach average market rent in the most expensive areas of the country.

## Relationship between social assistance benefits and housing benefits

Most international jurisdictions separate basic needs and shelter allowances into two separate rate schedules within their social assistance program. The Netherlands was the only jurisdiction to use a formula-based method to determine an individual's level of housing benefit, replacing its standard rate tables in 2008.

## Impact of housing type on social assistance and housing benefits

None of the selected jurisdictions provided separate rate schedules for social housing residents and private market rental residents.

## Comparison between benefits and adequacy benchmarks

This report presents three sets of rate comparisons:

1. Total social assistance benefits to minimum wage income
2. Total social assistance benefits to Low Income Measure (LIM)
3. Housing benefits to average market rents.

Total benefits approached or exceeded minimum wage in Ireland, the Netherlands, and the United Kingdom. Benefits approached or exceeded the LIM in Finland, Ireland, the Netherlands, and the United Kingdom.

Finland, Ireland and the United Kingdom also provided housing benefits that exceeded average market rent in the least expensive areas of each country, while the United Kingdom and Finland provided rates that approached or met average market rent in the most expensive area of those jurisdictions.

The implications of these diverse social assistance policies will be analyzed further in the upcoming synthesis report, including comparison with Canada.

## Résumé

L'étude sur le soutien du revenu par rapport au logement au Canada et dans certains autres pays fait partie d'une initiative de plus large portée menée par la Société canadienne d'hypothèques et de logement (SCHL) afin d'étayer ses travaux d'élaboration de la Stratégie nationale sur le logement (SNL) pour le Canada. Plus précisément, cette étude vise à mieux comprendre les caractéristiques des programmes de soutien du revenu, comme l'aide sociale ou les allocations et prestations de logement, ainsi que la façon dont ces programmes sont offerts au Canada et ailleurs dans le monde.

Ce rapport fait état des programmes d'aide sociale et des prestations relatives au logement en vigueur en Australie, en Finlande, en Irlande, aux Pays-Bas, au Royaume-Uni et dans l'État de New York aux États-Unis. Des prestations de montants spécifiques sont prévues pour quatre types de ménages : les adultes célibataires sans enfant à charge; les couples sans enfant à charge; les adultes célibataires ayant deux enfants à charge; et les couples ayant deux enfants à charge. Les prestations d'aide sociale ont été comparées à trois repères – le revenu gagné par un employé à temps plein travaillant au salaire minimum, une mesure de faible revenu (MFR), et le loyer moyen dans la région de chaque pays où les loyers sont les plus élevés et dans celle où ils sont les plus bas – afin d'évaluer l'équité et la suffisance des prestations.

## Prestations d'aide sociale

Les programmes d'aide sociale dans les administrations étudiées varient grandement en ce qui touche leur objet, leur composition et les critères d'admissibilité. Cela dit, il faut ajouter que, dans toutes ces administrations, les programmes comportent aussi des variations à l'interne, qu'il s'agisse des montants accordés, des critères d'admissibilité ou des prestations offertes en fonction de régions données. Bien que la politique d'aide sociale soit souvent établie à l'échelle nationale, d'autres ordres de gouvernement (par exemple les États et les municipalités) ont souvent leur mot à dire dans l'exécution des programmes.

Les bénéficiaires de l'aide sociale ont souvent droit à un large éventail de prestations supplémentaires dans certaines administrations. Cela comprendra fréquemment des prestations destinées aux familles (par exemple les prestations pour enfants), des prestations de soins de santé et des prestations accordées lors de situations d'urgence ou pour couvrir des dépenses imprévues, y compris le coût des services publics.

La comparaison des taux de l'aide sociale des différentes administrations étudiées – exprimés en dollars canadiens – a révélé que les taux les plus élevés étaient observables en Irlande et au Royaume-Uni, et que c'était dans l'État de New York qu'ils étaient les plus bas.

## Allocations de logement, prestations de logement ou subventions au loyer

La détermination des allocations de logement est souvent liée à la taille du ménage, soit le nombre d'adultes et le nombre d'enfants à charge.

Les prestations de logement excédaient les prestations de base dans trois des six administrations étudiées, plus précisément en Finlande, au Royaume-Uni et dans l'État de New York. La



comparaison des prestations de logement avec les loyers moyens du marché montre que la Finlande, l'Irlande et le Royaume-Uni offraient des prestations de logement supérieures au loyer moyen du marché dans leurs régions respectives où les loyers étaient les moins élevés. Il n'y a qu'au Royaume-Uni que les prestations de logement étaient presque égales au loyer moyen du marché dans les régions où les loyers étaient les plus élevés.

## Lien entre les prestations d'aide sociale et les prestations de logement

La plupart des administrations étrangères prévoient deux barèmes distincts pour les prestations au titre des besoins de base et les allocations de logement dans le cadre de leur programme d'aide sociale. Les Pays-Bas étaient la seule administration à utiliser une méthode fondée sur une formule pour déterminer le montant des prestations de logement des personnes, cette méthode ayant remplacé ses tableaux de taux standard en 2008.

## Incidence du type de logement sur l'aide sociale et sur les prestations de logement

Aucune des administrations étudiées n'a fourni de barème de taux distinct pour les résidents de logements sociaux et les résidents de logements locatifs du marché privé.

## Examen des prestations comparativement à certains repères de la suffisance des prestations

Le rapport présente trois séries de comparaisons de taux :

1. Total des prestations d'aide sociale par rapport au salaire minimum
2. Total des prestations d'aide sociale par rapport à une mesure de faible revenu (MFR)
3. Prestations de logement par rapport aux loyers moyens du marché

Le total des prestations dépassait ou atteignait presque le salaire minimum en Irlande, aux Pays-Bas et au Royaume-Uni. Les prestations approchaient ou dépassaient la MFR en Finlande, en Irlande, aux Pays-Bas et au Royaume-Uni.

La Finlande, l'Irlande et le Royaume-Uni accordaient également des prestations de logement qui excédaient le loyer moyen du marché dans leurs régions où les loyers étaient les moins élevés; en outre, le Royaume-Uni et la Finlande appliquaient des taux qui atteignaient ou atteignaient presque le loyer moyen du marché dans leur région affichant les loyers les plus élevés.

Les répercussions de ces diverses politiques d'aide sociale seront analysées plus en détail dans le prochain rapport de synthèse, qui comportera en outre une comparaison avec le Canada.



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# 1. Introduction

The Government of Canada has committed to developing a long-term national plan for housing, a National Housing Strategy (NHS). The Income Support in Relation to Housing in Canada and Selected Other Countries project is part of a broader exercise conducted by the Canada Mortgage and Housing Corporation (CMHC) to support the Government by providing timely, evidence-based research, information and policy advice. CMHC will look at a range of thematic areas, including conducting international benchmark research on housing policies and programs in comparable jurisdictions to identify global best practices and lessons learned that may inform the Canadian experience.

Specifically, the CMHC Housing Needs Policy and Research division is seeking to better understand the characteristics of income support programs such as social assistance and housing/shelter benefits and how they are delivered in Canada and selected countries. The Social Research and Demonstration Corporation (SRDC) has been engaged to assist with this process.

Guiding research questions for the project include:

1. What are the basic social assistance benefits in each jurisdiction (as defined by the OECD)?
2. How do the basic social assistance benefits relate to housing benefits?
3. Are basic social assistance benefits being set in a complementary way to housing benefits or are they part of different policies/programs?
4. Do social assistance levels and/or housing benefits differ depending on where you live (e.g., in social housing or private market)?
5. How do social assistance and housing benefits compare to adequacy benchmarks for people with low incomes?
  - a. How do social assistance benefits compare to minimum wage income and Market Basket Measure?
  - b. How do housing benefits compare to average market rents?

The OECD defines social assistance as *'cash or in-kind transfers that aim at preventing extreme hardship and employ a low-income criterion as the central entitlement condition'*.<sup>1</sup> Terminology to describe social assistance varies by country, and include terms like 'minimum-income benefits', 'minimum safety-net benefits', 'benefits of last resort' or 'welfare benefits'. 'Social assistance' is generally available to those with low income, whereas, minimum income benefits include social assistance, as well as other more targeted programmes such as means-tested lone-parent benefits.

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<sup>1</sup> Immervoll, H. (2010). "Minimum-Income Benefits in OECD Countries: Policy Design, Effectiveness and Challenges." *OECD Social, Employment and Migration Working Papers*, No. 100, OECD Publishing, p. 7.

Targeting low-income groups is a central design feature of cash transfer programs in several OECD countries including Canada, UK, Ireland, and most notably Australia.

**Housing benefits** typically refer to means-tested cash transfers for which low-income households may qualify; they may be administered as a separate program or payable as part of social assistance entitlements. In Canada – as in most OECD countries – housing benefit programmes are typically not accompanied by work-related requirements or interventions that seek to re-establish self-sufficiency.<sup>2</sup>

This report presents the relationship between income support programs and housing benefit programs as it exists in select OECD countries. The report is divided into five sections:

1. The **Introduction** to the report.
2. The **Methodology and Approach** section specifies how data was collected, the types of documents consulted, and the selection of jurisdictions, benchmarks and household types.
3. The **International Portraits** section provides information from all jurisdictions detailing their social assistance and housing benefits programs. Sub-sections address the policy context within the jurisdiction, the structure of social assistance in the jurisdiction, housing benefits as they relate to social assistance programs, and other benefits provided to low income persons. The information regarding the policy context is narrowly focused on social assistance benefits and cash transfers, and does not address the wider policy environment in each jurisdiction. The information provided was retrieved from policies, regulations, legislation and program reviews.
4. The **Rate Comparisons** section compares social assistance and housing benefits to key benchmarks, including minimum wage income, low income measure (LIM), and average market rents in each jurisdiction.
5. The **Overview of Key Features** section provides a summary of the information collected for each component analysed in the previous section and highlights several important distinctions and similarities across Canadian jurisdictions.
6. The **Implications and Next Steps** section puts the results of the international scan into the context of the research questions and sets out how the subsequent synthesis report will continue to contribute to those results.

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<sup>2</sup> Immervoll, H. (2010). "Minimum-Income Benefits in OECD Countries: Policy Design, Effectiveness."



## 2. Methodology and approach

### Selection of jurisdictions

The selection of six international jurisdictions was based on a number of criteria that would facilitate comparison with Canada, while also including innovative or promising practices. These criteria include:

- A federated political system;
- Membership in the Organisation for Economic Co-operation and Development (OECD);
- Similar social welfare model and policy objectives to those in place in Canada, particularly vis-à-vis the role of social assistance;
- Previous history of and experience with social assistance/social spending reform;
- The extent to which income support programs are financed from general tax revenues; and
- The extent to which public spending on cash benefits is subject to income/means testing.

On the basis of these criteria, the following jurisdictions have been included in this analysis: Australia, Finland, Ireland, Netherlands, United Kingdom, and New York State in the United States.

### Selection of household types

Since rates in many jurisdictions vary by size of household, we have selected four types of household as the basis for comparison of social assistance rates:

- A single adult able to work, between 25 and 65 years of age, with no children;
- A couple where both adults are able to work and are between 25 and 65 years of age, with no children;
- A single parent between 25 and 65 years of age, with two dependent children (one child between zero and six years of age and one child between 12 and 17 years of age); and
- A couple where both adults are between 25 and 65 years of age, with two dependent children (one child between zero and six years of age and one child between 12 and 17 years of age).

These household types were selected in order to reflect a variety of different household compositions and benefit structures. For instance, in a number of jurisdictions, special benefits are provided for single parents, while other jurisdictions provide different rate structures depending on the age of children in the household.

### Setting benchmarks

Regardless of jurisdiction, social assistance programs typically attempt to balance three competing goals: adequacy, fairness and incentives to work.

- **Adequacy:** The ability of individuals or families receiving benefits to meet their needs.
- **Fairness:** The difference between people who are receiving social assistance and those with low incomes who are working but not receiving assistance, with the assumption that it would be unfair for social assistance rates to exceed income from work.
- **Incentives to work:** Includes both eligibility requirements that encourage job seeking, as well as financial incentives to work, such as limiting the claw back of benefits when recipients gain employment.

In order to examine the relative level of social assistance benefits, particularly as they relate to adequacy and fairness goals, rates have been compared to:

- The income received by a full-time employee working at a minimum-wage salary;
- A Low Income Measure (LIM) for each jurisdiction; and
- The average cost of rent in each jurisdiction.

### Income benchmarks

A Low Income Measure (LIM) was calculated for each jurisdiction at 50 per cent of the country's median adjusted household income. Adjusted indicates that household size is taken into account, reflecting the fact that a household's needs increase as the number of members increases (Statistics Canada, 2015). The OECD originally proposed this measure in 1989 as a basis for making international comparisons, primarily due to simplicity in calculation allowing for easier application in different jurisdictional contexts.

Monthly minimum wage income was estimated for a full-time worker, working 40 hours per week in an average month (calculated at 4.35 weeks in a month).

### Housing benchmarks

Average market rents were located from a variety of sources depending on the jurisdiction, including both governmental and non-governmental sources. When available, the most expensive region of a jurisdiction was contrasted with the least expensive region, in order to illustrate a range of household experiences with affordability across that state or country. Similarly, a variety of apartment sizes were selected in order to reflect the relative need of different household sizes, when that information was available. Notes are provided to indicate the apartment size and location in all appropriate tables.

## Defining social assistance and housing benefits

Social assistance programs and benefits vary across jurisdictions, as outlined in this. In general however, social assistance programs offer separate rates for shelter from those used for basic needs (i.e., food, clothing, personal expenses). Other special benefits (e.g., utility benefits) are offered under certain circumstances in different jurisdictions. Exceptions to this are noted in the report.

All relevant benefits available in each jurisdiction<sup>3</sup> are presented in the report, but in order to effectively compare rates across jurisdictions, monetary comparisons were made only with basic rates and shelter allowances. In cases where basic rates or shelter allowances varied within a jurisdiction, the maximum benefit was selected.

## Conversion to Canadian dollars

In order to compare rate levels across jurisdictions, foreign currency was converted into Canadian dollars using the OECD's Purchasing Power Parity data for 2015.

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<sup>3</sup> This report focuses on general social assistance and housing benefits. Benefits for specific populations such as persons with disabilities and low-income earners were beyond the scope of this project.

## 3. International portraits

### Australia

#### Policy context

Australia's social assistance and income support programs are administered by the national government, the Commonwealth of Australia. The current system is extensive, offering roughly 20 income support payment types and 55 supplementary payments funded through general public revenue. By 2013, the Australian government had determined that the size of the welfare system had grown to unsustainable levels and sought policy reforms with the goals of making the system "fairer, more effective, coherent and sustainable" (Department of Social Services, 2016a).

In 2015, the government published the results of a series of public consultations led by an independent Reference Group. The report, *A New System for Better Employment and Social Outcomes*, outlines how the government intends to reform the system. The four main pillars of the country's current reform plan are:

1. Creating a simple and sustainable income support system;
2. Strengthening individual and family capability;
3. Engaging with employers; and
4. Building community capacity.

Australia's housing policy, on the other hand, is administered by state and territorial governments. These policies are guided by a broad housing policy agenda set by the Commonwealth government in consultation with state and territorial governments and previously articulated through the Commonwealth State Housing Agreements (CSHAs), which were replaced in 2009 by the National Affordable Housing Agreement (NAHA).

The introduction of NAHA was part of a broader effort by the Commonwealth government to reform financial payments to state and territorial governments. NAHA aims to ensure that "all Australians have access to affordable, safe, sustainable housing that contributes to social and economic participation" (Department of Social Services, 2016). According to Wilson et al. (2010), researchers with the University of South Australia, the NAHA is an important and positive step for social housing in Australia, as it addresses housing "holistically" as a "single policy concern," with an aim to improve social and economic inclusion by concentrating on issues such as homelessness, social housing, rental assistance, home purchase assistance and indigenous housing.

#### Overview of social assistance programs

The **Special Benefit** is the country's social benefit of last resort and is provided to individuals and households who face severe financial hardship, who have no other means of support, and for whom no other benefit is available. It is usually provided for a period of 13 weeks, and a review conducted at the end of this period to determine whether payment should continue.

Payment rates are determined on an individual basis and are based on the claimant's individual needs. Maximum rates are determined on a case-by-case basis but cannot exceed the amount a claimant would have received from employment assistance programs such as **Newstart Allowance (NSA)** and **Youth Allowance (YA)**. Allowances are indexed twice a year to the Consumer Price Index.

### *Eligibility criteria*

Claimants are eligible for the **Special Benefit** if:

- They are in *severe financial hardship* and unable to earn enough income to support themselves and their families, which is determined by the following criteria:
  - The household's total bi-weekly income is less than the maximum Special Benefit rate allowed (budget deficit);
  - Access to liquidity is less than the allowable limit; and
  - There is no other source of income available.
- They are unable to receive any other income support payment offered by the government; and
- They are residents of Australia, live in Australia when they receive their payments, and continue to live in Australia as long as they receive this payment.

### Regional variations in social assistance rates

Social assistance rates do not vary across the country; however, additional benefits are offered to residents in remote communities. These include:

- The **Community Development Programme (CDP)** was implemented on July 1, 2015, replacing the Remote Jobs and Community Programme. The CDP is intended to increase employment and break the cycle of welfare dependency in remote areas of Australia. The program provides job seekers with personalised assistance – which can include skills training – with the expectation that job seekers do up to 25 hours per week of work-like activities that benefit the community;
- The **Remote Area Allowance and the Isolated Children Scheme** is provided to families with school age children living in an isolated area, or with children living with a disability whose needs cannot be met at a local state school.

### Additional benefits provided through or outside social assistance programs

The Australian government provides a number of additional benefits and supports to eligible social assistance recipients, including the following:

- **Family Tax Benefits (FTB)** are non-taxable, income-tested benefits to assist families with the costs of raising children. FTB-A is the standard benefit provided for each child, while FTB-B gives extra help to single parents and families with one main income. Roughly 70 per cent of

families with children under 16 years of age receive FTB-A (1.9 million families) and about 60 per cent of families with children under 16 years of age receive FTB-B (1.6 million families).

- **Clean Energy Supplement** is an ongoing payment to help eligible households with any impact from the carbon price on everyday expenses.
- **Crisis Payment** provides immediate financial assistance that may be paid in cases of severe financial hardship and suffering from extreme circumstances (e.g., a victim of domestic violence) or release from lawful custody (prison or psychiatric confinement) where the custody has lasted 14 days or more.
- **Early Release of Superannuation** allows for the early release of pension funds on specific compassionate grounds or on grounds of severe financial hardship.
- **Income Support Bonus** is a tax-free payment made twice a year to help people receiving certain income support payments prepare for unexpected living costs.
- **Work Bonus** provides an incentive for pensioners who have reached an eligible pension age to remain in the workforce.
- The **Reconnect program** is a community-based early intervention service that provides assistance to young people between the ages of 12 and 18 years who are homeless or at risk of homelessness, and their families. Reconnect provides at-risk youth with services for the entire family, including counselling, group work, mediation, practical support, as well as specialised mental health services.

### Overview of shelter, housing or rental allowances within social assistance programs

The government of Australia provides financial assistance to social assistance recipients in order to help cover the cost of rent through the **Rent Assistance** program. Rent Assistance is a non-taxable income supplement available to individuals living in private or community housing rental markets. In order to qualify for Rent Assistance, claimants must also qualify for social security payments, a service pension or they must receive more than the base rate of the Family Tax Benefit (FTB) A.

