

March 24, 2025

Sent via email: Registry.Office@chrt-tcdp.gc.ca

Judy Dubois
Registry Operations
Canadian Human Rights Tribunal
240 Sparks Street, 6th Floor West
Ottawa, ON K1A 1J4

Dear Ms. Dubois,

RE: First Nations Child and Family Caring Society of Canada et al v Attorney General of Canada- T#1340/7008

The First Nations Child and Family Caring Society (the “**Caring Society**”) writes further to the Panel’s direction of February 10, 2025, and in response to Canada’s submission of March 17, 2025, regarding the long term reform phase of this human rights complaint. It has been over nine years since the Merits Decision and much has been accomplished. The Tribunal’s retention of jurisdiction remains essential, at this time, to ensuring that Canada’s discriminatory conduct is eradicated from child and family services and Jordan’s Principle and is not repeated for future generations.

First Nations-in-Assembly, the National Children’s Chiefs Commission (the “**NCCC**”), and the Caring Society are ready, along with the research regarding First Nations child and family services (“**FNCFS**”) and Jordan’s Principle, to build, through dialogue with Canada, an enduring end to Canada’s discriminatory conduct and ultimately resolve the complaint. Yet without Canada at the table, we cannot move forward. To this end, the Caring Society’s view on the issues raised by the Panel in its February 10, 2025 letter centres on requiring Canada to consult on long-term reform solutions that are grounded in the evidence, which is now ready, with the co-complaints, and with the NCCC. Canada’s suggestion that the Ontario Final Settlement Agreement form the basis for national long term reform of FNCFS is wholly inappropriate, given that many of the terms therein were considered and ultimately rejected by First Nations outside of Ontario.

1) First Nations and the National Children’s Chiefs Commission are Ready

In October 2024, First Nations-in-Assembly passed resolutions directing a reset of work towards long-term reform, including the establishment of the NCCC and the inclusion of the Caring Society in FNCFS and Jordan’s Principle negotiations and long-term reform. Since October 2024, the Caring Society has been working with technical experts across Canada to support the implementation of the direction of First Nations-in-Assembly, including collaboration with the NCCC when requested.

The First Nations-in-Assembly resolutions set out clear direction for FNCFS reform, guided by the NCCC, that is informed by evidence and protects First Nations children from discrimination now and forever. This is reflected in the correspondence from Chief Frost, the NCCC's Chair, to former Prime Minister Trudeau and Ministers Hajdu and Anandasangaree dated January 24, 2025 and follow-up correspondence to Prime Minister Carney on March 19, 2025. Through collective decision-making and affirmed resolutions, First Nation leaders have called for the development of a national umbrella agreement, with regional agreements that take full account of the distinct circumstances, cultures and the inherent rights of the children and the First Nations they belong to. First Nations-in-Assembly were clear in their expectations of a nation-to-nation relationship with the government of Canada and have repeatedly insisted on the importance of Canada fulfilling its obligations under the *United Nations Declaration of Indigenous People*, the honour of the Crown and asserting their right to Free, Prior and Informed Consent.

The Caring Society supports the approach set forth by the First Nations-in-Assembly and is confident that if (and when) Canada returns to the table in good faith, consistent with direction of the First Nations-in-Assembly, First Nations children, youth and families will be protected from discrimination now and into the future. Canada's refusal to continue consultations and meaningfully engage in the dialogic approach to end discrimination for all First Nations children evidences the need for the Tribunal to maintain its jurisdiction in this regard.

2) The Research is Ready

The Tribunal has consistently cautioned the Parties that it will not make orders absent strong and reliable evidence. In 2022 CHRT 41, the Tribunal stated that it will not make final orders in relation to long-term reform absent clear and cogent evidence supporting the options presented by the parties. As the Tribunal stated:

[503] The case is quite different with long-term reform where not all issues have been adjudicated by the Tribunal. The Tribunal supports First Nations-led solutions to eliminate discrimination if the evidence advanced proves to eliminate the systemic discrimination found in an effective and sustainable manner that responds to the specific needs of First Nations children, families and also communities. The Tribunal reminds the parties that it is a Tribunal created by statute with a mandate to eliminate discrimination in Canada once findings are made, **always based on evidence and not opinion**. The Tribunal is still seized of the matter and will need to make findings before ending its jurisdiction to ensure the racial and systemic discrimination is eliminated and does not reoccur. The First Nations parties' expertise is key in this important task.