Rent Assistance is paid at a rate of 75 cents for every dollar of rent payable above the rent threshold specified by the government for each household type, including the number of children living in the household and the family situation. Recipients are liable to pay the value of their rent below this threshold. Rent thresholds are indexed twice a year, in March and September, to reflect changes in the Consumer Price Index.

### Relationship between housing type and social assistance/housing benefits

Social assistance rates and housing benefits are not dependent on whether recipients live in social housing or the private market.

## Finland

### Policy context

Social security is a shared responsibility between the Finnish national government and its municipalities, where the former provides unemployment, housing and other benefits through the Finnish Social Insurance Institution, Kela. Municipalities, on the other hand, are responsible for administering the welfare program through means-tested social assistance payments.

Municipalities and the Finnish government share the costs of basic social assistance equally.

Finnish housing policy is the responsibility of the Ministry of the Environment, and includes responsibility for determining housing strategies, managing the housing subsidy system and budget planning (Tähtinen, 2003). Current housing policy in Finland aims to increase the production of affordable housing and improve housing conditions for individuals in need of support. Most government subsidised housing is owned and managed by municipalities and operated under legal provisions that ensure a non-profit model for social housing.

In 2015, the Finnish government announced its intention to test a minimum income model. In March 2016, the research working group presented its report to the Minister of Social Affairs and Health outlining a number of models that could be used to test universal basic income. The pilot study is expected to take place between 2017 and 2018, with an evaluation expected in 2019. Among the goals of the pilot is to find a way to simplify the current benefit system, to reduce the bureaucracy needed to run the current benefit scheme, and to ensure sustainability of the social assistance program.

### Overview of social assistance programs

Social assistance in Finland is provided to households in need of assistance to cover basic expenses such as for food, clothing, personal hygiene, minor health care expenses, local transportation, and information (e.g., newspaper, telephone, TV licence). Reasonable housing costs are also covered by an additional allowance. The basic amount of social assistance a household receives is calculated by subtracting the household's expenses from available funds and income.

### Regional variations in social assistance rates

Benefits provided nationally by the Finnish government are consistent across the country; however, benefit limits and eligibility criteria for locally managed social assistance programs are set by the municipality. As a result, the generosity of benefits can vary across municipalities.

### Additional benefits provided through or outside social assistance programs

Claimants may receive additional funds to cover the costs of necessary household expenditures such as home insurance, home electricity, and children's day care fees. Significant health care costs – such as for pharmaceuticals, fees of health centres, doctors or dentists, and eye glasses – may also be covered through these additional benefits.

## Overview of shelter, housing or rental allowances within social assistance programs

Housing allowances are paid to claimants through the Finnish Social Insurance Institution, Kela. These benefits are intended to cover allowable housing costs such as rent, up to the specified maximum limit for household type. Kela offers different housing allowances depending on the household type, such as the General Housing Allowance (for low-income households, varies by the number of members living in the household, the municipality, and monthly income), Housing Allowance for Pensioners (for low-income pensioners), and the Housing Supplement for Students (for students who are living in a rental unit while they are attending school).

The household is expected to pay at least 20 per cent of housing costs. As a result, the general housing allowance is 80 per cent of the difference between allowable housing costs and the basic deductible, determined on the basis of the household income and the number of adults and children.

## Relationship between housing type and social assistance/housing benefits

The government supports housing through interest subsidies and guarantees. Rents from government-subsidized dwellings are determined through the cost-correlation principle, which posits that increases in the cost of social housing should correlate with increases in private market rents.

## Ireland

### Policy context

The Republic of Ireland's social welfare system is administered by the Department of Social Protection. The Department's mission is to promote active participation in society in part through the provision of income and employment supports. Ireland's housing policy is managed by the Department of Housing, Planning, Community and Local Government.

Current housing policy is underpinned by the belief that access to affordable housing in a sustainable community should be available to every household. To deliver on its objectives, the national government is engaged in the supply of affordable housing, reduction of homelessness, and the provision of housing supports, which form the basis of the Construction 2020 and Social Housing Strategy 2020 policy guides.

### Overview of social assistance programs

Ireland's social welfare system is provided through three main types of payments:

1. Social insurance payments (also referred to as Pay Related Social Insurance, or PRSI);
2. Means-tested payments, which are provided to individuals who can demonstrate a need for assistance and have exhausted their social insurance payments; and
3. Universal payments, which are not dependent on income or a person's social insurance history.



Means-tested payments are payments of last resort and include the **Jobseeker's Allowance (JA)**, which provides assistance to individuals and households who are unemployed and do not qualify for unemployment insurance. Unlike the Jobseeker's Benefit – a PRSI payment which uses an insurance model based on individual contributions – the JA is funded through general revenues and is provided to families with limited means.

The **Jobseeker's Transitional Payment (JST)** is a special arrangement under the JA program aimed at supporting single parents with young children. Although income support levels are the same for both JA and JST, there are different conditions for receipt of JST, such as:

- Clients do not have to look for work, allowing them to spend more time caring for their children (however, childcare supports are available if a client does find work);
- Clients can study and still receive JST;
- Clients do not have to be fully unemployed four out of seven days to receive JST, so long as they satisfy the means test; and
- Clients cannot cohabit with another adult while receiving JST.

The **Supplementary Welfare Allowance (SWA)** is a weekly allowance paid to households with little or no income that have claimed a social assistance payment but which has not yet been paid. The SWA is provided while households await their payment from JSA. Payment rates are the same under this program as they are for JA.

### Regional variations in social assistance rates

Social assistance rates are consistent across Ireland. However, monthly housing allowance limits vary by community.

### Additional benefits provided through or outside social assistance programs

Working age social assistance clients have access to a number of employment programs to help them re-enter the labour force, such as assistance with job search, training, or education, through community employment programs, work experience programs, or employment subsidies.

The **Fuel Allowance** is made to a household in which clients are on long-term social welfare or are unable to pay for their own heating needs. The allowance amounts to €20 a week (CAD \$30) to help cover the cost of heating during the winter.

Pensioners and people with disabilities can access additional benefits, such as:

- The **Household Benefits Package**, which provides a monthly Electricity/Gas Allowance and a television licence;
- The **Free Travel** scheme which provides eligible clients free access to all State public transport and some private bus transport companies; and
- The **Living Alone Increase** which is an extra payment for people who are 66 years of age or over, live alone, and receive social welfare payments. It amounts to €9 a week (CAD \$14).

## Overview of shelter, housing or rental allowances within social assistance programs

Households in Ireland that live in private rented accommodation and cannot provide for the cost of shelter can qualify for the Rent Supplement. In order to qualify, the household's rent must fall below the rent limits set by the government, which vary by county. The amount of the payment is calculated to ensure that household income does not fall under a minimum level after covering shelter costs.

Claimants of the Rent Supplement must demonstrate that they were able to afford their rent at the beginning of their tenancy (i.e., they did not move into an unaffordable unit to access Rent Supplement payments) and that their inability to cover their rental costs is due to a change in financial circumstances. Rent Supplement is also available to cover the costs of accommodations for the homeless or for individuals living in an institution, such as a hospital or a long term care facility.

In Ireland, social housing is operated by Local Housing Authorities (LHAs) and is provided to households that cannot afford to buy their own homes. Housing is allocated according to a household's eligibility and need, which includes an assessment of household income. Rents in social housing settings are determined based on the household's ability to pay.

Similarly, housing benefits are determined based on the household's ability to cover the cost of their rent. Adult applicants 24 years of age or under who are living in their parents' home are required to report part of their parents' income in their means test under what is known as a *benefit and privilege* from living with one's parents.

## Relationship between housing type and social assistance/housing benefits

Households living in a private rented unit and waiting for housing through a local housing authority (LHA) may be eligible for the Rent Supplement. The purpose of the Rent Supplement is to help cover the costs of private rental units for social assistance recipients waiting to be placed in LHA housing.

## Netherlands

### Policy context

The social insurance system in the Netherlands has three components: social security, old age pension and social assistance benefit, which is regarded as the country's social safety net. These programs are defined in the 2004 Work and Social Assistance Act, or *Wet werk en bijstand* (WWB).

The Netherlands' social assistance system is based on the premise that individuals should support themselves independently (Government of the Netherlands, 2016). Income support is provided to those looking for work in order to ensure a level of income sufficient to provide a minimum acceptable lifestyle.

Social assistance in the Netherlands is governed by the Ministry of Social Affairs and Employment, which sets general benefit levels and implements national labour market integration policies. Benefits are administered locally by municipalities in accordance to regulations and policy rules.

Promoting the availability of adequate housing is the responsibility of the Dutch government; however, municipalities can set their own housing strategies. For instance, the City of Amsterdam is currently working on its Housing Vision 2020 which outlines a series of objectives intended to encourage private home ownership. This municipal housing strategy was paired with a number of local policy changes meant to facilitate greater participation in the housing market, more diverse neighbourhoods, affordable and sustainable housing developments, renewal in urban neighbourhoods, and high quality housing.

## Overview of social assistance programs

General social assistance payments in the Netherlands are intended to cover normal costs of living, including the costs of food, housing, heating, furniture and recreation. The Dutch national government specifies three minimum basic benefit payment rates for persons between 21 and 65 years of age related to family composition.

The government is anticipating changing the current means test based on household income for one that examines the total government benefits received by the household. This will ensure that benefits cannot be accumulated within households, giving households on benefits a higher income than those that work.

### *Eligibility criteria*

Eligibility criteria for the Dutch social assistance system under the WWB include the following:

- Claimants must legally reside in the Netherlands and have inadequate financial resources to meet their essential living costs;
- Claimants must be actively applying for work, must accept jobs that may not directly fit training or experience, and cannot refuse support such as additional training;
- Claimants must cooperate with home visits and psychological and medical examinations, if necessary;
- Claimants must provide correct information, including any and all relevant financial information;
- Claimants must also be registered with their local employment agency.

The Dutch Government intends to amend the Work and Social Assistance Act (WWB) to penalize individuals who have not met the obligation to seek work by halting their social assistance benefits for a period of three months. After this period, individuals can reapply.

## Regional variations in social assistance rates

Rates are set nationally, however benefits are delivered by the municipality and the municipality determines whether a person can receive a benefit.

## Additional benefits provided through or outside social assistance programs

Special assistance is provided by municipalities to cover exceptional but necessary costs due to special circumstances, and which constitute a large portion of household expenditures.

Municipalities are responsible for determining if costs meet specified conditions, such as an inability to have the costs reimbursed through other means, costs being accrued in the Netherlands, and costs being higher than a threshold amount set by the municipality.

Families living or working in the Netherlands with a child under the age of 18 and an annual household income under 46,700 euros automatically receive the Child Benefit. This money, distributed by the Social Insurance Bank (Sociale Verzekeringsbank), is intended to help cover expenses associated with raising a child.

Pensioners who do not receive a full Dutch pension (as defined under the National Old Age Pensions Act, or AOW in Dutch) and who do not meet the minimum income threshold are eligible for income support under the WWB.

## Overview of shelter, housing or rental allowances within social assistance programs

The Dutch housing benefit is based on current rent levels and taxable income. Only low income households can receive housing benefits. The maximum annual income a person can receive before they are exempt from receiving housing benefits varies by household size and age. As of January 1, 2016, a single person regardless of age must have an annual income less than €22,100, a household with more than one person of working age must have an income less than €30,000, while a household with more than one person over the pension age must have an income less than €30,050.

Housing allowance eligibility and amounts are determined by a number of annually set limits, set on the 1<sup>st</sup> of January of each year. The housing allowance limit (also known as the deregulation limit, or *hurrtoeslaggrens*) determines whether a household can receive housing benefits. Only households whose rent is less than the housing allowance limit can receive housing benefits. In 2016, the housing allowance limit was equal to €710.68 per month (Rijksoverheid, 2016).

The underlying principle to housing benefits is that every household always pays part of the rent itself, referred to as the “base rent” (or *basishuur*). In 2016, the base rent was equal to €231.87 for a single-person household of working age (less than 65 years) and €231.87 for a household with more than one person of working age. Standard rents are adjusted slightly for individuals over the age of retirement: €230.05 for a single person and €228.24 for a household with more than one person. A household must pay this amount of rent in full before they can receive housing benefits.

Between the base rent and the housing allowance limit are a number of limits which influence the amount of shelter allowance a person can receive (Woonbond, 2016)

1. Quality discount limit (*Kwaliteitskortingsgrens*): The amount between the base rent and the quality discount border is completely covered by housing benefits. In 2016, this limit was set at €409.92.

2. Low capping limit (*lage aftoppingsgrens*): 65% of the household rent between the quality discount limit and the low capping limit is covered by the housing benefit. The low capping limit is available for single-person and two-person households composed of working age adults (between 23 years of age and the age of retirement). The low capping limit is currently set at €586.68.
3. High capping limit (*hoge aftoppingsgrens*): For households composed of three persons or more, the high capping limit is used. For these households, 65% of the household rent between the quality discount limit and the high capping limit is covered by the housing benefit. The high capping limit is currently set at €628.76.
4. Housing allowance limit (*huurtoeslaggrens*): The housing allowance limit is the upper bound of the housing benefit. Forty per cent of the rental amount between the capping limit (either high or low, depending on the household size) and the housing allowance limit will be covered by the housing benefit. Rents that are valued above the housing allowance limit are not eligible for any housing benefit.

Housing benefits are calculated separately from social assistance benefits. However, most households that receive social assistance have an income level sufficiently low as to qualify for housing benefits as well. In these cases, housing benefits are calculated from the social assistance benefit or the gross unemployment benefit as reference for household income.

About 75 per cent of all rental units in the Netherlands are owned by local, not-for-profit housing associations, which are also responsible for provision of social housing.

## Relationship between housing type and social assistance/housing benefits

Social housing tenants on low incomes are entitled to a housing benefit if their rent is relatively high.

## United Kingdom

### Policy context

The provision of welfare and income assistance in the United Kingdom (UK) is the responsibility of the UK Government, through the Department of Work and Pensions. However, under the UK's devolution agreements, local governments in Scotland, Northern Ireland, and Wales have authority over housing policy, including the provision of social housing.

According to a study by the London School of Economics' Centre for Economic Performance (Hilber, 2015), UK house prices per square metre were the second highest in the world in 2014, second only to Monaco. The study's authors identified a number of government policies that reportedly have restricted the supply of housing in London and led to a decline in new housing starts, including legislation and regulations over building heights and limits on development.

In 2011, the UK government introduced its housing strategy for England, "Laying the Foundations." The strategy calls for immediate structural changes in the housing sector in order to increase the

supply of housing and reform social and affordable housing schemes, including an investment of £4.5 billion in new affordable housing.

## Overview of social assistance programs

The United Kingdom offers a number of social assistance programs and benefits to eligible applicants. The two main programs for income assistance are:

1. **Jobseeker's Allowance** is a benefit intended to help individuals who are out of work but are looking for work. The income-based allowance component of the program is given to individuals who satisfy a needs test. Rates are provided for qualified adults. Parents of children under 16 years of age can also receive the **Child Benefit**.
2. **Income Support**: a program of last resort, for those who have no income or very little income but do not qualify for Jobseeker's Allowance. Eligibility requirements for Income Support are much stricter and are limited to people who have specific needs, such as those who are pregnant, a carer, a lone parent with a child under age 5, or have little or no income).

Low income households can also receive a **Housing Benefit** to cover some of the costs of renting. Different rates apply, depending on whether the claimant is living in social housing or in a private dwelling.

### *Universal Credit*

In 2013, the United Kingdom began transitioning its social assistance programs towards a single benefit called the **Universal Credit**. The new benefit was introduced in October 2013 using a phased approach, progressively being rolled out to Job Centres across Great Britain with the implementation of the program expected to be completed by the end of 2017.

The government outlined its main issues with the current system in a policy brief, updated in 2015. According to the government the system is “too complex” and does not provide sufficient “incentives to encourage people on benefits to start paid work or increase their hours” (Department for Work & Pensions, 2015). The changes to the system were intended to make the benefit system fairer and more affordable, to reduce poverty, to decrease worklessness and welfare dependency, and reduce administrative errors and fraud.

The main changes introduced through the Universal Credit benefit including allowing low income households to access the benefit whether they are in work or looking for work, allowing claimants to apply and manage their accounts online, the benefit is responsive and allows claimants to move in and out of work, and payments are made on a monthly basis.

The Universal Credit combines six means-tested payments and benefits into a single monthly payment for people who are employed or out of work: Income Support, income-based Jobseeker's Allowance, income-related Employment and Support Allowance, Housing Benefit, Child Tax Credit, and Working Tax Credit. The Universal Credit is being introduced gradually between April 2013 and 2017. The maximum a household can claim under the Universal Credit varies by age and household type; however, the amounts are consistent with the Jobseeker's Allowance amounts.

By 2017, Universal Credit will have replaced the benefits available under the UK's social assistance program, although new claimants are being offered the Universal Credits in regions where the scheme has been introduced. The income-related elements of the Jobseeker's Allowance (JSA) and Employment and Support Allowance (ESA) are being removed as the Universal Credit is implemented. The Housing Benefit will also disappear, being incorporated within the Universal Credit payment.

The UK's current benefit structure is paid to claimants on a bi-weekly basis, with the Housing Benefit being paid directly to the landlord. Under the Universal Credit, claimants will receive a single monthly payment deposited directly into their bank account. Couples who qualify for the Universal Credit will receive a joint payment in one bank account.

In April 2013, the government introduced a weekly and monthly Benefit Cap, which limits how much a household can claim in total benefits. Households where the claimant is over the Pension age are exempt from the Benefit Cap. The cap is currently set at £350 per week or £1,517 per month for a single adult with no children and £500 per week or £2,167 per month for a couple or single parent, regardless of the number of children they have. The government has announced that they intend to lower the benefit cap in November 2016.

### Eligibility criteria

Each of the programs identified above have specific eligibility criteria, described below. To be eligible for the **Jobseeker's Allowance**, claimants must:

- Be over 18 and under the Pension age;
- Be able and available for work;
- Be actively looking for work;
- Work less than 16 hours per week;
- Satisfy the residency requirement; and
- Not be enrolled in school full-time (full-time students are not eligible).

The **income-based Jobseeker's Allowance** is available to claimants if one of the following applies:

- The person was paid less than £153 per week (CAD \$272) on average over the last two years when they were employed;
- They have been claiming contribution-based Jobseeker's Allowance for over 182 days; or
- They haven't worked in the past two years.

The **Jobseeker's Allowance** is available to 16 or 17 year olds who:

- Are forced to live away from their parents;
- Have a partner and dependent children; or
- Find it very hard to live without Jobseeker's Allowance.

Finally, to be eligible for **Income Support**, a person must:

- Be between the age of 16 and the Pension Credit qualifying age;
- Be pregnant, a carer, a single parent with a child under the age of 5, or unable to work because they're sick or living with a disability;
- Have no income or a low income;
- Be working less than 16 hours a week, and their partner works less than 24 hours a week; and
- Be living in England, Scotland or Wales.

### Regional variations in social assistance rates

Social assistance rates are set at the national level. In the case of additional benefits, eligibility requirements may vary depending on where the person resides, if similar schemes are provided by local governments. For example, the Jobseeker's Allowance in Northern Ireland has different eligibility criteria than in the rest of the UK, and the Universal Credit is not available in Northern Ireland.

### Additional benefits provided through or outside social assistance programs

**Universal Credit** recipients who have dependent children can also claim additional benefits on top of their monthly benefits. This includes per child payments (see summary tables in the appendix) and childcare costs (up to 85% of the costs: £646.35 for one child and £1,108.04 for two or more children).