[517] [...] Canada cannot contract out the Tribunal's quasi-constitutional responsibility to eliminate the discrimination found and prevent similar discriminatory practices from arising. It has to occur after an **evidence-based finding that satisfies the Tribunal** that discrimination is eliminated and prevented from reoccurring or on consent of all, not just some, parties in the Tribunal proceedings and **based on compelling evidence** that the systemic racial discrimination will be eliminated. [...] [Emphasis added]

In 2022 CHRT 8, the Tribunal granted the IFSD Jordan's Principle consent orders on the basis that the evidence and solutions to be identified in the research will support the long-term reform of Jordan's Principle, entrenching safeguards that will prevent the recurrence of discrimination:

[74] In her March 4, 2022, affidavit, Dr. Blackstock affirms that: [...]

41. Research to inform evidence-based long-term reform recommendations for Jordan's Principle will be critical to ensuring that Jordan's Principle is equitable, sustainable, accessible and that Canada is held accountable for the full and proper implementation of the Tribunal's orders. The Caring Society strongly believes such research must inform a longer-term funding approach for Jordan's Principle that embeds the Measuring to Thrive framework indicators for children, families, and communities to promote more holistic and seamless funding. We also see value in underpinning Jordan's Principle with the Spirit Bear Plan, given the large number of Jordan's Principle requests that relate to formal equality.

[75] Further:

42. IFSD has agreed to take on this Jordan's Principle research and, pursuant to this consent motion, Canada has agreed to fund it.

[76] The Panel agrees with the Caring Society and finds this is in line with the Panel's approach, findings and orders to eliminate systemic discrimination and prevent the same or similar discriminatory practices to emerge. Moreover, recently filed evidence in support of this motion substantiates Dr. Blackstock's assertions. **The Panel finds this order is necessary to achieve evidence-based meaningful and sustainable long-term reform informed by the real needs of children, youth and families. This is consistent with the Panel's orders to provide services according to the First Nations children's real needs.** [Emphasis added]

More recently, in 2025 CHRT 6, the Tribunal has underscored its expectations for evidence-informed long-term reform:

[237] The ultimate objective is to achieve sustainable long-term reform informed by the many studies, expert committees, First Nations, the parties, etc. for generations to come. The Tribunal has always hoped for a settlement

on long-term reform by way of consent order requests, if possible, similar to the compensation settlement agreement for both Jordan's Principle and the FNCFS Program. However, if this is not possible, the Tribunal can make systemic long-term orders informed by the parties to eliminate the systemic discrimination found. This is not optimal without the expert input of the parties including the First Nations Chiefs' knowledge and decisions expressed in the Chiefs-in-Assembly resolutions.

[238] The Tribunal consistently found that reform must reflect the specific different needs of First Nations and that they are best positioned to determine what this should look like in the long-term.

a) *FNCFS Research and Collaboration*

The Institute of Fiscal Studies and Democracy ("**IFSD**") has now completed its final phase of research in relation to FNCFS. In December 2018, IFSD's Phase 1 report, *Enabling First Nations Children to Thrive*, made eight recommendations for funding and structural changes to the FNCFS program, as well as three recommendations for further research. Following the acceptance of IFSD's report by the National Advisory Committee (the "**NAC**"), IFSD was asked to undertake further research to identify options and plans for a change in structure and resources in FNCFS to transition agencies to an outcome-based approach based on well-being for thriving First Nations children.

In July 2020, IFSD's Phase 2 report, *Funding First Nations child and family services (FNCFS): A Performance Budget Approach to Well-Being*, proposed a new funding mechanism for FNCFS as well as an updated framework on child, family, and community well-being, *Measuring to Thrive*.

On March 3, 2025, IFSD shared the pre-production draft and executive summary of the final Phase 3 report.¹ Phase 3 focuses on the delivery of well-being for First Nations, families, and children and builds on previous phases of work (Phases 1 and 2), setting out discrete First Nation-based delivery models that transform organizational strategy, people, process, and systems.