**Council Tax Reduction** schemes are available for people with low incomes to help pay council taxes, which are based on the value of the property. Local authorities in England are responsible for running their own local schemes for help with council taxes.

### Overview of shelter, housing or rental allowances within social assistance programs

In the UK, the Housing Benefit is available for individuals living in council housing (owned and operated by local authorities) and social housing (owned by private, not-for-profit housing associations). The value of the benefit is determined on an assessment of reasonable rent for a property in the person's area that would be suitable for members of the household, whether the claimant has a spare bedroom, household income, and general circumstances (e.g., age of persons in the household and any individuals living with a disability).

The amount provided in housing benefits can be reduced if a client lives in council or social housing and has a spare bedroom. The reduction in benefits is equivalent to 14 per cent in eligible rent for one vacant bedroom and 25 per cent in eligible rent for two or more vacant bedrooms. The government will also specify which residents of council or social housing are expected to share a bedroom (for example, an adult couple, two children under the age of 16 of the same sex, and two children under the age of 10 regardless of sex).



The current Housing Benefit is paid directly to landlords. Under the Universal Credit, however, the Housing Benefit will be integrated within the benefit structure paid directly to the individuals rather than paying landlords directly. This shifts responsibility for paying the cost of accommodation to the Universal Credit claimant. The government does not provide maximum housing benefits amounts under the Universal Credit scheme, but indicates that housing costs can be included within the payments for eligible claimants.

### Relationship between housing type and social assistance/housing benefits

The UK's Local Housing Allowance (LHA) is part of the Housing Benefit, but is provided to households living in private rented units. The LHA is a way of calculating the Housing Benefit based on household size and the area in which a person lives, and is paid directly to the claimant rather than to the landlord. LHA rates are set at the 30th percentile market rent in the household's area.

## New York State (United States)

### Policy context

In the United States, social assistance policy is administered through a combination of federal and state programs. Programs are largely operated and delivered by the state, although funding and some guidelines do come from the Federal government.

In New York State, the Office of Temporary and Disability Assistance administers social assistance, and has the following mission:

- To enhance the economic security of low income working families;
- To assist work-capable public assistance recipients in achieving entry into the workforce;
- To assist individuals with priority needs other than work-readiness in accessing appropriate benefits and services; and
- To enhance child well-being and reduce child poverty.

In addition to that mission, a chief concern for social assistance policy in New York is the transition from social assistance to self-sufficiency, including proper assessment of individual needs and barriers. Thus, their social assistance program focuses on employment wherever possible.

In 2012, the New York Senate passed the Public Assistance Integrity Act to prevent social assistance recipients from using their benefits to purchase cigarettes, alcoholic beverages, lottery tickets, or for casino gambling. Federal law passed earlier in the year required states to limit such transactions for social assistance recipients before February 2014, with failure to comply resulting in state loss of funds from the Temporary Assistance to Needy Families (TANF) program.

## Overview of social assistance programs

### *Social assistance programs*

New York State's social assistance system is a combination of federal and state funded programs, known as Temporary Assistance (TA). TA is administered by the State of New York's Office of Temporary and Disability Assistance and is provided through two major programs:

**Family Assistance (FA):** FA is operated and delivered by the State, although it is funded in part by the Federal government and must follow the Federal Temporary Assistance for Needy Families (TANF) guidelines.

Under this program, families that include a child under 18 (or under 19 and enrolled in secondary school) living with a parent or a caretaker relative, can receive benefits for a total of 60 months in a lifetime, including any federal TANF benefits received in other states. Adults who receive the benefits and are able to work must comply with federal work requirements. FA recipients must cooperate with the state or local department of social services to locate an absent parent in order to collect support payments and other payments or property.

The FA allowance consists of a basic grant allowance, a home energy allowance, a supplemental home energy allowance, a shelter allowance and a fuel allowance, if heat is not included in the rent. Each allowance category has a maximum and varies according to family size. Additional allowances are available in certain cases where families have special needs that are not met by other benefits.

The *Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA)* provides funding to states for the TANF program. This federal law requires that states operate a temporary assistance program that ensures children from needy families receive proper care. The amount each state receives is based on the level of federal contributions to the state for TANF's predecessor program, AFDC, in 1994. Family Assistance is generally reimbursed 50 per cent from the federal TANF Block Grant. The state and local districts share the remaining 50 per cent. TANF cash benefits are set by the state.

**Safety Net Assistance (SNA):** SNA is funded in equal measure by the state and by local communities. SNA is only provided when the standard of need cannot be met by FA, emergency assistance programs, support from legally responsible relatives, or other sources. An individual or family can only receive cash SNA assistance for up to 24 months of their entire life. After an individual has received cash SNA for 24 months they can be categorized as non-cash SNA.

In addition to the FA and SNA, there are three emergency programs, intended for serious situations needing prompt action, which will last for a period of less than three months. Programs include:

- **Emergency Assistance to Needy Families with Children (EAF)** provides assistance to meet the temporary needs of pregnant women and families with at least one child under 18, or under 19 and enrolled in high school;

- **Emergency Assistance for Adults (EAA):** provides financial assistance to individuals and couples who are eligible for or receive Supplemental Security Income (SSI) to cover the costs of a temporary emergency; and
- **Emergency Safety Net Assistance (ESNA):** a one-time grant to single adults and childless couples facing an emergency provided under the Safety Net Assistance program.

### *Eligibility criteria*

Eligibility for Family Assistance is dependent on satisfaction of a number of criteria, including:

- Falling within the age range;
- Being responsible for the welfare of child or minor (under the age of 18, or 19 if enrolled in high school);
- Living within the State of New York;
- The family's living arrangements; and
- The relationship between the child and the relative claiming family assistance.

### Regional variations in social assistance rates

Shelter allowances are determined by the social services district where the person resides. "Social services districts" are defined by either the county department of social services (for all counties in the State of New York with the exception of New York City) or the city department of social services (in the case of New York City).

### Additional benefits provided through or outside social assistance programs

The **Supplemental Nutrition Assistance Program (SNAP)** is a monthly benefit program intended to help low income working people, seniors, the disabled and others purchase food at authorized stores. The benefits are provided through an electronic benefit card. Eligibility and benefit levels are based on household size, income, expenses and other factors. The maximum SNAP benefit monthly allowance ranges from USD \$194 for a single person household, to USD \$1,169 for a household of 8 people, with USD \$146 added for every additional person.

Individuals who receive SNAP allowance can participate in the free **Eat Smart New York (ESNY)** program, which teaches families how to eat healthy on a budget.

Pregnant women and new mothers are eligible under certain circumstances for the **Special Supplemental Nutrition Program for Women, Infants and Children (WIC)** program, which provides nutrition education, breastfeeding support, referrals and a variety of nutritious foods to low income pregnant, breastfeeding or postpartum women, infants and children up to age five.

The **Home Energy Assistance Program (HEAP)** is a federally funded program that provides assistance to low income households with the cost of their heat and energy costs. It is also provided in cases of emergency. The Regular Benefit is provided through the winter, from mid-November to

the end of March. The Emergency Benefit is available from the beginning of January until the end of March. This service also provides assistance to repair or replace heating equipment, available from November to January, and Cooling Assistance on a first-come-first-served basis from May to August to cover the cost of air conditioning for an individual with a health condition.

**School Breakfast and Lunch Programs** are federal programs that provide free, reduced-price or full-priced breakfast and lunch at participating schools throughout New York State. The cost of the meals depends on the income level of the household, but the meals remain the same for all those who qualify.

**Medicaid** is a service provided to certain qualified individuals, including those receiving TANF, to cover the costs of medical care. Children can acquire insurance through Children's Medicaid or through Child Health plus, depending on the family's income.

The **New York Prescription Saver** (NYPS) is a pharmacy discount card that can lower the cost of prescriptions by as much as 60 per cent on generics and 30 per cent on brand name drugs. Households with an annual income of less than USD \$35,000 for singles or USD \$50,000 for married couples are eligible, and who are between 50 and 65 years of age or are disabled.

### Overview of shelter, housing or rental allowances within social assistance programs

Shelter allowances are provided as part of the Temporary Assistance for Needy Families (TANF) program. As mentioned above, shelter allowances vary based on county of residence, in order to reflect regional variation in housing costs.

In addition, the U.S. Department of Housing and Urban Development (HUD) provides rental assistance for low-income residents, through two major methods:

- The **Housing Choice Voucher Program**, administered through state and local public housing authorities, is the federal government's major program for assisting very low-income families, the elderly, and the disabled to afford adequate housing in the private market.
- HUD helps apartment owners offer reduced rents to low-income tenants. They list all eligible apartments through an online portal and provide contact information for management offices so residents can apply directly.

### *Benefits for individuals living in special accommodations*

In general, Medicaid pays for care in a nursing home; care through home health agencies and personal care; and treatment in psychiatric hospitals (for persons under 21 or those 65 and older), mental health facilities, and facilities for people with developmental disabilities.

Spouses of persons who are institutionalized or living in a nursing home are able to keep some income, known as a minimum monthly maintenance needs allowance (MMMNA). Spouses receiving income in excess of the MMMNA are asked to contribute 25 per cent of the excess income to the cost of care for the institution.

## Relationship between housing type and social assistance/housing benefits

Shelter allowances are provided for public housing up to the same maximum rate used by private market housing, or up to the amount actually paid, whichever is less. As of 2009, public housing authorities can charge rent up to the shelter allowance maximums.

## 4. Rate comparisons

To address the question of how social assistance and housing benefits compare to adequacy benchmarks for persons with low incomes, we make three different comparisons:

1. Total social assistance benefits to minimum wage income
2. Total social assistance benefits to a Low Income Measure (LIM)
3. Housing benefits to average market rents

### Total social assistance benefits to minimum wage income

The table and figures below compare total social assistance benefits (including both basic and housing benefits) to minimum wage income for adults in the household. Minimum wage income is calculated based on the hourly wage, a 40-hour per week schedule, and an average month (calculated at 4.35 weeks in a month). All figures have been converted to Canadian dollars using the OECD's Purchasing Power Parity for GDP, 2015.

**Table 1 Total social assistance benefits to minimum wage income**

Jurisdiction	Total monthly social assistance rates by household composition (as of July 1, 2015)				Minimum wage (MW) (as of July 1, 2015)			Proportion of benefits to MW income (Benefit/Income) <sup>1</sup>			
	Single adult, no children	Couple, no children	Single adult, two children	Couple, two children	MW rate (hourly)	Monthly MW income (one adult)	Monthly MW income (two adults)	Single adult, no children	Couple, no children	Single adult, two children	Couple, two children
Australia <sup>2</sup>	\$1,153	\$1,884	\$1,268	\$1,937	\$14.20	\$2,470	\$4,940	47%	38%	51%	39%
Finland <sup>3</sup>	\$1,332	\$2,092	\$2,839	\$3,441	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Ireland <sup>4</sup>	\$2,007	\$3,167	\$3,080	\$3,895	\$12.98	\$2,257	\$4,514	89%	70%	136%	86%
Netherlands <sup>5</sup>	\$1,968	\$2,590	\$1,968	\$2,590	\$12.74	\$2,209	\$4,418	89%	59%	89%	59%
United Kingdom <sup>6</sup>	\$2,586	\$2,909	\$3,560	\$3,560	\$11.58	\$2,013	\$4,026	128%	72%	177%	88%
New York State <sup>7</sup>	\$621	\$819	\$1,055	\$1,267	\$11.04	\$1,919	\$3,838	32%	21%	55%	33%

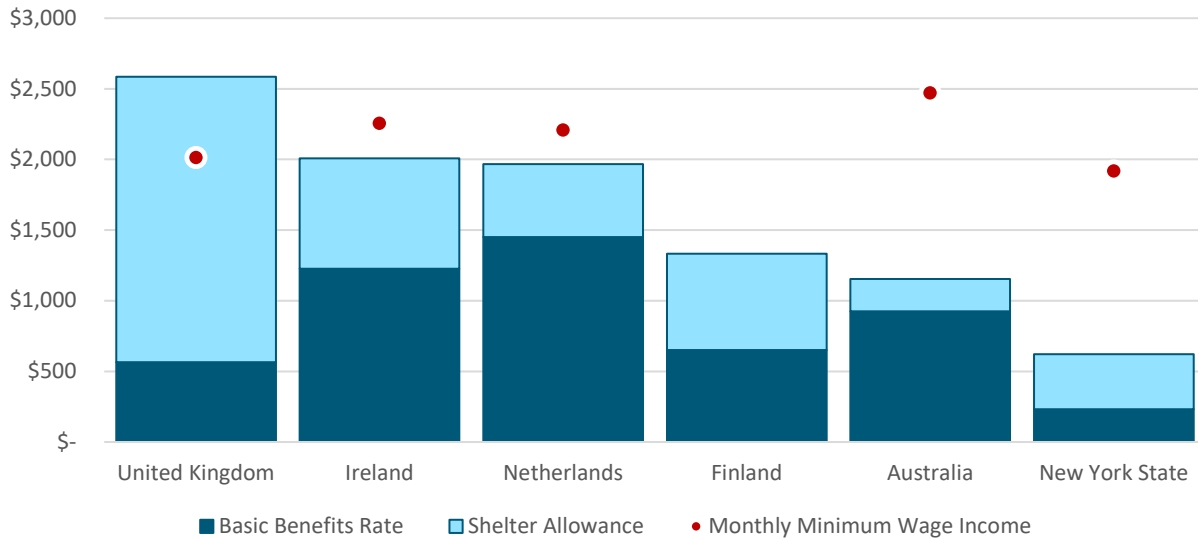
**Notes:**

- (1) Benefits are compared to the minimum wage income for one adult for households categorized as "Single adult, no children" and "Single adult, two children," and minimum wage income for two adults for households categorized as "Couple, no children" and "Couple, two children."
- (2) Australia's rates for the Special Benefit represent the maximum allowances available under the Newstart Allowance and Rent Assistance.
- (3) Finland does not have a national minimum wage. Collective agreements between trade unions and employer associations determine the minimum wages within a given sector. Both social assistance rates and housing benefits are taken for a person living in Helsinki.
- (4) Ireland's rates include the Jobseeker's Allowance and the monthly rent limit for a person living in Dublin, excluding Fingal.

- (5) Minimum wage in the Netherlands increases gradually at about 16 per cent per year for workers between the ages of 15 and 23. Workers 23 years of age or older are subject to the same minimum wage. Minimum wage is set on a monthly, weekly, and daily basis, not hourly. The law does not stipulate how many hours there are in a full working week nor how many hours there are in a work day, but indicates that there are either 36, 38 or 40 hours in a full week. The hourly minimum wage presented in the table above is taken for a worker 23 years of age or older working 40 hours a week, five days a week, working therefore 8 hours a day. Housing benefits for the Netherlands were calculated using the step-wise approach described in Section 3 of this report for a household whose monthly rent is equal to the maximum housing limit, 710.68 euros. Households who pay rent above this threshold are not eligible for any housing benefits.
- (6) The United Kingdom's rates include the Universal Credit's basic standard allowance for a single person over the age of 25 and for a couple over the age of 25, as well as additional benefits such as per child amounts (formerly provided as tax credits). Under the Universal Credit, the Housing Benefit is no longer a separate payment, but included within the recipient's monthly allowance. We use the Housing Benefit tables as a proxy for the shelter benefits that a household may be eligible to receive under the Universal Credit scheme (amounts range from 1 bedroom for a single person or a couple without children; 2 bedrooms for a single parent with two children, 3 bedrooms for a couple with two children). The Child Benefit which is provided to families making less than £50,000 is also included in the calculation. The benefit cap was in effect for the household with a single parent with two children and a couple and two children. The benefit cap reduced the overall benefit to £500 a week (CAD \$891).
- (7) New York State's rates include statewide monthly grants and allowances, shelter allowances for the Suffolk district, the Statewide Monthly Home Energy Payment, and the Statewide Monthly Supplemental Home Energy Payment.

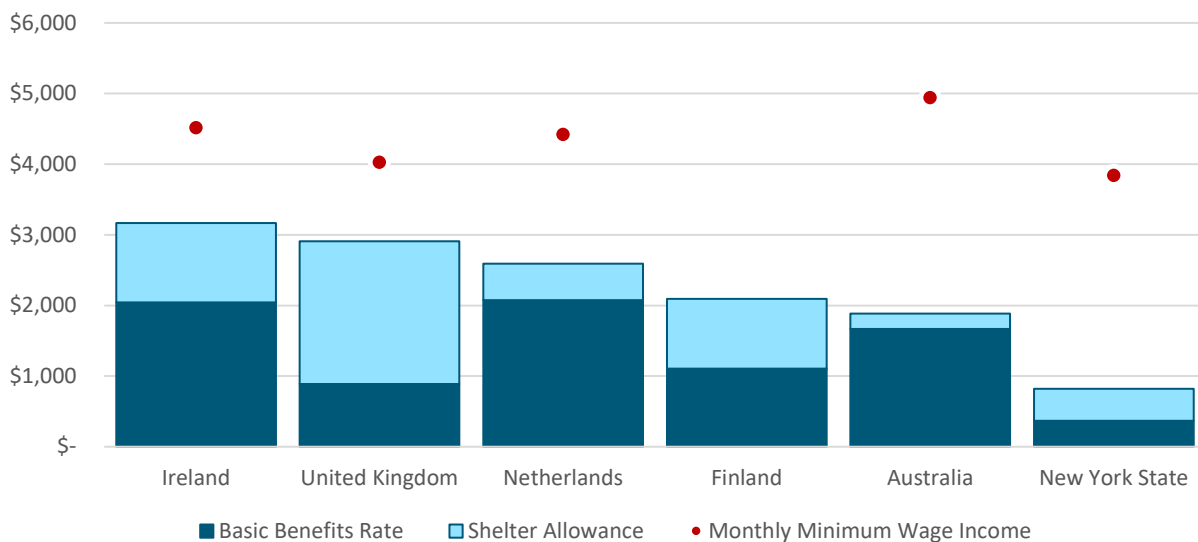


**Figure 1** Total social assistance benefits to minimum wage income for a single recipient with no children in descending order by total rate for each selected jurisdiction



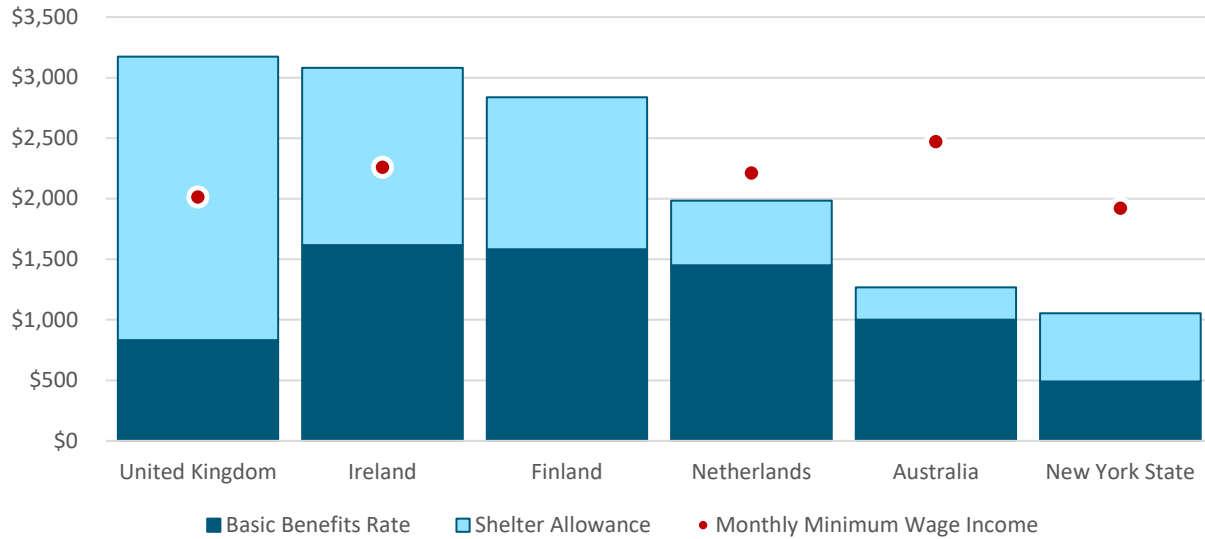
Note: Monthly minimum wage income considers the household income for a single full-time working adult.