In order to safeguard small population First Nations from disadvantage arising from population driven funding levels, the Caring Society, without funding or support from Canada, has contracted Engage First to analyze the funding needs of five small population First Nations contemplating or in the process of exercising jurisdiction over child and family services. Through qualitative and quantitative analysis, the study seeks to illustrate an evidence-based cost structure for small population First Nations to deliver the continuum of child and family services. This study will include data gathering and analysis of current and future operations, including First Nations' jurisdiction and delivery of child and family services, delivery of prevention, protection, and post majority supports

¹ Interim update: First Nations child and family services (FNCFS) - Phase 3 https://ifsd.ca/wp-content/uploads/2025/03/2025-02-28_Pre-Production-Draft-1.pdf

and services, as well as First Nations' business functions, including governance, service delivery, corporate operations, financial management, and operating costs. A final report with independent and objective analysis is expected by March 31, 2025.

The Caring Society has also been working collaboratively with the NCCC to build a pathway for sustainable and durable long-term reform. As set out in the letter of January 24, 2025, from Chief Frost (attached as Exhibit H to the affidavit of Amber Potts, dated March 3, 2025) progress is being made by the NCCC to prepare for a full engagement on the long-term reform of both FNCFS and Jordan's Principle. Moreover, on March 19, 2025, the NCCC wrote to the new Prime Minister, the Right Honourable Mark Carney, who was sworn in as Prime Minister on March 14, 2025, setting out a pathway forward on long-term reform, and included specific and targeted solutions to improving the draft final settlement agreement that was presented to the First Nations-in-Assembly in July 2024.² The Caring Society is strongly of the view that change, progress and lasting long-term reform is possible if Canada returns to the table.

b) Jordan's Principle Research and Collaboration

The IFSD has been contracted by the Caring Society to undertake additional research on Jordan's Principle, pursuant to 2022 CHRT 8. The work undertaken by IFSD includes proposing options for the long-term sustainability of Jordan's Principle through the: (i) development of a policy framework (e.g., approach to measuring/monitoring outcomes for children, evaluating Jordan's Principle, etc.); (ii) review of existing programs and services; (iii) definition of options and considerations for reforming the operationalization of Jordan's Principle; and (iv) financial analysis and costing of the baseline and any proposed reforms.

On March 3, 2025, IFSD shared its interim briefing on Jordan's Principle: Considerations for the sustainability of Jordan's Principle.³ Their final report is anticipated in April 2025. This research will be critical to formulating a long-term approach to Jordan's Principle, particularly given IFSD's findings to date, which include:

- the current national administration of Jordan's Principle is untethered to the goal of substantive equality or the needs of children (p. 2);
- there is a need to reform data collection as the data gathered by ISC is "insufficient to demonstrate results for children or identify gaps in program areas" (p. 2);
- the largest share of all requests are for amounts below \$5,000, and almost half (45%) are for \$1,000 or less (p. 10); and

² March 19, 2025 letter from the NCCC to the Prime Minister, attached as Schedule "A".

³ Interim update: interim briefing: Considerations for the sustainability of Jordan's Principle, attached as Schedule "B".

- poor implementation of Jordan’s Principle is linked to administrative and operational considerations, requiring “clearer guidelines and tools” (p. 28).

IFSD has identified three clear considerations for improving the administration of Jordan’s Principle: (i) reform ISC’s intake process in a manner consistent with the goals of consistency and decency; (ii) invest in new technology; and (iii) focus on the First Nations child when gathering data. This research well-positions the Parties to begin their work on long-term reform for Jordan’s Principle.

The Parties have been intensively meeting in relation to the Jordan’s Principle mediation, in keeping with the direction of the Tribunal in 2025 CHRT 6. While the Caring Society is hopeful that an update will be provided to the Panel shortly, the Caring Society remains concerned that ISC has made little to no progress to remedy the service approval backlog to bring relief to children families who are waiting and has been unable to report on its reimbursement backlog, which is causing financial hardship to First Nations families and organizations that support them.