**Figure 2** Total social assistance benefits to minimum wage income for couple with no children in descending order by total rate for each selected jurisdiction



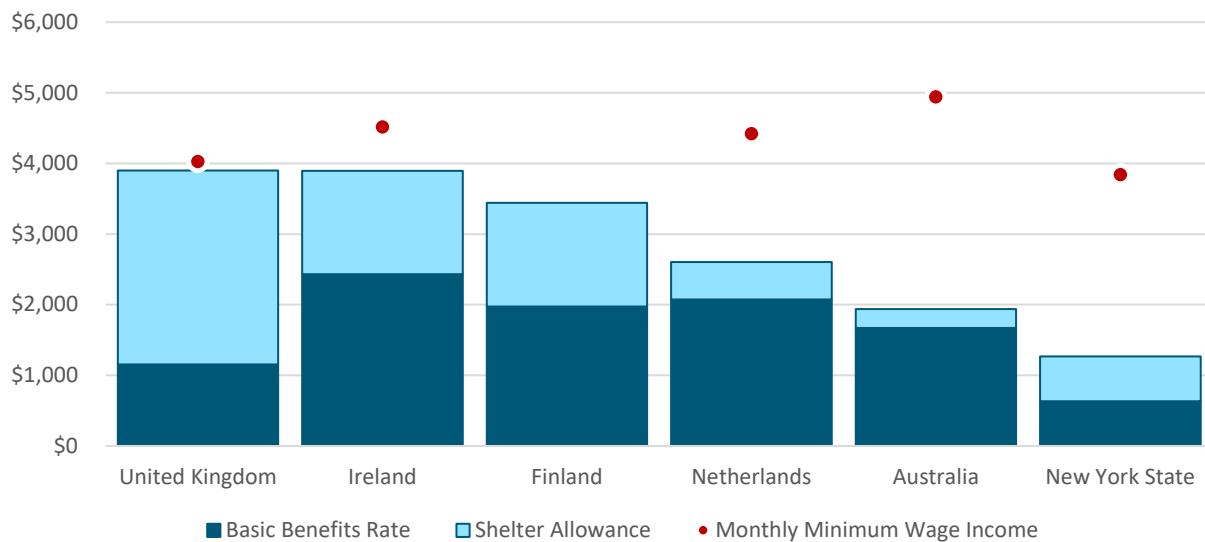
Note: Monthly minimum wage income considers the household income for two full-time working adults.

**Figure 3** Total social assistance benefits to minimum wage income for a single recipient with two dependent children in descending order by total rate for each selected jurisdiction



Note: Monthly minimum wage income considers the household income for a single full-time working adult.

**Figure 4** Total social assistance benefits to minimum wage income for a couple recipient with two dependent children in descending order by total rate for each selected jurisdiction



Note: Monthly minimum wage income considers the household income for two full-time working adults.

Total social assistance benefits accounted for 75 per cent or more of minimum wage income in three of the selected countries: Ireland, the Netherlands and the United Kingdom.

- In Ireland, monthly benefits for a single adult with no children were 89 per cent of minimum wage income for a single working adult, and benefits for a couple with no dependent children were 86 per cent of minimum wage income for two working adults. Benefits for a single adult with two dependent children actually exceeded minimum wage income for a single adult, accounting for 136 per cent of monthly income.
- In the Netherlands, monthly benefits for a single adult with no dependent children and a single adult with two dependent children both accounted for 89 per cent of monthly minimum wage income for a single adult
- In the United Kingdom, benefits for both a single adult with no dependent children and a single adult with two dependent children exceeded monthly minimum wage income for a single working adult, at 128 per cent and 177 per cent, respectively.

## Total social assistance benefits to Low Income Measure (LIM)

The table and figures below compares total social assistance benefits (including both basic and housing benefits) to a Low Income Measure (LIM) for each selected country. The LIM represents 50 per cent of a country's median adjusted income, where adjusted indicates that the household size is taken into account, to reflect the fact that its needs increase as the number of members increases.

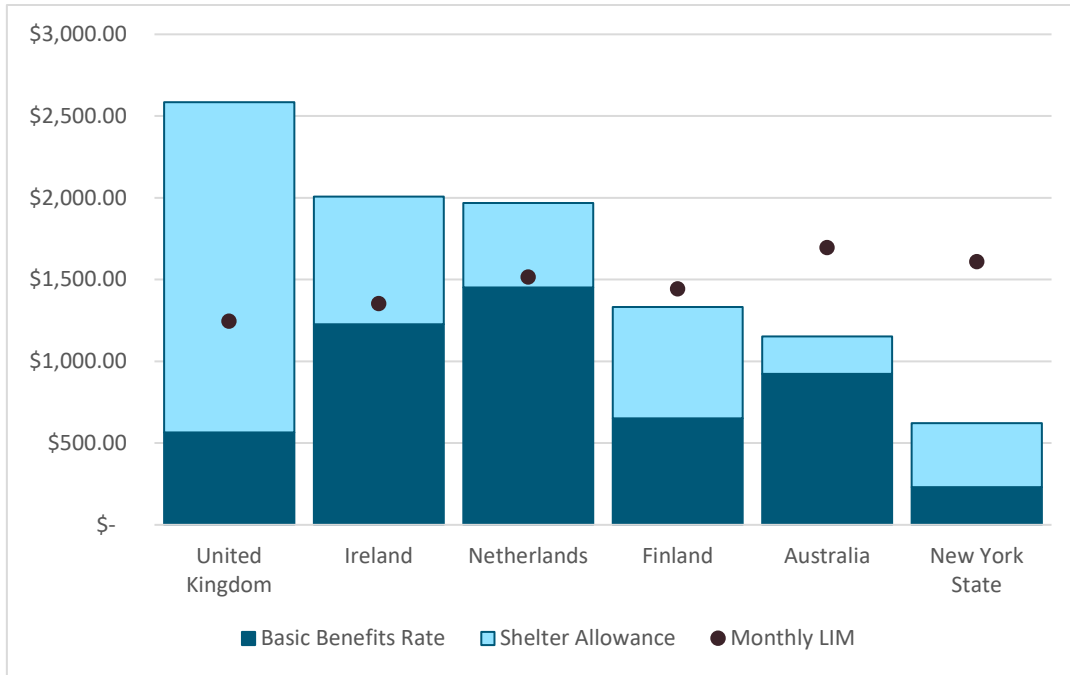
**Table 2 Total social assistance benefits to Low Income Measure (LIM)<sup>1</sup>**

Jurisdiction	Total monthly social assistance rates by household composition (as of July 1, 2015)				Monthly low income measure <sup>2</sup>				Proportion of benefits to LIM (Benefit/LIM)			
	Single adult, no children	Couple, no children	Single adult, two children	Couple, two children	Single adult, no children	Couple, no children	Single adult, two children	Couple, two children	Single adult, no children	Couple, no children	Single adult, two children	Couple, two children
Australia	\$1,153	\$1,884	\$1,268	\$1,937	\$1,697	\$4,801	\$2,940	\$6,790	68%	39%	43%	29%
Finland	\$1,332	\$2,092	\$2,839	\$3,441	\$1,443	\$4,082	\$2,499	\$5,772	92%	51%	114%	60%
Ireland	\$2,007	\$3,167	\$3,080	\$3,895	\$1,354	\$3,831	\$2,346	\$5,417	148%	83%	131%	72%
Netherlands	\$1,968	\$2,590	\$1,968	\$2,590	\$1,516	\$4,289	\$2,626	\$6,065	130%	60%	75%	43%
United Kingdom	\$2,586	\$2,909	\$3,560	\$3,560	\$1,246	\$3,525	\$2,159	\$4,986	207%	83%	165%	71%
New York State	\$621	\$819	\$1,055	\$1,267	\$1,611	\$4,555	\$2,789	\$6,442	39%	18%	38%	20%

**Notes:**

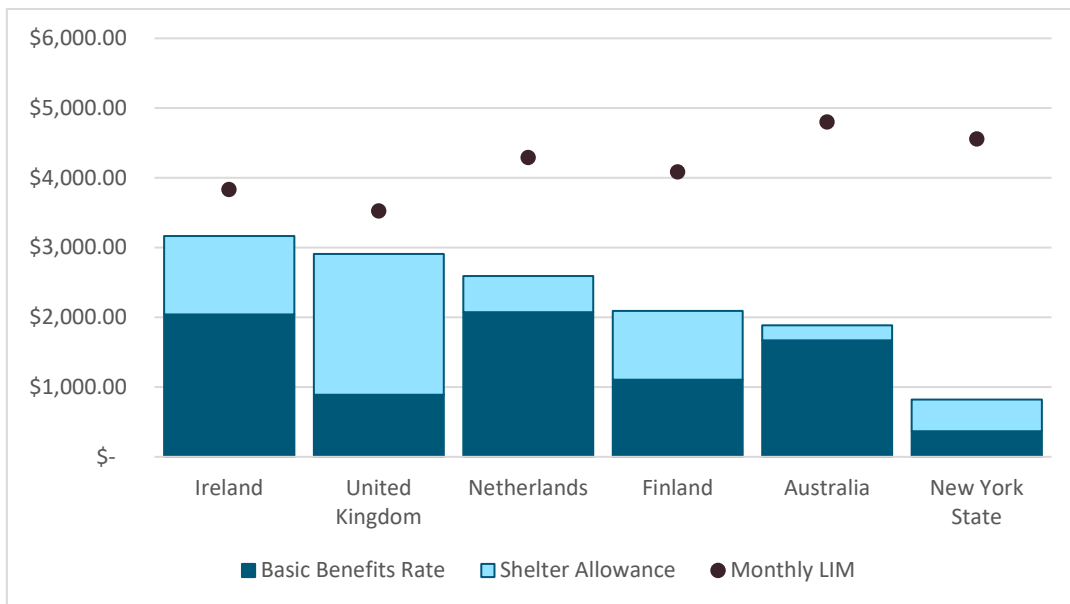
- (1) The data presented are consistent with those presented in Table 1. Detailed rate schedules can be found in the Appendix.
- (2) Low income measures are calculated as 50 per cent of the median adjusted monthly income, where adjusted indicates that the household size is taken into account to reflect the fact that it's needs increase as the number of members increase (Statistics Canada, 2015). The LIM for households including two adults assumes a two earner household. Median income data provided by the OECD's Income Distribution and Poverty data. Accessed online: <http://stats.oecd.org/index.aspx?queryid=66670>

**Figure 5** Total social assistance benefits to LIM for a single recipient with no children in descending order by total rate for each selected jurisdiction



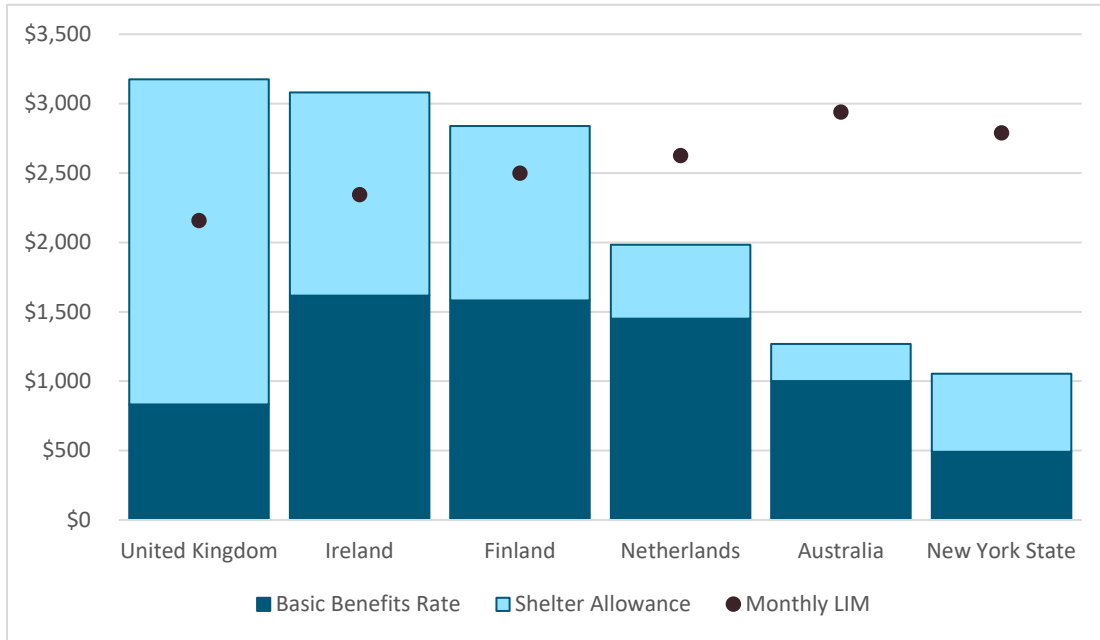
Note: Monthly LIM calculated for a single working adult, with a household size of one person.

**Figure 6** Total social assistance benefits to LIM for couple with no children in descending order by total rate for each selected jurisdiction



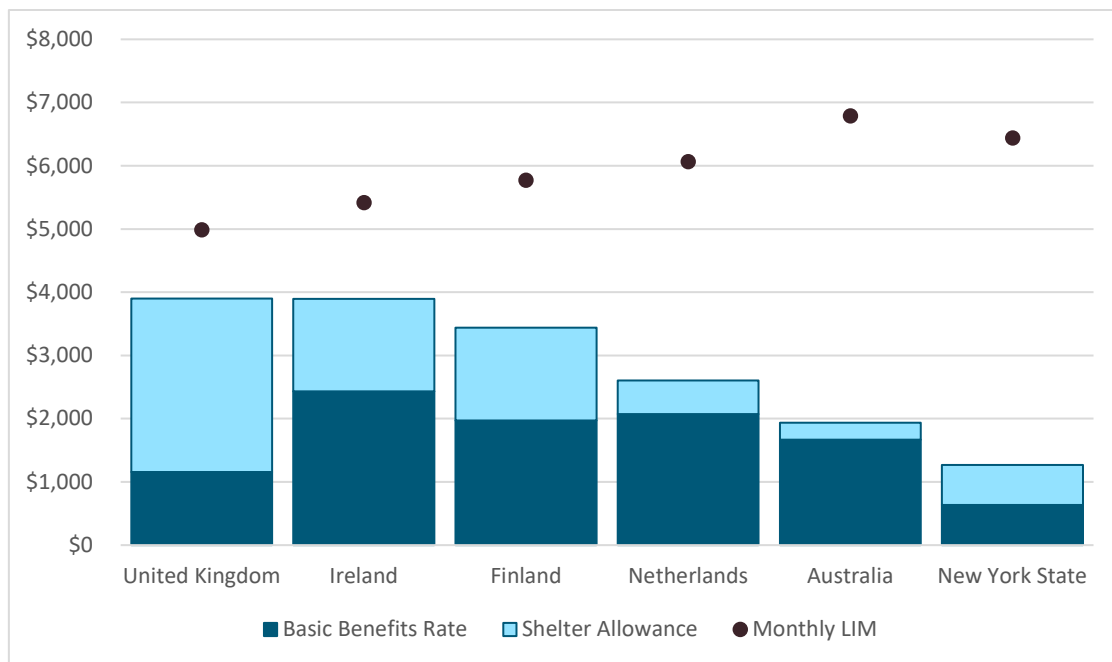
Note: Monthly LIM calculated for two working adults, with a household size of two people.

**Figure 7** Total social assistance benefits to LIM for a single recipient with two dependent children in descending order by total rate for each selected jurisdiction



Note: Monthly LIM calculated for a single working adult, with a household size of three people.

**Figure 8** Total social assistance benefits to LIM for a couple recipient with two dependent children in descending order by total rate for each selected jurisdiction



Note: Monthly LIM calculated for two working adults, with a household size of four people.

In four countries, total monthly social assistance benefits accounted for 75 per cent or more of the LIM: Finland, Ireland, the Netherlands and the United Kingdom.

- In Finland, total monthly benefits for a single adult with two dependent children accounted for 92 per cent of the LIM for a single adult with no dependent children, and 114 per cent of the LIM for a single adult with two dependent children.
- In Ireland, total monthly benefits accounted for 75 per cent or more of the LIM for a single adult with no dependent children (148 per cent), a couple with no dependent children (83 per cent), and a single adult with two dependent children (131 per cent).
- In the Netherlands, total monthly benefits accounted for 75 per cent or more of the LIM for two household types: 130 per cent for a single adult with no dependent children, and 75 per cent for a single adult with two dependent children.
- Similar to Ireland, total monthly benefits accounted for 75 per cent or more of the LIM for three household types in the United Kingdom: 207 per cent for a single person with no dependent children, 83 per cent for a couple with no dependent children, and 165 per cent for a single adult with two dependent children.

## Housing benefits to average market rents

The tables and figures below compare housing benefits to average market rents. Average market rents were retrieved from a variety of sources, including both governmental and non-governmental sources, such as cost of living databases. Average market rents are presented for both the most expensive rental market in each country, as well as the least expensive rental market. Only the most expensive rental markets are displayed in graphs below, however, in order to clearly illustrate the extent of gaps in adequacy and affordability.

## Most expensive rental market

**Table 3 Housing benefits to average market rents in the most expensive rental market for a single person with no dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$924	\$229	\$1,153	20%	\$1,712	13%
Finland <sup>3</sup>	\$651	\$681	\$1,332	51%	\$750	91%
Ireland <sup>4</sup>	\$1,227	\$780	\$2,007	39%	\$2,284	34%
Netherlands <sup>5</sup>	\$1,451	\$517	\$1,968	26%	\$1,073	48%
United Kingdom <sup>6</sup>	\$566	\$2,019	\$2,586	78%	\$1,669	121%
New York State <sup>7</sup>	\$231	\$390	\$621	63%	\$1,252	31%

**Notes:**

- (1) The data presented are consistent with those presented in Table 1. Detailed rate schedules can be found in the Appendix.
- (2) Average market rents for Australia represent the average costs of a 1 bedroom unit in Sydney's inner ring. Market rent data was provided by the New South Wales government, Rent and Sales Report No. 115. Accessed online: [http://www.housing.nsw.gov.au/\\_data/assets/file/0007/373840/R-and-S-Report-115.pdf](http://www.housing.nsw.gov.au/_data/assets/file/0007/373840/R-and-S-Report-115.pdf)
- (3) Average market rents for Finland represent the average costs of a 30 square metre non subsidized dwelling in Helsinki. Market rent data was provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a 1 bedroom unit in Dublin's most expensive neighbourhood. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) Market rent for the Netherlands is set at the housing benefit limit. A household whose rent exceeds the housing benefit limit is not eligible for any housing benefit. Therefore, the limit is chosen as the household rent in order to allow for a comparison between the shelter allowance received and household rent paid.
- (6) Average market rents for the UK represent the average costs of a studio apartment in London for May 2016. Data provided by the UK's Valuation Office Agency (VOA), accessed online: <https://www.gov.uk/government/statistics/private-rental-market-statistics-may-2016>
- (7) New York State average market rent data provided by the U.S. Department of Housing and Urban Development, for Suffolk County, for an efficiency apartment.



**Table 4 Housing benefits to average market rents in the most expensive rental market for a couple with no dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$1,669	\$215	\$1,884	11%	\$1,712	13%
Finland <sup>3</sup>	\$1,107	\$986	\$2,092	47%	\$1,248	79%
Ireland <sup>4</sup>	\$2,042	\$1,125	\$3,167	36%	\$2,284	49%
Netherlands <sup>5</sup>	\$2,073	\$517	\$2,590	20%	\$1,073	48%
United Kingdom <sup>6</sup>	\$890	\$2,019	\$2,909	69%	\$2,246	90%
New York State <sup>7</sup>	\$367	\$452	\$819	55%	\$1,653	27%

**Notes:**

- (1) The data presented are consistent with those presented in Table 1. Detailed rate schedules can be found in the Appendix.
- (2) Average market rents for Australia represent the average costs of a one bedroom unit in Sydney's inner ring. Market rent data provided by the New South Wales government, Rent and Sales Report No. 115. Accessed online: [http://www.housing.nsw.gov.au/\\_data/assets/file/0007/373840/R-and-S-Report-115.pdf](http://www.housing.nsw.gov.au/_data/assets/file/0007/373840/R-and-S-Report-115.pdf)
- (3) Average market rents for Finland represent the average costs of a 50 square metre non subsidized dwelling in Helsinki. Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a one bedroom unit in Dublin's most expensive neighbourhood. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) Market rent for the Netherlands is set at the housing benefit limit. A household whose rent exceeds the housing benefit limit is not eligible for any housing benefit. Therefore, the limit is chosen as the household rent in order to allow for a comparison between the shelter allowance received and household rent paid.
- (6) Average market rents for the UK represent the average costs of a one bedroom apartment in London for May 2016. Data provided by the UK's Valuation Office Agency (VOA), accessed online: <https://www.gov.uk/government/statistics/private-rental-market-statistics-may-2016>
- (7) New York State average market rent data provided by the U.S. Department of Housing and Urban Development, for Suffolk County, for a one bedroom apartment.

**Table 5 Housing benefits to average market rents in the most expensive rental market for a single person with two dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$1,000	\$268	\$1,268	21%	\$2,249	12%
Finland <sup>3</sup>	\$1,582	\$1,256	\$2,839	44%	\$1,748	72%
Ireland <sup>4</sup>	\$1,617	\$1,463	\$3,080	48%	\$2,608	56%
Netherlands <sup>5</sup>	\$1,451	\$533	\$1,984	27%	\$1,073	50%
United Kingdom <sup>6</sup>	\$1,218	\$2,342	\$3,560	66%	\$2,828	83%
New York State <sup>7</sup>	\$491	\$564	\$1,055	53%	\$2,608	22%

**Notes:**

- (1) The data presented are consistent with those presented in Table 5. Detailed rate schedules can be found in the Appendix.
- (2) Average market rents for Australia represent the average costs of a two bedroom unit in Sydney's inner ring. Market rent data provided by the New South Wales government, Rent and Sales Report No. 115. Accessed online: <http://www.housing.nsw.gov.au/data/assets/file/0007/373840/R-and-S-Report-115.pdf>
- (3) Average market rents for Finland represent the average costs of a 70 square metre non subsidized dwelling in Helsinki. Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a two bedroom unit in Dublin's most expensive neighbourhood. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) Market rent for the Netherlands is set at the housing benefit limit. A household whose rent exceeds the housing benefit limit is not eligible for any housing benefit. Therefore, the limit is chosen as the household rent in order to allow for a comparison between the shelter allowance received and household rent paid.
- (6) Average market rents for the UK represent the average costs of a two bedroom apartment in London for May 2016. Data provided by the UK's Valuation Office Agency (VOA), accessed online: <https://www.gov.uk/government/statistics/private-rental-market-statistics-may-2016>. The Benefit Cap, which limits weekly allowances to £500 (\$890 a week, \$3,560 a month), is applied to the Basic benefits rate, not on the shelter allowance.
- (7) New York State average market rent data provided by the U.S. Department of Housing and Urban Development, for Suffolk County, for a three bedroom apartment.

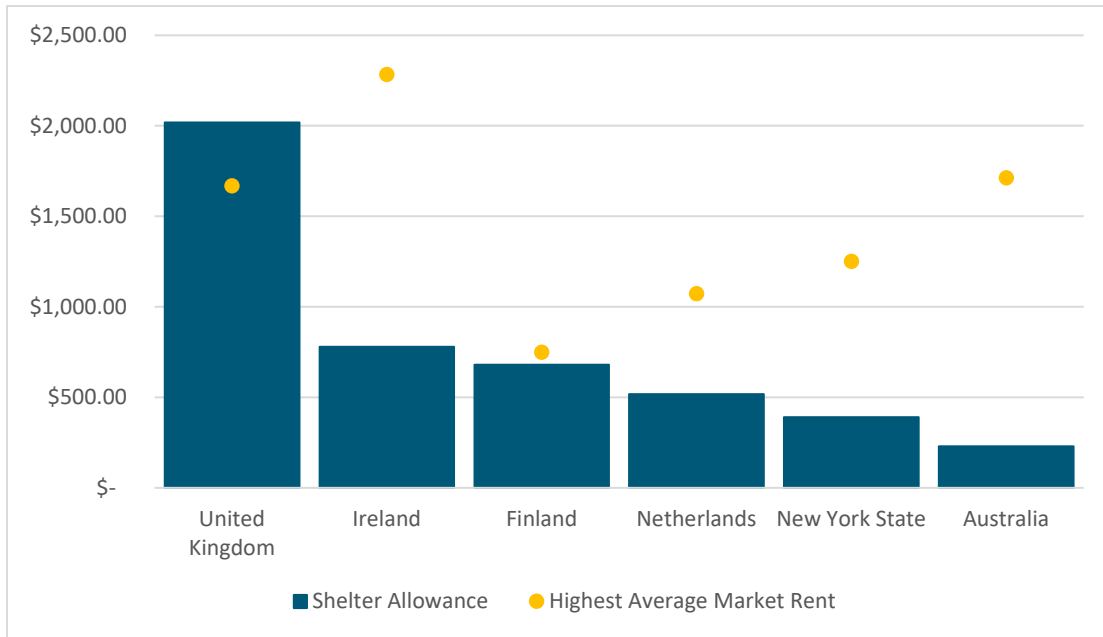
**Table 6 Housing benefits to average market rents in the most expensive rental market for a couple with two dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$1,669	\$268	\$1,937	14%	\$3,022	9%
Finland <sup>3</sup>	\$1,973	\$1,468	\$3,441	43%	\$2,497	59%
Ireland <sup>4</sup>	\$2,432	\$1,463	\$3,895	38%	\$3,048	48%
Netherlands <sup>5</sup>	\$2,073	\$533	\$2,606	20%	\$1,073	50%
United Kingdom <sup>6</sup>	\$814	\$2,746	\$3,560	77%	\$3,673	75%
New York State <sup>7</sup>	\$633	\$634	\$1,267	50%	\$2,608	24%

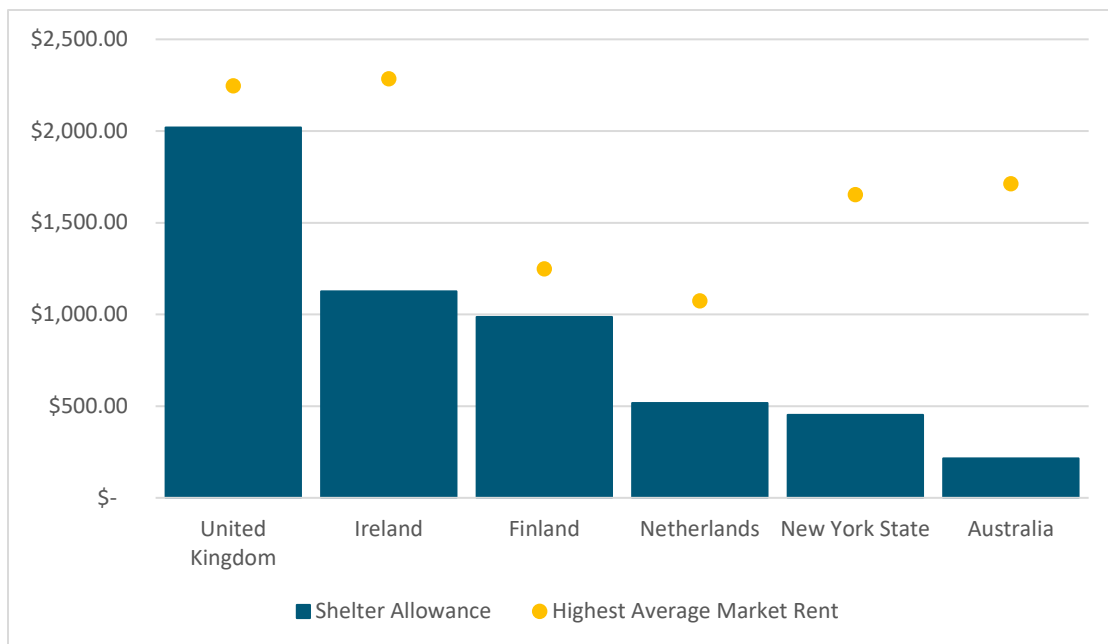
**Notes:**

- (1) The data presented are consistent with those presented in Table 1. Detailed rate schedules can be found in the Appendix.
- (2) Average market rents for Australia represent the average costs of a three bedroom unit in Sydney's inner ring. Market rent data provided by the New South Wales government, Rent and Sales Report No. 115. Accessed online: [http://www.housing.nsw.gov.au/\\_data/assets/file/0007/373840/R-and-S-Report-115.pdf](http://www.housing.nsw.gov.au/_data/assets/file/0007/373840/R-and-S-Report-115.pdf)
- (3) Average market rents for Finland represent the average costs of a 100 square metre non subsidized dwelling in Helsinki. Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a three bedroom unit in Dublin's most expensive neighbourhood. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) Market rent for the Netherlands is set at the housing benefit limit. A household whose rent exceeds the housing benefit limit is not eligible for any housing benefit. Therefore, the limit is chosen as the household rent in order to allow for a comparison between the shelter allowance received and household rent paid.
- (6) Average market rents for the UK represent the average costs of a three bedroom apartment in London for May 2016. Data provided by the UK's Valuation Office Agency (VOA), accessed online: <https://www.gov.uk/government/statistics/private-rental-market-statistics-may-2016>. The Benefit Cap, which limits weekly allowances to £500 (\$890 a week, \$3,560 a month), is applied to the Basic benefits rate, not on the shelter allowance.
- (7) New York State average market rent data provided by the U.S. Department of Housing and Urban Development, for Suffolk County, for a three bedroom apartment.

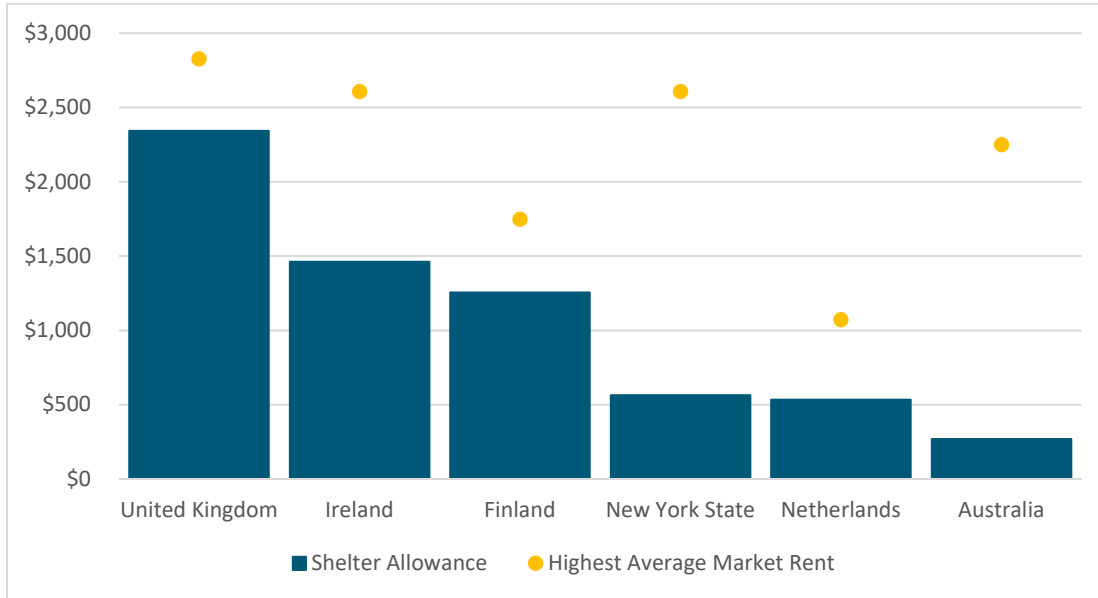
**Figure 9** Housing benefits to most expensive average market rent for a single recipient with no children for each selected jurisdiction



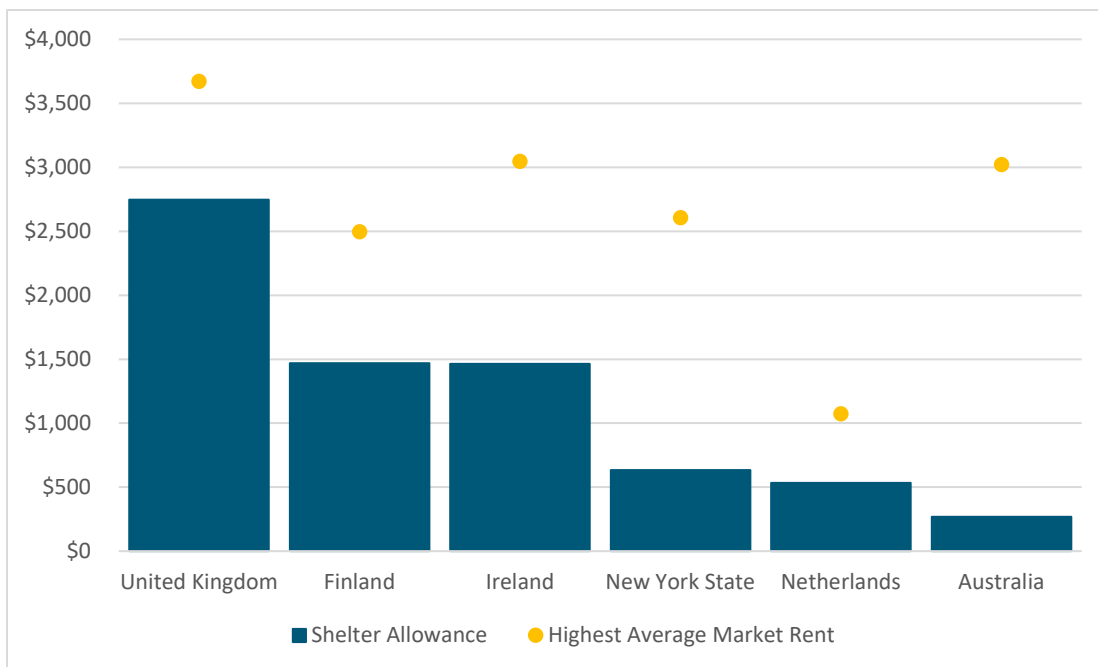
**Figure 10** Housing benefits to most expensive average market rent for a couple with no children for each selected jurisdiction



**Figure 11** Housing benefits to most expensive average market rent for a single recipient with two dependent children for each selected jurisdiction



**Figure 12** Housing benefits to most expensive average market rent for a couple with two dependent children for each selected jurisdiction



In the most expensive rental markets in each jurisdiction, Finland and the United Kingdom are the only governments that provide housing benefits equal to 75 per cent or more of the average market rent. In Finland, this is only the case for households composed of a single adult with no dependent children or two adults with no dependent children, whose housing benefits account for 91 per cent and 80 per cent (respectively) of average market rent in the most expensive rental market. In the United Kingdom, housing benefits are equal to 75 per cent or more of the average market rent of the most expensive rental market for all household types:

- For a single recipient with no children, housing benefits represent 121 per cent of the average market rent;
- For a couple with no children, housing benefits represent 90 per cent of the average market rent;
- For a single person with two dependent children, housing benefits represent 83 per cent of the average market rent; and
- For a couple with two dependent children, housing benefits represent 75 per cent of the average market rent.

Least expensive rental market

**Table 7 Housing benefits to average market rents in the least expensive rental market for a single person with no dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$924	\$229	\$1,153	20%	\$761	30%
Finland <sup>3</sup>	\$651	\$681	\$1,332	51%	\$461	148%
Ireland <sup>4</sup>	\$1,227	\$435	\$1,662	26%	\$519	84%
Netherlands <sup>5</sup>	\$1,451	\$269	\$1,720	16%	\$619	43%
United Kingdom <sup>6</sup>	\$566	\$2,019	\$2,586	78%	\$469	431%
New York State <sup>7</sup>	\$231	\$203	\$434	47%	\$518	39%

**Notes:**

- (1) The data presented are consistent with those presented in Table 1, unless otherwise noted under each jurisdiction. Detailed rate schedules can be found in the Appendix.
- (2) Median market rents for Australia represent the median costs of a one bedroom unit in Regional Queensland (excluding Brisbane). Market rent data provided by State of Queensland Residential Tenancies Authority. Accessed: <https://www.rta.qld.gov.au/Resources/Median-rents/Median-rents-quarterly-data/2016-Median-rents-quarterly-data>
- (3) Average market rents for Finland represent the average costs of a 30 square metre non subsidized dwelling in Regional Finland (excluding Helsinki). Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a one bedroom unit in Longford. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) The lower bound market rent for the Netherlands is set at the quality discount limit. A household whose rent meets the quality discount limit receives 100% housing benefits between the base rent and the value of their rent. The quality discount limit does not vary according to household size for working age adults.
- (6) Average market rents for the UK represent the average costs of a single room in Carmathenshire, Wales, 2015. Data provided by the Welsh Government's Statistics and Research on Private sector rents, accessed online: <http://gov.wales/statistics-and-research/private-sector-rents/?lang=en>
- (7) New York State shelter allowances in this section are for Franklin County, the district with the lowest shelter allowance provisions. Average market rent provided for a bachelor apartment in Franklin County, according to 2016 Fair Market Rents.