Although ISC unilaterally paused the meetings of the Jordan’s Principle Operations Committee (“**JPOC**”) after the Caring Society filed its non-compliance motion in December 2023, the committee has met four times in 2024 and 2025 (April 2024, May 2024, July 2024 and February 2025). Responding to a call from the Caring Society and other Parties, ISC has also planned for meetings throughout 2025. This development is welcomed by the Caring Society, with a view to ensuring that JPOC has the capacity to implement meaningful solutions as envisioned by the First Nations-in-Assembly’s resolutions.

The Caring Society (on February 13, 2025 and March 7, 2025) and the Assembly of First Nations (“**AFN**”) (on March 7, 2025) have also engaged directly with ISC regarding concerns about the information it shared in its Jordan’s Principle Operational Bulletin on February 10, 2025 and changes made to the ISC Jordan’s Principle website.⁴ During active mediation, ISC unilaterally issued the bulletin and further measures on its website without consulting the Caring Society or the Parties. Both the Operational Bulletin and the website are vague and confusing, purporting to introduce new restrictions on Jordan’s Principle that are not in keeping with the Tribunal’s orders while at the same time suggesting Canada will consider, without any details, substantive equality. Such changes include requiring requestors to provide, for all requests, detailed cost breakdowns, proof of gaps in services or substantive equality considerations, as well as personally intrusive information such as assessments, official diagnoses, and treatment plans. This approach places the burden of proving Canada’s discrimination back on the shoulders of its victims and is inconsistent with the Tribunal’s recent affirmation in 2025 CHRT 6 of the presumption of substantive equality. ISC has also removed Elders and traditional healing as examples of eligible supports and services available to First Nations children and has

⁴ Versions of the ISC Jordan’s Principle website as at January 16, 2025 and February 10, 2025 are attached as Schedule “C1” and “C-2”.

limited land-based activities and specialized programs based on cultural beliefs and practices to requests on-reserve only. The Operational Bulletin also appears to retroactively apply to requests that have not been processed, including those currently in the backlog. The Caring Society has raised concerns that this amounts to shifting goalposts, is procedurally unfair and risks further delaying or denying services to children. Both the Caring Society and the AFN have communicated their opposition to ISC's bulletin and website changes.

c) The Expert Advisory Committee

Pursuant to 2022 CHRT 8, the Expert Advisory Committee (the “**EAC**”) is comprised of highly respected and leading experts in various fields, including Indigenous knowledge and culture, as well as legal, public finance, historical and academic experts.

In their interim report,⁵ the EAC shared their frustration with the slow progress to date and highlighted the limitations of attempting to advance an independent forum for the EAC to complete their work. As a result of the differing positions on the role of the EAC, the EAC's terms of reference have not been approved by the AFN and Canada, and the EAC has not met with the Parties since April 2024.

Despite these challenges, the EAC remains deeply committed to supporting First Nations children and ensuring that discrimination does not recur:

We are a group of people deeply concerned about the well-being of First Nations children and families, and we want to help. We want our relationship with Canada and the other parties to be fruitful. We do not want to give up on the promise of this expert advisory committee, nor do we want the parties to give up on us (EAC interim report, pg. 12).

The Caring Society highly values the EAC's expertise and is confident that once the process of consultation is underway, the EAC will be an invaluable tool to ensure that Canada's discriminatory conduct within the government structure will not be repeated for First Nations children.

3) The Caring Society is Ready

The Caring Society remains deeply committed to giving effect to the Panel's orders and the First Nations-in-Assembly resolutions (i.e.: 40/2022, 60/2024, 61/2024, 88/2024, 89/2024, 90/2024) by working with the AFN Executive, the NCCC, First Nations technical experts and others. The Caring Society has repeatedly demonstrated its commitment to providing evidence-informed solutions in an accountable and transparent manner. The

⁵ Expert Advisory Committee for the Reform of Indigenous Services Canada Summary Report of Activities, Observations and Advice Spring 2022 to Spring 2024, <https://fncaringsociety.com/sites/default/files/2024-06/EAC%20Summary%20Report%20Spring%202022%20to%20Spring%202024.pdf>

Caring Society is currently actively engaging regional technical experts to analyze the evidence produced by the IFSD, the Expert Advisory Committee and will do so with respect to the forthcoming Engage First Report on small population First Nations. The Caring Society is also attending meetings of the NCCC when invited to share its views and positions.