**Table 8 Housing benefits to average market rents in the least expensive rental market for a couple with no dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$1,669	\$215	\$1,884	11%	\$761	28%
Finland <sup>3</sup>	\$1,107	\$986	\$2,092	47%	\$768	128%
Ireland <sup>4</sup>	\$2,042	\$450	\$2,492	18%	\$519	87%
Netherlands <sup>5</sup>	\$2,073	\$269	\$2,341	11%	\$619	43%
United Kingdom <sup>6</sup>	\$890	\$2,019	\$2,909	69%	\$658	307%
New York State <sup>7</sup>	\$367	\$241	\$608	40%	\$543	44%

**Notes:**

- (1) The data presented are consistent with those presented in Table 1, unless otherwise noted under each jurisdiction. Detailed rate schedules can be found in the Appendix.
- (2) Median market rents for Australia represent the median costs of a one bedroom unit in Regional Queensland (excluding Brisbane). Market rent data provided by State of Queensland Residential Tenancies Authority. Accessed online: <https://www.rta.qld.gov.au/Resources/Median-rents/Median-rents-quarterly-data/2016-Median-rents-quarterly-data>
- (3) Average market rents for Finland represent the average costs of a 50 square metre non subsidized dwelling in Regional Finland (excluding Helsinki). Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a one bedroom unit in Longford. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) The lower bound market rent for the Netherlands is set at the quality discount limit. A household whose rent meets the quality discount limit receives 100% housing benefits between the base rent and the value of their rent. The quality discount limit does not vary according to household size for working age adults.
- (6) Average market rents for the UK represent the average costs of a one bedroom apartment in Carmathenshire, Wales, 2015. Data provided by the Welsh Government's Statistics and Research on Private sector rents, accessed online: <http://gov.wales/statistics-and-research/private-sector-rents/?lang=en>
- (7) New York State shelter allowances in this section are for Franklin district, the district with the lowest shelter allowance provisions. Average market rent provided for a one-bedroom apartment in Franklin County, according to 2016 Fair Market Rents.



**Table 9 Housing benefits to average market rents in the least expensive rental market for a single person with two dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$1,000	\$268	\$1,268	21%	\$907	30%
Finland <sup>3</sup>	\$1,582	\$1,256	\$2,839	44%	\$1,076	117%
Ireland <sup>4</sup>	\$1,617	\$510	\$2,127	24%	\$602	85%
Netherlands <sup>5</sup>	\$1,451	\$269	\$1,720	16%	\$619	43%
United Kingdom <sup>6</sup>	\$1,218	\$2,342	\$3,560	66%	\$766	306%
New York State <sup>7</sup>	\$491	\$327	\$818	40%	\$993	33%

**Notes:**

- (1) The data presented are consistent with those presented in Table 1, unless otherwise noted under each jurisdiction. Detailed rate schedules can be found in the Appendix.
- (2) Median market rents for Australia represent the median costs of a two bedroom unit in Regional Queensland (excluding Brisbane). Market rent data provided by State of Queensland Residential Tenancies Authority. Accessed online: <https://www.rta.qld.gov.au/Resources/Median-rents/Median-rents-quarterly-data/2016-Median-rents-quarterly-data>
- (3) Average market rents for Finland represent the average costs of a 70 square metre non subsidized dwelling in Regional Finland (excluding Helsinki). Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a two bedroom unit in Longford. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) The lower bound market rent for the Netherlands is set at the quality discount limit. A household whose rent meets the quality discount limit receives 100% housing benefits between the base rent and the value of their rent. The quality discount limit does not vary according to household size for working age adults.
- (6) Average market rents for the UK represent the average costs of a two bedroom apartment in Carmathenshire, Wales, 2015. Data provided by the Welsh Government's Statistics and Research on Private sector rents, accessed online: <http://gov.wales/statistics-and-research/private-sector-rents/?lang=en>. The Benefit Cap, which limits weekly allowances to £500 (\$890 a week, \$3,560 a month), is applied to the Basic benefits rate, not on the shelter allowance.
- (7) New York State shelter allowances in this section are for Franklin district, the district with the lowest shelter allowance provisions. Average market rent provided for a three bedroom apartment in Franklin County, according to 2016 Fair Market Rents.

**Table 10 Housing benefits to average market rents in the least expensive rental market for a couple with two dependent children<sup>1</sup>**

Jurisdiction	Maximum monthly social assistance rates			Proportion of shelter allowance to total benefits (Shelter/Total)	Average market rent	Proportion of shelter allowance to average market rent (Shelter/Rent)
	Basic benefits rate	Shelter allowance	Total monthly benefits			
Australia <sup>2</sup>	\$1,669	\$268	\$1,937	14%	\$1,143	23%
Finland <sup>3</sup>	\$1,973	\$1,468	\$3,441	43%	\$1,537	96%
Ireland <sup>4</sup>	\$2,432	\$510	\$2,942	17%	\$744	69%
Netherlands <sup>5</sup>	\$2,073	\$269	\$2,341	11%	\$619	43%
United Kingdom <sup>6</sup>	\$814	\$2,746	\$3,560	77%	\$874	314%
New York State <sup>7</sup>	\$633	\$368	\$1,001	37%	\$993	37%

**Notes:**

- (1) The data presented are consistent with those presented in Table 1, unless otherwise noted under each jurisdiction. Detailed rate schedules can be found in the Appendix.
- (2) Median market rents for Australia represent the median costs of a three bedroom unit in Regional Queensland (excluding Brisbane). Market rent data provided by State of Queensland Residential Tenancies Authority. Accessed online: <https://www.rta.qld.gov.au/Resources/Median-rents/Median-rents-quarterly-data/2016-Median-rents-quarterly-data>
- (3) Average market rents for Finland represent the average costs of a 70 square metre non subsidized dwelling in Regional Finland (excluding Helsinki). Market rent data provided by Statistics Finland (Tilastokeskus).
- (4) Average market rents for Ireland represent the average costs of a three bedroom unit in Longford. Data provided by Daft.ie's Rental Report for the first quarter of 2016, accessed online: <https://www.daft.ie/report/q1-2016-daft-rental-report.pdf>
- (5) The lower bound market rent for the Netherlands is set at the quality discount limit. A household whose rent meets the quality discount limit receives 100% housing benefits between the base rent and the value of their rent. The quality discount limit does not vary according to household size for working age adults.
- (6) Average market rents for the UK represent the average costs of a three bedroom apartment in Carmathenshire, Wales, 2015. Data provided by the Welsh Government's Statistics and Research on Private sector rents, accessed online: <http://gov.wales/statistics-and-research/private-sector-rents/?lang=en..> The Benefit Cap, which limits weekly allowances to £500 (\$890 a week, \$3,560 a month), is applied to the Basic benefits rate, not on the shelter allowance.
- (7) New York State shelter allowances in this section are for Franklin district, the district with the lowest shelter allowance provisions. Average market rent provided for a three bedroom apartment in Franklin County, according to 2016 Fair Market Rents.

In the *least* expensive housing markets in each country, housing benefits account for 75 per cent or more of average market rent more frequently, with various household types qualifying in Finland, Ireland, and the United Kingdom.

- In Finland, housing benefits account for 75 per cent or more of the average market rent in the least expensive rental market for a single person with no children (148 per cent), a couple with no children (128 per cent), a single person with two dependent children (117 per cent), and a couple with two children (96 per cent).
- In Ireland, housing benefits account for 75 per cent or more of the average market rent in the least expensive rental market for most household types: 84 per cent for a single recipient with no children, 87 per cent for a couple with no children, 85 per cent for a single person with two dependent children. Only in a household composed of a couple with two dependent children do housing benefits cover less than 75 per cent of the average market rent (69 per cent).
- In the United Kingdom, housing benefits also account for 75 per cent or more of the average market rent in the least expensive rental market for all household types: 431 per cent for a single recipient with no dependent children, 307 per cent for a couple with no dependent children, 306 per cent for a single person with two dependent children, and 314 per cent for a couple with two dependent children.

## 5. Overview of key features

This section summarizes some of the key elements of social assistance and housing support programs across the selected international jurisdictions, and highlights a number of unique elements of the programs in each country, in order to adequately address the research questions set out in the Introduction.

Given the complexity of social assistance programs and the variations that exist across programs in different provinces and territories, several key features have been selected for comparison in this section:

- Whether or not any jurisdictions provide particularly high or particularly low rates. This was calculated as rates that are statistical outliers, or 1.5 times the interquartile range (the range within which 50 per cent of rates lie);
- Whether or not housing benefits exceeded the basic benefits provided to a social assistance recipient;
- Whether or not basic social assistance benefits are supplemented by distinct housing benefits;
- Whether or not there are regional variations in rate setting across the jurisdiction;
- Whether or not different social assistance housing benefits are provided for social housing and private housing;
- Whether or not total benefits approach minimum wage incomes (total benefits are 75 per cent or more of minimum wage income);
- Whether or not total benefits approach Low Income Measure (LIM) (total benefits are 75 per cent or more of LIM); and
- Whether or not housing benefits approach average market rents (housing benefits are 75 per cent or more of average market rent).

Checkmarks in the overview below indicate instances in which a particular feature is evident in a given jurisdiction. However, the absence of a checkmark does not necessarily indicate failure to meet criteria, since this may also indicate that data were unavailable or insufficient to indicate whether the criteria were met or not.

Table 11 Overview of key features

Jurisdiction	Outlier benefits	Housing benefits exceed basic benefits	Basic benefits + housing benefits	Regional variation in benefits	Different benefits for social housing and private housing	Total benefits approach minimum income wage	Total benefits approach LIM	Housing benefits approach average market rents
Australia			✓	✓				
Finland		✓	✓	✓			✓	✓
Ireland			✓	✓		✓	✓	✓
Netherlands			✓	✓		✓	✓	
United Kingdom		✓	✓	✓		✓	✓	✓
New York State		✓	✓	✓				

As illustrated in table 11 on the previous page, jurisdictions vary considerably in the design and delivery of their social assistance programs. While program rationale and recent developments in social assistance policy will be explored more fully in the synthesis report on both the Canadian and international review, we highlight several key features of each country below.

## Australia

Australia offers additional benefits for residents of remote communities, in order to increase employment in those areas, as well as to provide extra support to families with school-age children.

## Finland

Finland is one of three selected jurisdictions where housing benefits exceed basic benefits, for both a single recipient with no children (housing benefits are 105 per cent of basic benefits), and a couple with two dependent children (housing benefits are 112 per cent of basic benefits).

Finland also determines benefits at the municipal level, resulting in regional variations in eligibility criteria and generosity of benefits.

As mentioned earlier, Finland's benefits also meet adequacy measures explored in this paper, with total benefits accounting for 75 per cent or more of the LIM for a single person with no dependent children, and a single person with two dependent children. It was also one of only two selected jurisdictions, alongside the United Kingdom, where shelter benefits approached average market rent in the most expensive rental market in the country, with shelter benefits accounting for 80 per cent of housing costs for a couple with no dependent children. In the least expensive rental market in the country, shelter benefits exceeded average market rent for three household types (a single person with no dependent children, a couple with no dependent children, and a single person with two dependent children).

## Ireland

In Ireland, monthly housing allowance limits vary by community.

Ireland's social assistance benefits, along with those in the United Kingdom, were particularly generous when compared with all benchmarks. Ireland's total benefits accounted for 75 per cent or more of minimum wage for single adults with no children and couples with no dependent children, and exceeded minimum wage for single adults with two dependent children. Similarly, benefit rates accounted for 75 per cent or more of the LIM for three household types: single adults with no dependent children, couples with no dependent children, and single adults with two dependent children. Shelter rates for all household types also exceeded average market rent in the least expensive region in the country.

## Netherlands

Housing benefits in the Netherlands are calculated separately from social assistance benefits in the Netherlands. However, most households that receive social assistance have an income level sufficiently low as to qualify for housing benefits as well. In these cases, housing benefits are

calculated from the social assistance benefit or the gross unemployment benefit as reference for household income.

Also, while the Netherlands does not include regional variation in its rate determinations, municipalities administer the social assistance program, and do have some control over additional eligibility requirements.

Rates in the Netherlands also accounted for 75 per cent or more of both minimum wage income and low income measures for single recipients, both those without dependent children and those with two dependent children.

## United Kingdom

In the United Kingdom, housing benefits exceed basic benefits for all household types, with housing benefits accounting for two to four times the amount of basic benefits.

Additionally, while rates are set at the national level, some eligibility requirements vary, depending on where the person resides.

The United Kingdom's benefits, along with those in Ireland, were particularly generous when compared with all benchmarks. The United Kingdom's total benefits exceeded minimum wage income for single recipients with no children and single recipients with two dependent children. Similarly, benefit rates met or exceeded LIM for single recipients and couples with no dependent children, and for single recipients with two dependent children. Shelter rates also accounted for greater than 90 per cent of average market rents for both the most expensive rental markets in the country (a unique feature among the selected countries), and the least expensive rental markets in the country, for all household types.

## 6. Implications and next steps

While the implications of these diverse social assistance policies will be analyzed further in the upcoming synthesis report, several key points have emerged from this review of selected international jurisdictions:

- In the majority of jurisdictions, housing benefits comprise a distinct component of social assistance benefits;
- No jurisdictions reviewed made explicit distinctions between the benefits provided to social assistance recipients living in social housing versus those living in private market housing;
- Regional variations based on cost of living are commonly integrated into the determination of social assistance benefits;
- Three countries distinguished themselves with particularly generous rates when compared to adequacy benchmarks. Finland, Ireland and the United Kingdom all had rates that approached or exceeded Low Income Measures and average market rents in the least expensive rental markets in the country. In the most expensive rental markets in each jurisdiction, both Finland and the United Kingdom's shelter rates also approached average rental costs;
- The Netherlands also provided rates that approached or exceeded Low Income Measures;
- Ireland, the Netherlands and the United Kingdom also offered rates that approached or exceeded full-time minimum wage income.

These topics will be explored further in the final synthesis report, and contrasted with the results from the review of Canadian jurisdictions.



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## Appendix A: Detailed rate schedules

### Australia

Table 12 Detailed monthly special benefit rates, according to Newstart Allowance for Australia

Newstart Allowance	Special benefit rates (NSA; current as of July 2015)		
	Every two weeks (AUD)	Monthly (AUD)	Monthly (CAD)
Single, no children	\$519	\$1,125	\$924
Single, with children	\$562	\$1,217	\$1,000
Single, aged 60 or over, after 9 continuous months on payment	\$562	\$1,217	\$1,000
Couple	\$938	\$2,031	\$1,669
Single, principal carer of a dependent child (granted an exemption for foster caring/home schooling/distance education/large family)	\$725	\$1,572	\$1,291

Source: <http://www.humanservices.gov.au/customer/services/centrelink/newstart-allowance>

Notes: Although the amount of social benefit a person is determined on individual circumstances, the maximum amount allowed is usually the same as what a person would receive from Newstart Allowance or Youth Allowance (see below).

The Australian dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)



**Table 13 Detailed monthly special benefit rates, according to Youth Allowance for Australia**

Youth Allowance (YA)	Special benefit rates (YA; current as of July 2015)		
	Every two weeks (AUD)	Monthly (AUD)	Monthly (CAD)
Single, under 18, at home*	\$234	\$506	\$416
Single, under 18, away from home	\$427	\$925	\$760
Single, 18 and over, at home*	\$281	\$609	\$500
Single, 18 and over, away from home	\$427	\$925	\$760
Single, with dependent children	\$559	\$1,212	\$995
Single, principal carer of a dependent child ( <i>granted an exemption for foster caring/home schooling/distance education/large family</i> )	\$725	\$1,572	\$1,291
Partnered, no dependent children	\$854	\$1,849	\$1,519
Partnered, with children (each)	\$937	\$2,031	\$1,668

Source: <http://www.humanservices.gov.au/customer/services/centrelink/youth-allowance>

Note: The Australian dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 14 Detailed monthly rent assistance rates for a childless household, Australia (AUD)**

Family situation	Maximum payment		No payment if rent is less than		Maximum payment if rent exceeds	
	Every two weeks	Monthly	Every two weeks	Monthly	Every two weeks	Monthly
Single, with no children	\$128	\$278	\$114	\$247	\$285	\$618
Single, with no children, sharer	\$86	\$185	\$114	\$247	\$228	\$494
Couple, with no children	\$121	\$262	\$185	\$402	\$346	\$751
1 of a couple who are separated due to illness, with no children	\$128	\$278	\$114	\$247	\$285	\$618
1 of a couple who are temporarily separated, with no children	\$121	\$262	\$114	\$247	\$275	\$596

Source: Payment Rates for Rent Assistance, Accessed online at: <http://www.humanservices.gov.au/customer/enablers/centrelink/rent-assistance/payment-rates>

**Table 15 Detailed monthly rent assistance rates for a household with dependent children, Australia (AUD)**

Family situation	Maximum payment		No payment if rent is less than		Maximum payment if rent exceeds	
	Every two weeks	Monthly	Every two weeks	Monthly	Every two weeks	Monthly
Single, 1 or 2 children	\$151	\$326	\$150	\$325	\$351	\$760
Single, 3 or more children	\$170	\$369	\$150	\$325	\$377	\$817
Couple, 1 or 2 children	\$151	\$326	\$222	\$481	\$423	\$916
Couple, 3 or more children	\$170	\$369	\$222	\$481	\$449	\$973

Source: Payment Rates for Rent Assistance, Accessed online at: <http://www.humanservices.gov.au/customer/enablers/centrelink/rent-assistance/payment-rates>

Note: Clients with dependent children will usually get Rent Assistance with the Family Tax Benefit Part A.

**Table 16 Detailed monthly rent assistance rates for a childless household, Australia (CAD)**

Family situation	Maximum payment		No payment if rent is less than		Maximum payment if rent exceeds	
	Every two weeks	Monthly	Every two weeks	Monthly	Every two weeks	Monthly
Single, with no children	\$105	\$229	\$94	\$203	\$234	\$508
Single, with no children, sharer	\$70	\$152	\$94	\$203	\$187	\$406
Couple, with no children	\$99	\$215	\$152	\$330	\$285	\$617
1 of a couple who are separated due to illness, with no children	\$105	\$229	\$94	\$203	\$234	\$508
1 of a couple who are temporarily separated, with no children	\$99	\$215	\$94	\$203	\$226	\$490

Source: Payment Rates for Rent Assistance, Accessed online at: <http://www.humanservices.gov.au/customer/enablers/centrelink/rent-assistance/payment-rates>

Note: The Australian dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 17 Detailed monthly rent assistance rates for a household with dependent children, Australia (CAD)**

Family situation	Maximum payment		No payment if rent is less than		Maximum payment if rent exceeds	
	Every two weeks	Monthly	Every two weeks	Monthly	Every two weeks	Monthly
Single, 1 or 2 children	\$124	\$268	\$123	\$267	\$288	\$624
Single, 3 or more children	\$140	\$303	\$123	\$267	\$310	\$671
Couple, 1 or 2 children	\$124	\$268	\$182	\$395	\$347	\$753
Couple, 3 or more children	\$140	\$303	\$182	\$395	\$369	\$799

Source: Payment Rates for Rent Assistance, Accessed online at: <http://www.humanservices.gov.au/customer/enablers/centrelink/rent-assistance/payment-rates>

Notes: Clients with dependent children will usually get Rent Assistance with the Family Tax Benefit Part A.

The Australian dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

## Finland

**Table 18 Social assistance rates for Helsinki, basic amounts in EUR**

Family size	Rate (in EUR per month)	Allowance per child	Rate (in EUR per month)
Single	€485.50	Child over 18*	€354.42
Lone parent	€534.05	Child 10-17	€339.85
Couple (per person)	€412.68	Child under 10	€305.87

**Note:** Information is taken from the municipality of Helsinki and may not be consistent with rates in other Finnish municipalities.

**Source:** Social assistance in 2016, City of Helsinki. Accessed at: <http://www.hel.fi/static/sote/tiedotteet/asiakkaille/Toimeentulotuki-2016-eng.pdf>

**Table 19 Social assistance rates for Helsinki, basic amounts in EUR**

Family size	Rate (in CAD per month)	Allowance per child	Rate (in CAD per month)
Single	\$631.76	Child over 18*	\$461.19
Lone parent	\$694.94	Child 10-17	\$442.23
Couple (per person)	\$537.01	Child under 10	\$398.02

**Note:** The Euro was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 20 Maximum monthly allowable housing costs in 2016, in EUR**

Household size persons	Municipality in category I	Municipality in category II	Municipality in category III	Municipality in category IV
1	€508	€492	€411	€362
2	€735	€706	€600	€527
3	€937	€890	€761	€675
4	€1,095	€1,038	€901	€804
+ each additional person	€137	€130	€123	€118

Source: Maximum housing costs, Kela, Government of Finland. Accessed online at: [http://www.kela.fi/web/en/eligibility\\_maximium-housing-costs](http://www.kela.fi/web/en/eligibility_maximium-housing-costs)

**Table 21 Maximum monthly allowable housing costs in 2016, in CAD**

Household size persons	Municipality in category I	Municipality in category II	Municipality in category III	Municipality in category IV
1	\$661	\$640	\$535	\$471
2	\$956	\$919	\$781	\$686
3	\$1,219	\$1,158	\$990	\$878
4	\$1,425	\$1,351	\$1,172	\$1,046
+ each additional person	\$178	\$169	\$160	\$154

Notes: The Euro was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

- Municipalities in category I: Helsinki
- Municipalities in category II: Espoo, Kauniainen, Vantaa
- Municipalities in category III: Hyvinkää, Hämeenlinna, Joensuu, Jyväskylä, Järvenpää, Kajaani, Kerava, Kirkkonummi, Kouvola, Kuopio, Lahti, Lappeenranta, Lohja, Mikkeli, Nokia, Nurmijärvi, Oulu, Pori, Porvoo, Raisio, Riihimäki, Rovaniemi, Seinäjoki, Sipoo, Siuntio, Tampere, Turku, Tuusula, Vaasa and Vihti
- Municipalities in category IV: All other municipalities

## Ireland

Table 22 Detailed monthly jobseeker's allowance for Ireland

Claimant situation	Rates for new claimants as of January 15, 2014		
	Weekly allowance (EURO)	Monthly allowance (EURO)	Monthly allowance (CAD)
Maximum personal rate aged 26 or over	€188	€818	\$1,227
Maximum personal rate aged 25	€144	€626	\$940
Increase for qualified adult (25 or over)	€125	€543	\$815
Maximum rate for a claimant who is 18-24	€100	€435	\$653
Increase for qualified adult	€100	€435	\$653
Each qualified child (dependent, under 18)	€30	€130	\$195

Source: <http://www.welfare.ie/en/Pages/Jobseekers-supports.aspx>

Notes: Weekly allowances are rounded to remove decimals. Weekly allowances were converted to monthly totals, considering that there are 4.35 weeks to a month.

The Euro was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

For adults between 18 and 25, the reduced rate does not apply if they have dependent children, if they are transferring from disability to JA, or if there were getting a higher rate before January 15, 2014. Other conditions apply.

Table 23 Detailed maximum monthly rent limits for Ireland (Euro)

Monthly rent limits for Ireland (EURO, as of June 2013)							
County	Single shared	Couple shared	Single	Couple	1 child	2 children	3 children
Dublin – Fingal	€300	€350	€520	€700	€850	€900	€950
Dublin – Not Fingal	€350	€400	€520	€750	€950	€975	€1,000
Carlow	€230	€250	€375	€433	€520	€560	€590
Cavan	€160	€190	€325	€350	€400	€415	€433
Clare	€190	€210	€320	€350	€400	€450	€500
Cork	€250	€270	€485	€575	€700	€725	€750
Donegal	€175	€200	€300	€325	€350	€400	€450
Galway	€280	€300	€475	€540	€700	€725	€750
Kerry	€190	€220	€365	€390	€500	€520	€540
Kildare	€250	€300	€433	€500	€650	€700	€750
Kilkenny	€200	€230	€390	€430	€540	€565	€590
Laois	€200	€230	€340	€350	€450	€480	€520
Leitrim	€175	€195	€300	€325	€350	€375	€400
Limerick	€200	€240	€375	€400	€500	€550	€600
Longford	€160	€175	€290	€300	€325	€340	€350
Louth	€215	€250	€390	€400	€550	€575	€600
Mayo	€195	€215	€375	€390	€433	€465	€500
Meath	€200	€260	€390	€420	€550	€600	€650
Monaghan	€180	€190	€300	€350	€400	€433	€450
Offaly	€200	€220	€360	€400	€450	€475	€500
Roscommon	€200	€220	€300	€325	€400	€410	€425
Sligo	€195	€220	€400	€425	€520	€540	€550
Tipperary	€195	€220	€370	€400	€485	€500	€525
Waterford	€220	€240	€375	€390	€475	€500	€525
Westmeath	€190	€210	€390	€400	€500	€520	€530
Wexford	€250	€270	€375	€390	€500	€540	€575
Wicklow	€240	€290	€425	€450	€600	€610	€625
North Kildare	€270	€290	€500	€575	€750	€800	€850
Bray Area	€275	€300	€520	€680	€850	€925	€1,000

Source: Maximum Rent Limits for Rent Supplement – June 2013. Accessed online at:  
<http://www.welfare.ie/en/pressoffice/pdf/Revised%20rent%20limits%20June%202013.pdf>

Note: The lowest allowances are heighted in blue while the highest allowances are highlighted in red.

Table 24 Detailed maximum monthly rent limits for Ireland (CAD)

Monthly rent limits for Ireland (CAN, as of June 2013)							
County	Single shared	Couple shared	Single	Couple	1 child	2 children	3 children
Dublin – Fingal	\$450	\$525	\$780	\$1,050	\$1,275	\$1,350	\$1,425
Dublin – Not Fingal	\$525	\$600	\$780	\$1,125	\$1,425	\$1,463	\$1,500
Carlow	\$345	\$375	\$563	\$650	\$780	\$840	\$885
Cavan	\$240	\$285	\$488	\$525	\$600	\$623	\$650
Clare	\$285	\$315	\$480	\$525	\$600	\$675	\$750
Cork	\$375	\$405	\$728	\$863	\$1,050	\$1,088	\$1,125
Donegal	\$263	\$300	\$450	\$488	\$525	\$600	\$675
Galway	\$420	\$450	\$713	\$810	\$1,050	\$1,088	\$1,125
Kerry	\$285	\$330	\$548	\$585	\$750	\$780	\$810
Kildare	\$375	\$450	\$650	\$750	\$975	\$1,050	\$1,125
Kilkenny	\$300	\$345	\$585	\$645	\$810	\$848	\$885
Laois	\$300	\$345	\$510	\$525	\$675	\$720	\$780
Leitrim	\$263	\$293	\$450	\$488	\$525	\$563	\$600
Limerick	\$300	\$360	\$563	\$600	\$750	\$825	\$900
Longford	\$240	\$263	\$435	\$450	\$488	\$510	\$525
Louth	\$323	\$375	\$585	\$600	\$825	\$863	\$900
Mayo	\$293	\$323	\$563	\$585	\$650	\$698	\$750
Meath	\$300	\$390	\$585	\$630	\$825	\$900	\$975
Monaghan	\$270	\$285	\$450	\$525	\$600	\$650	\$675
Offaly	\$300	\$330	\$540	\$600	\$675	\$713	\$750
Roscommon	\$300	\$330	\$450	\$488	\$600	\$615	\$638
Sligo	\$293	\$330	\$600	\$638	\$780	\$810	\$825
Tipperary	\$293	\$330	\$555	\$600	\$728	\$750	\$788
Waterford	\$330	\$360	\$563	\$585	\$713	\$750	\$788
Westmeath	\$285	\$315	\$585	\$600	\$750	\$780	\$795
Wexford	\$375	\$405	\$563	\$585	\$750	\$810	\$863
Wicklow	\$360	\$435	\$638	\$675	\$900	\$915	\$938
North Kildare	\$405	\$435	\$750	\$863	\$1,125	\$1,200	\$1,275
Bray Area	\$413	\$450	\$780	\$1,020	\$1,275	\$1,388	\$1,500

Source: Maximum Rent Limits for Rent Supplement – June 2013. Accessed online at:  
<http://www.welfare.ie/en/pressoffice/pdf/Revised%20rent%20limits%20June%202013.pdf>

Notes: The lowest allowances are heighted in blue while the highest allowances are highlighted in red.

The Euro was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at:  
[https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)



## Netherlands

Table 25 Monthly social assistance benefit limit for the Netherlands, 2015

Household type	Benefit (EUR)	Holiday allowance (EUR)	Benefit (CAD)	Holiday allowance (CAD)
Single person, 18 to 20 years of age	€225.30	€11.86	\$340.20	\$17.91
Single person, 21 to AOW pension age	€912.79	€48.04	\$1,378.30	\$72.54
Single person, 21 to AOW pension age, with 1 co-resident	€651.99	€34.32	\$984.50	\$51.82
Single person, 21 to AOW pension age, with 2 co-residents	€565.06	€29.74	\$853.24	\$44.91
Single person, 21 to AOW pension age, with 3 co-residents	€521.60	€27.45	\$787.61	\$41.45
Couple, both partners 18 to 20 years of age, without children	€450.60	€23.72	\$680.40	\$35.82
Couple, both partners 18 to 20 years of age, with children	€711.40	€37.44	\$1,074.21	\$56.53
Family member under 21, without children	€877.30	€46.17	\$1,324.72	\$69.72
Family member under 21, with children	€1,138.09	€59.90	\$1,718.51	\$90.45
Couple, both partners 21 to AOW pension age	€1,303.99	€68.63	\$1,969.01	\$103.63
Couple, both partners 21 to AOW pension age, with 1 co-resident	€1,130.12	€59.48	\$1,706.47	\$89.81
Couple, both partners 21 to AOW pension age, with 2 co-residents	€1,043.20	€54.91	\$1,575.22	\$82.91
Couple, both partners 21 to AOW pension age, with 3 co-residents	€991.04	€52.16	\$1,496.46	\$78.76

Source: Dutch social assistance benefit, Sociale Verzekeringsbank (Social Insurance Bank)

[https://www.svb.nl/int/en/bbz/bijstand/bijstand\\_nederland/](https://www.svb.nl/int/en/bbz/bijstand/bijstand_nederland/)

Note: The Euro was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at:

[https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 26 Monthly Rent Allowance Calculation Limits for the Netherlands, 2016**

Limits	Rent Allowance Calculation Limits	
	Limits and thresholds (EUR)	Limits (CAD)
Base rent	€ 231.87	\$350.12
Quality Discount Limit	€ 409.92	\$618.98
Low Capping Limit	€ 586.68	\$885.88
High Capping Limit	€ 628.76	\$949.42
Housing Benefit Limit	€ 710.68	\$1,073.12

**Source:** Standards and Limits Rent Allowance, Woonbond, 2016. Accessed online: <https://www.woonbond.nl/beleid-belangen/huurtoeslag/normen-en-grenzen-huurtoeslag>

**Note:** The Euro was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

## United Kingdom

Table 27 Detailed monthly income support rates for the United Kingdom

Recipient status	Income support payments		
	Weekly payment (GBP)	Monthly payments (GBP)	Monthly payments (CAD)
<b>Single</b>			
16 to 24	£58	£252	\$449
25 or over	£73	£318	\$566
<b>Lone parent</b>			
16 to 17	£58	£252	\$449
18 or over	£73	£318	\$566
<b>Couples</b>			
Both under 18	£58	£252	\$449
Both under 18 - 'higher rate'	£88	£381	\$678
One under 18, the other 18 to 24	£58	£252	\$449
One under 18, the other 25 or over	£73	£318	\$566
One under 18, one over - 'higher rate'	£115	£500	\$890
Both 18 or over	£115	£500	\$890

Source: Income Support Information Page. Accessed online at: <https://www.gov.uk/income-support/what-youll-get>

Notes: The higher rate is available to couples where at least one member is responsible for a child and if both couples would be eligible for Employment and Support Allowance, Income Support, or Jobseeker's Allowance if they weren't a couple.

The British Pound Sterling was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 28 Detailed monthly income-based Jobseeker’s Allowance for the United Kingdom**

Recipient status	Income-based Jobseeker’s Allowance (current as of July 17, 2015)		
	JSA weekly amounts (GBP)	JSA monthly amounts (GBP)	JSA monthly amounts (CAD)
18 to 24	£58	£252	\$449
25 or over	£73	£318	\$566
Couples (both over 18)	£115	£500	\$890

Source: Income Support Information Page. Accessed online at: <https://www.gov.uk/income-support/what-youll-get>

Note: The British Pound Sterling was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 29 Detailed monthly basic standard allowance under Universal Credit payments**

Recipient status	Universal Credit (current as of September 20, 2016)	
	Basic Standard Allowance (GBP)	Basic Standard Allowance (CAD)
Single (under 25)	£252	\$449
Single (25 or over)	£318	\$566
In a couple (both under 25)	£395	\$703
In a couple (at least one over 25)	£500	\$890

Source: Universal Credit: What You’ll Get. Accessed online at: <https://www.gov.uk/universal-credit/what-youll-get>

Note: The British Pound Sterling was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 30 Extra monthly benefits for households with children under the Universal Credit payment**

Recipient status	Universal Credit (current as of September 20, 2016)	
	Extra monthly benefits (GBP)	Extra monthly benefits (CAD)
First child	£277	\$493
For every additional child (per child)	£232	\$412
Childcare (one child)	£646	\$1,151
Childcare (two or more children)	£1,108	\$1,972

Source: Universal Credit: What You'll Get. Accessed online at: <https://www.gov.uk/universal-credit/what-youll-get>

Note: The British Pound Sterling was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 31 Detailed monthly Housing Benefit for private renters in the United Kingdom**

Property	Housing Benefit (current as of July 17, 2015)		
	Weekly amount (GBP)	Monthly amount (GBP)	Monthly amount (CAD)
1 bedroom (or shared accommodation)	£261	£1,134	\$2,019
2 bedrooms	£302	£1,315	\$2,342
3 bedrooms	£354	£1,542	\$2,746
4 bedrooms	£417	£1,814	\$3,231

Source: Housing Benefit, What you'll get. Accessed online: <https://www.gov.uk/housing-benefit/what-youll-get>

Note: The amounts presented in the table above indicate the maximum allowance a household can receive to cover rental expenses in a private dwelling. Benefits to cover their council and social housing rent do not have a set amount and vary from case to case depending on a number of factors including household income, eligible rent, whether there is a spare bedroom (reduces the weekly allowance), and the circumstances of people living in the household (age, people with disabilities, etc.).

**Table 32 Detailed monthly Child Benefit for the United Kingdom**

Who the allowance is for	Child Benefit (current as of July 17, 2015)		
	Weekly rate (GBP)	Monthly rate (GBP)	Monthly rate (CAD)
Eldest or only child	£21	£90	\$160
Each additional child	£14	£60	\$106

Source: Claim Child Benefit, What you'll get. Accessed online: <https://www.gov.uk/child-benefit/what-youll-get>

## United States (New York State)

**Table 33** Statewide monthly grants and allowances, exclusive of home energy payments and supplemental home energy payments

Number of persons in household	Rates (current as of July 17, 2015)	
	Monthly rate (USD)	Monthly rate (CAD)
One	\$158	\$199
Two	\$252	\$318
Three	\$336	\$424
Four	\$433	\$546
Five	\$534	\$673
Six	\$617	\$778
Each additional person	\$85	\$107

**Source:** Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

**Note:** The US dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 34 Statewide monthly home energy payments**

Number of persons in household	Rates (current as of July 17, 2015)	
	Monthly rate (USD)	Monthly rate (CAD)
One	\$14	\$18
Two	\$23	\$28
Three	\$30	\$38
Four	\$39	\$49
Five	\$48	\$60
Six	\$55	\$70
Each additional person	\$8	\$9

**Source:** Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

**Note:** The US dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 35 Statewide monthly supplemental home energy payments**

Number of persons in household	Rates (current as of July 17, 2015)	
	Monthly rate (USD)	Monthly rate (CAD)
One	\$11	\$14
Two	\$17	\$21
Three	\$23	\$29
Four	\$30	\$38
Five	\$37	\$47
Six	\$42	\$53
Each additional person	\$5	\$6

**Source:** Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

**Note:** The US dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 36 Local agency maximum monthly shelter allowances with children (US Dollars)**

Social service district	Family size (USD)							
	1	2	3	4	5	6	7	8+
Albany	\$214	\$219	\$309	\$348	\$386	\$404	\$421	\$421
Allegany	\$190	\$220	\$273	\$308	\$342	\$358	\$373	\$373
Broome	\$218	\$252	\$290	\$317	\$353	\$368	\$384	\$403
Cattaraugus	\$186	\$208	\$269	\$303	\$337	\$352	\$367	\$367
Cayuga	\$201	\$208	\$290	\$326	\$363	\$380	\$396	\$396
Chautauqua	\$198	\$202	\$285	\$321	\$357	\$374	\$390	\$390
Chemung	\$197	\$228	\$283	\$319	\$355	\$371	\$387	\$387
Chenango	\$189	\$219	\$264	\$298	\$331	\$346	\$361	\$361
Clinton	\$191	\$195	\$275	\$310	\$345	\$360	\$376	\$376
Columbia	\$201	\$221	\$290	\$326	\$363	\$379	\$396	\$396
Cortland	\$199	\$231	\$281	\$317	\$352	\$368	\$384	\$384
Delaware	\$200	\$232	\$274	\$309	\$344	\$359	\$374	\$374
Dutchess	\$286	\$292	\$412	\$464	\$516	\$540	\$563	\$563
Erie	\$209	\$214	\$301	\$339	\$377	\$395	\$411	\$411
Essex	\$199	\$231	\$268	\$302	\$336	\$351	\$366	\$368
Franklin	\$180	\$191	\$259	\$292	\$325	\$339	\$354	\$354
Fulton	\$189	\$193	\$272	\$307	\$341	\$357	\$378	\$372
Genesee	\$204	\$234	\$294	\$332	\$369	\$386	\$402	\$402
Greene	\$197	\$229	\$281	\$317	\$352	\$368	\$384	\$384
Hamilton	\$185	\$189	\$267	\$301	\$335	\$350	\$365	\$365
Herkimer	\$190	\$200	\$275	\$309	\$344	\$359	\$375	\$375
Jefferson	\$200	\$232	\$276	\$311	\$346	\$362	\$377	\$377
Lewis	\$193	\$197	\$279	\$314	\$349	\$365	\$381	\$381
Livingston	\$213	\$217	\$307	\$346	\$384	\$402	\$419	\$419
Madison	\$210	\$231	\$304	\$342	\$380	\$397	\$414	\$414
Monroe	\$257	\$298	\$343	\$374	\$405	\$420	\$438	\$477
Montgomery	\$196	\$200	\$283	\$319	\$354	\$370	\$386	\$386
Nassau	\$308	\$334	\$445	\$501	\$558	\$583	\$608	\$608
New York City	\$277	\$283	\$400	\$450	\$501	\$524	\$546	\$546
Niagara	\$204	\$209	\$294	\$331	\$369	\$385	\$402	\$402
Oneida	\$199	\$207	\$287	\$323	\$359	\$375	\$391	\$391
Onondaga	\$210	\$235	\$303	\$341	\$379	\$397	\$413	\$413
Ontario	\$213	\$240	\$308	\$347	\$386	\$403	\$421	\$421
Orange	\$292	\$298	\$421	\$473	\$527	\$551	\$574	\$574
Orleans	\$209	\$234	\$302	\$340	\$378	\$395	\$412	\$412



Social service district	Family size (USD)							
	1	2	3	4	5	6	7	8+
Oswego	\$208	\$212	\$300	\$338	\$375	\$393	\$409	\$409
Otsego	\$200	\$232	\$280	\$315	\$350	\$366	\$382	\$382
Putnam	\$306	\$312	\$441	\$496	\$553	\$578	\$602	\$602
Rensselaer	\$205	\$210	\$296	\$334	\$371	\$388	\$405	\$405
Rockland	\$302	\$350	\$434	\$488	\$543	\$568	\$592	\$592
St. Lawrence	\$194	\$211	\$281	\$316	\$351	\$368	\$383	\$383
Saratoga	\$219	\$224	\$316	\$356	\$396	\$414	\$431	\$431
Schenectady	\$216	\$226	\$311	\$351	\$390	\$408	\$425	\$425
Schoharie	\$199	\$231	\$286	\$322	\$358	\$374	\$390	\$390
Schuyler	\$194	\$224	\$275	\$310	\$345	\$360	\$376	\$376
Seneca	\$204	\$237	\$288	\$324	\$360	\$376	\$392	\$392
Steuben	\$188	\$192	\$271	\$305	\$339	\$354	\$370	\$370
Suffolk	\$310	\$358	\$447	\$503	\$560	\$586	\$611	\$611
Sullivan	\$211	\$244	\$297	\$335	\$372	\$389	\$406	\$406
Tioga	\$201	\$233	\$285	\$321	\$357	\$373	\$390	\$390
Tompkins	\$219	\$251	\$317	\$357	\$396	\$414	\$432	\$432
Ulster	\$263	\$305	\$350	\$382	\$413	\$427	\$445	\$486
Warren	\$215	\$250	\$299	\$337	\$375	\$392	\$408	\$408
Washington	\$205	\$231	\$295	\$332	\$370	\$387	\$403	\$403
Wayne	\$209	\$240	\$302	\$340	\$378	\$395	\$412	\$412
Westchester	\$295	\$314	\$426	\$479	\$533	\$557	\$581	\$581
Wyoming	\$199	\$231	\$279	\$314	\$349	\$365	\$381	\$381
Yates	\$198	\$210	\$286	\$322	\$358	\$375	\$391	\$391

Source: Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

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**Table 37 Local agency maximum monthly shelter allowances with children (CAD)**

Social service district	Family size (CAD)							
	1	2	3	4	5	6	7	8+
Albany	\$270	\$276	\$390	\$439	\$487	\$510	\$531	\$531
Allegany	\$240	\$277	\$344	\$388	\$431	\$452	\$470	\$470
Broome	\$275	\$318	\$366	\$400	\$445	\$464	\$484	\$508
Cattaraugus	\$235	\$262	\$339	\$382	\$425	\$444	\$463	\$463
Cayuga	\$254	\$262	\$366	\$411	\$458	\$479	\$499	\$499
Chautauqua	\$250	\$255	\$359	\$405	\$450	\$472	\$492	\$492
Chemung	\$248	\$288	\$357	\$402	\$448	\$468	\$488	\$488
Chenango	\$238	\$276	\$333	\$376	\$417	\$436	\$455	\$455
Clinton	\$241	\$246	\$347	\$391	\$435	\$454	\$474	\$474
Columbia	\$254	\$279	\$366	\$411	\$458	\$478	\$499	\$499
Cortland	\$251	\$291	\$354	\$400	\$444	\$464	\$484	\$484
Delaware	\$252	\$293	\$346	\$390	\$434	\$453	\$472	\$472
Dutchess	\$361	\$368	\$520	\$585	\$651	\$681	\$710	\$710
Erie	\$264	\$270	\$380	\$428	\$475	\$498	\$518	\$518
Essex	\$251	\$291	\$338	\$381	\$424	\$443	\$462	\$464
Franklin	\$227	\$241	\$327	\$368	\$410	\$428	\$446	\$446
Fulton	\$238	\$243	\$343	\$387	\$430	\$450	\$477	\$469
Genesee	\$257	\$295	\$371	\$419	\$465	\$487	\$507	\$507
Greene	\$248	\$289	\$354	\$400	\$444	\$464	\$484	\$484
Hamilton	\$233	\$238	\$337	\$380	\$423	\$441	\$460	\$460
Herkimer	\$240	\$252	\$347	\$390	\$434	\$453	\$473	\$473
Jefferson	\$252	\$293	\$348	\$392	\$436	\$457	\$475	\$475
Lewis	\$243	\$248	\$352	\$396	\$440	\$460	\$481	\$481
Livingston	\$269	\$274	\$387	\$436	\$484	\$507	\$528	\$528
Madison	\$265	\$291	\$383	\$431	\$479	\$501	\$522	\$522
Monroe	\$324	\$376	\$433	\$472	\$511	\$530	\$552	\$602
Montgomery	\$247	\$252	\$357	\$402	\$446	\$467	\$487	\$487
Nassau	\$388	\$421	\$561	\$632	\$704	\$735	\$767	\$767
New York City	\$349	\$357	\$504	\$568	\$632	\$661	\$689	\$689
Niagara	\$257	\$264	\$371	\$417	\$465	\$486	\$507	\$507
Oneida	\$251	\$261	\$362	\$407	\$453	\$473	\$493	\$493
Onondaga	\$265	\$296	\$382	\$430	\$478	\$501	\$521	\$521
Ontario	\$269	\$303	\$388	\$438	\$487	\$508	\$531	\$531
Orange	\$368	\$376	\$531	\$597	\$665	\$695	\$724	\$724
Orleans	\$264	\$295	\$381	\$429	\$477	\$498	\$520	\$520

Social service district	Family size (CAD)							
	1	2	3	4	5	6	7	8+
Oswego	\$262	\$267	\$378	\$426	\$473	\$496	\$516	\$516
Otsego	\$252	\$293	\$353	\$397	\$441	\$462	\$482	\$482
Putnam	\$386	\$393	\$556	\$626	\$697	\$729	\$759	\$759
Rensselaer	\$259	\$265	\$373	\$421	\$468	\$489	\$511	\$511
Rockland	\$381	\$441	\$547	\$615	\$685	\$716	\$747	\$747
St. Lawrence	\$245	\$266	\$354	\$399	\$443	\$464	\$483	\$483
Saratoga	\$276	\$283	\$399	\$449	\$499	\$522	\$544	\$544
Schenectady	\$272	\$285	\$392	\$443	\$492	\$515	\$536	\$536
Schoharie	\$251	\$291	\$361	\$406	\$452	\$472	\$492	\$492
Schuyler	\$245	\$283	\$347	\$391	\$435	\$454	\$474	\$474
Seneca	\$257	\$299	\$363	\$409	\$454	\$474	\$494	\$494
Steuben	\$237	\$242	\$342	\$385	\$428	\$446	\$467	\$467
Suffolk	\$391	\$452	\$564	\$634	\$706	\$739	\$771	\$771
Sullivan	\$266	\$308	\$375	\$423	\$469	\$491	\$512	\$512
Tioga	\$254	\$294	\$359	\$405	\$450	\$470	\$492	\$492
Tompkins	\$276	\$317	\$400	\$450	\$499	\$522	\$545	\$545
Ulster	\$332	\$385	\$441	\$482	\$521	\$539	\$561	\$613
Warren	\$271	\$315	\$377	\$425	\$473	\$494	\$515	\$515
Washington	\$259	\$291	\$372	\$419	\$467	\$488	\$508	\$508
Wayne	\$264	\$303	\$381	\$429	\$477	\$498	\$520	\$520
Westchester	\$372	\$396	\$537	\$604	\$672	\$702	\$733	\$733
Wyoming	\$251	\$291	\$352	\$396	\$440	\$460	\$481	\$481
Yates	\$250	\$265	\$361	\$406	\$452	\$473	\$493	\$493

Source: Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

Note: The US dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 38 Local agency maximum monthly shelter allowances without children (US Dollars)**

Social service district	Family size (USD)							
	1	2	3	4	5	6	7	8+
Albany	\$184	\$213	\$245	\$267	\$289	\$299	\$311	\$341
Allegany	\$190	\$220	\$253	\$276	\$299	\$309	\$321	\$352
Broome	\$218	\$252	\$290	\$316	\$342	\$354	\$368	\$403
Cattaraugus	\$179	\$208	\$239	\$261	\$282	\$292	\$304	\$332
Cayuga	\$179	\$208	\$239	\$261	\$282	\$292	\$304	\$332
Chautauqua	\$167	\$194	\$223	\$243	\$263	\$272	\$283	\$310
Chemung	\$197	\$228	\$262	\$286	\$309	\$320	\$333	\$364
Chenango	\$189	\$219	\$252	\$275	\$297	\$307	\$320	\$350
Clinton	\$156	\$181	\$208	\$227	\$245	\$254	\$264	\$289
Columbia	\$191	\$221	\$254	\$277	\$300	\$310	\$323	\$353
Cortland	\$199	\$231	\$265	\$289	\$313	\$323	\$337	\$368
Delaware	\$200	\$232	\$267	\$292	\$315	\$326	\$339	\$371
Dutchess	\$216	\$251	\$288	\$314	\$340	\$351	\$366	\$400
Erie	\$169	\$201	\$215	\$234	\$254	\$262	\$273	\$299
Essex	\$199	\$231	\$265	\$289	\$313	\$323	\$337	\$368
Franklin	\$161	\$191	\$212	\$239	\$250	\$259	\$269	\$295
Fulton	\$159	\$184	\$212	\$231	\$250	\$259	\$269	\$295
Genesee	\$202	\$234	\$269	\$293	\$317	\$328	\$342	\$374
Greene	\$197	\$229	\$263	\$287	\$310	\$321	\$334	\$366
Hamilton	\$159	\$184	\$212	\$231	\$250	\$259	\$271	\$296
Herkimer	\$173	\$200	\$230	\$251	\$271	\$281	\$292	\$320
Jefferson	\$200	\$232	\$267	\$291	\$315	\$326	\$339	\$371
Lewis	\$152	\$177	\$203	\$221	\$240	\$248	\$258	\$282
Livingston	\$187	\$217	\$249	\$271	\$294	\$304	\$316	\$346
Madison	\$199	\$231	\$265	\$289	\$313	\$323	\$337	\$368
Monroe	\$257	\$298	\$343	\$374	\$405	\$418	\$436	\$477
Montgomery	\$158	\$184	\$211	\$230	\$249	\$257	\$268	\$293
Nassau	\$288	\$334	\$384	\$419	\$453	\$468	\$527	\$561
New York City	\$215	\$250	\$286	\$312	\$337	\$349	\$403	\$421
Niagara	\$174	\$202	\$232	\$253	\$274	\$283	\$295	\$322
Oneida	\$179	\$207	\$238	\$259	\$281	\$290	\$302	\$331
Onondaga	\$203	\$235	\$270	\$294	\$319	\$329	\$343	\$375
Ontario	\$207	\$240	\$276	\$301	\$326	\$337	\$351	\$384
Orange	\$229	\$265	\$305	\$332	\$360	\$372	\$387	\$424
Orleans	\$202	\$234	\$269	\$293	\$317	\$328	\$342	\$374

Social service district	Family size (USD)							
	1	2	3	4	5	6	7	8+
Oswego	\$183	\$212	\$244	\$266	\$288	\$298	\$310	\$339
Otsego	\$200	\$232	\$267	\$291	\$315	\$326	\$339	\$371
Putnam	\$237	\$275	\$316	\$344	\$373	\$386	\$401	\$439
Rensselaer	\$153	\$179	\$193	\$210	\$228	\$235	\$245	\$268
Rockland	\$302	\$350	\$402	\$438	\$474	\$490	\$511	\$559
St. Lawrence	\$182	\$211	\$242	\$264	\$286	\$295	\$307	\$336
Saratoga	\$185	\$215	\$247	\$269	\$291	\$301	\$314	\$343
Schenectady	\$195	\$226	\$260	\$283	\$307	\$317	\$330	\$361
Schoharie	\$199	\$231	\$265	\$289	\$313	\$323	\$337	\$368
Schuyler	\$194	\$224	\$258	\$281	\$304	\$315	\$328	\$359
Seneca	\$204	\$237	\$272	\$296	\$321	\$332	\$345	\$378
Steuben	\$159	\$184	\$212	\$231	\$250	\$259	\$269	\$295
Suffolk	\$309	\$358	\$412	\$449	\$486	\$503	\$523	\$573
Sullivan	\$211	\$244	\$281	\$306	\$332	\$343	\$357	\$391
Tioga	\$201	\$233	\$268	\$292	\$316	\$327	\$340	\$373
Tompkins	\$217	\$251	\$289	\$315	\$341	\$353	\$367	\$402
Ulster	\$263	\$305	\$350	\$382	\$413	\$427	\$445	\$486
Warren	\$215	\$250	\$287	\$313	\$339	\$350	\$364	\$399
Washington	\$199	\$231	\$265	\$289	\$313	\$323	\$337	\$368
Wayne	\$207	\$240	\$276	\$301	\$326	\$337	\$351	\$384
Westchester	\$271	\$314	\$361	\$393	\$426	\$440	\$474	\$536
Wyoming	\$199	\$231	\$265	\$289	\$313	\$323	\$337	\$368
Yates	\$181	\$210	\$241	\$263	\$284	\$294	\$306	\$335

**Source:** Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

**Note:** The US dollar was converted into Canadian dollars using OECD Purchasing Power Parity for GDP estimates. Available online at: [https://stats.oecd.org/Index.aspx?DataSetCode=SNA\\_TABLE4](https://stats.oecd.org/Index.aspx?DataSetCode=SNA_TABLE4)

**Table 39 Local agency maximum monthly shelter allowances without children (CAD)**

Social service district	Family size (CAD)							
	1	2	3	4	5	6	7	8+
Albany	\$232	\$269	\$309	\$337	\$364	\$377	\$392	\$430
Allegany	\$240	\$277	\$319	\$348	\$377	\$390	\$405	\$444
Broome	\$275	\$318	\$366	\$399	\$431	\$446	\$464	\$508
Cattaraugus	\$226	\$262	\$301	\$329	\$356	\$368	\$383	\$419
Cayuga	\$226	\$262	\$301	\$329	\$356	\$368	\$383	\$419
Chautauqua	\$211	\$245	\$281	\$306	\$332	\$343	\$357	\$391
Chemung	\$248	\$288	\$330	\$361	\$390	\$404	\$420	\$459
Chenango	\$238	\$276	\$318	\$347	\$375	\$387	\$404	\$441
Clinton	\$197	\$228	\$262	\$286	\$309	\$320	\$333	\$364
Columbia	\$241	\$279	\$320	\$349	\$378	\$391	\$407	\$445
Cortland	\$251	\$291	\$334	\$364	\$395	\$407	\$425	\$464
Delaware	\$252	\$293	\$337	\$368	\$397	\$411	\$428	\$468
Dutchess	\$272	\$317	\$363	\$396	\$429	\$443	\$462	\$504
Erie	\$213	\$254	\$271	\$295	\$320	\$330	\$344	\$377
Essex	\$251	\$291	\$334	\$364	\$395	\$407	\$425	\$464
Franklin	\$203	\$241	\$267	\$301	\$315	\$327	\$339	\$372
Fulton	\$201	\$232	\$267	\$291	\$315	\$327	\$339	\$372
Genesee	\$255	\$295	\$339	\$370	\$400	\$414	\$431	\$472
Greene	\$248	\$289	\$332	\$362	\$391	\$405	\$421	\$462
Hamilton	\$201	\$232	\$267	\$291	\$315	\$327	\$342	\$373
Herkimer	\$218	\$252	\$290	\$317	\$342	\$354	\$368	\$404
Jefferson	\$252	\$293	\$337	\$367	\$397	\$411	\$428	\$468
Lewis	\$192	\$223	\$256	\$279	\$303	\$313	\$325	\$356
Livingston	\$236	\$274	\$314	\$342	\$371	\$383	\$399	\$436
Madison	\$251	\$291	\$334	\$364	\$395	\$407	\$425	\$464
Monroe	\$324	\$376	\$433	\$472	\$511	\$527	\$550	\$602
Montgomery	\$199	\$232	\$266	\$290	\$314	\$324	\$338	\$370
Nassau	\$363	\$421	\$484	\$528	\$571	\$590	\$665	\$708
New York City	\$271	\$315	\$361	\$393	\$425	\$440	\$508	\$531
Niagara	\$219	\$255	\$293	\$319	\$346	\$357	\$372	\$406
Oneida	\$226	\$261	\$300	\$327	\$354	\$366	\$381	\$417
Onondaga	\$256	\$296	\$341	\$371	\$402	\$415	\$433	\$473
Ontario	\$261	\$303	\$348	\$380	\$411	\$425	\$443	\$484
Orange	\$289	\$334	\$385	\$419	\$454	\$469	\$488	\$535
Orleans	\$255	\$295	\$339	\$370	\$400	\$414	\$431	\$472

Social service district	Family size (CAD)							
	1	2	3	4	5	6	7	8+
Oswego	\$231	\$267	\$308	\$335	\$363	\$376	\$391	\$428
Otsego	\$252	\$293	\$337	\$367	\$397	\$411	\$428	\$468
Putnam	\$299	\$347	\$399	\$434	\$470	\$487	\$506	\$554
Rensselaer	\$193	\$226	\$243	\$265	\$288	\$296	\$309	\$338
Rockland	\$381	\$441	\$507	\$552	\$598	\$618	\$644	\$705
St. Lawrence	\$230	\$266	\$305	\$333	\$361	\$372	\$387	\$424
Saratoga	\$233	\$271	\$312	\$339	\$367	\$380	\$396	\$433
Schenectady	\$246	\$285	\$328	\$357	\$387	\$400	\$416	\$455
Schoharie	\$251	\$291	\$334	\$364	\$395	\$407	\$425	\$464
Schuyler	\$245	\$283	\$325	\$354	\$383	\$397	\$414	\$453
Seneca	\$257	\$299	\$343	\$373	\$405	\$419	\$435	\$477
Steuben	\$201	\$232	\$267	\$291	\$315	\$327	\$339	\$372
Suffolk	\$390	\$452	\$520	\$566	\$613	\$634	\$660	\$723
Sullivan	\$266	\$308	\$354	\$386	\$419	\$433	\$450	\$493
Tioga	\$254	\$294	\$338	\$368	\$399	\$412	\$429	\$470
Tompkins	\$274	\$317	\$364	\$397	\$430	\$445	\$463	\$507
Ulster	\$332	\$385	\$441	\$482	\$521	\$539	\$561	\$613
Warren	\$271	\$315	\$362	\$395	\$428	\$441	\$459	\$503
Washington	\$251	\$291	\$334	\$364	\$395	\$407	\$425	\$464
Wayne	\$261	\$303	\$348	\$380	\$411	\$425	\$443	\$484
Westchester	\$342	\$396	\$455	\$496	\$537	\$555	\$598	\$676
Wyoming	\$251	\$291	\$334	\$364	\$395	\$407	\$425	\$464
Yates	\$228	\$265	\$304	\$332	\$358	\$371	\$386	\$423

**Source:** Government of New York State. (2015). *New York State Plan and Executive Certification: Administration of the Block Grant for Temporary Assistance for Needy Families*. Office of Temporary and Disability Assistance. Accessed online: <https://otda.ny.gov/policy/tanf/TANF2015-State-Plan.pdf>

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