The Caring Society shares the Panel's concerns regarding the delay in achieving long-term reform and recognizes that the Tribunal cannot indefinitely remain seized of this complaint. However, the Caring Society sees Canada's refusal to return to discussions with First Nations outside of Ontario and recent unilateral actions on Jordan's Principle, which appear to dramatically narrow the scope of the support Canada is willing to provide, as demonstrating that the progress since the Merits Decision is still not yet entrenched. As such, it is the Caring Society's position that a premature release of jurisdiction risks eroding the hard work undertaken over the last nine years, including from the lessons learned from First Nations outside of Ontario in their calls for a new approach to long term reform. The Caring Society remains ready to participate in meaningful consultations that achieve the ultimate goal of ending Canada's discriminatory conduct guided by the resolutions of First Nations in Assembly.

4) Path Forward for Long-Term Reform

Canada states in its March 17, 2025, submission that “**the Tribunal's analysis of the Ontario Final Agreement will inform the next steps on national reform.**” Such an approach ignores the direction of First Nations rights holders across the country and directly contradicts the express direction of First Nations-in-Assembly. Canada cannot impose this agreement, which was rejected by First Nations outside of Ontario, as the blueprint for long term reform for FNCFS when First Nations have clearly indicated that such an approach will not achieve the purpose of the agreement – namely to end discrimination and prevent it from happening again.

Moreover, it is important that Canada be effectively deterred from using the Ontario FSA as a template for national reform as it does not consider the needs of First Nations children, youth and families across the country. Given its importance to First Nations children in Ontario, the determination of the Ontario Final Agreement should not be rushed; however, national FNCFS long term reform must proceed simultaneously through a process of consultation. The proper use of this window, in keeping with the resolutions and guidance of the First Nations-in-Assembly, is for Canada to return to the table in good faith and develop long-term reform solutions that are evidence-informed and meet the real needs of First Nations children.

When the Tribunal ultimately rejected the compensation final settlement agreement in 2022 CHRT 41 (although finding that it substantially satisfied the Compensation Entitlement Order), there was widespread upset and concern that a resolution could not be achieved. That was not the case. Canada found a way to come back to the table, work with the parties, including the Caring Society, and align the compensation settlement

agreement with the Compensation Entitlement Order. Although long-term reform in both FNCFS and Jordan's Principle is more complex, the Parties have clear guidance from the Panel and the First Nations-in-Assembly to ensure we can achieve what the Tribunal has tasked us to accomplish. There is a way forward.

Much of the work needed to meet these milestones has been completed. With Canada at the table, the Caring Society is confident that long-term reform can be achieved. Even if there are some disagreements on certain aspects of reform, the dialogic approach has assisted the Parties in the past, as evidenced by the approach taken to the Compensation Framework Order and the Revised Final Settlement Agreement on compensation.

The Caring Society and the AFN Executive, supported by the NCCC, have a pathway for achieving long-term reform. Consultation regarding FNCFS and Jordan's Principle is essential to ensure First Nations children, youth and families benefit from a fulsome consultation process, bringing together the NCCC and First Nations, national and regional experts, the co-complaints and Canada in manner that upholds the principles of fairness and good faith negotiations and substantive equality.

The Caring Society submits that now is the time to move swiftly and effectively to implement the dialogic approach now that the research, the experts and the First Nations-in-Assembly have set the table for evidence-informed solutions for FNCFS and Jordan's Principle. First Nations and the NCCC is ready, the EAC is ready, the research is ready and so is the Caring Society. It is Canada that is the source of delay and requires encouragement from this Tribunal to make itself ready.

As the late Chair of the Truth and Reconciliation Commission, the Hon. Murray Sinclair, reminds us:

The road we travel is equal in importance to the destination we seek. There are no shortcuts. When it comes to truth and reconciliation we are forced to go the distance.

Yours truly and respectfully submitted,



Sarah Clarke

cc: Dayna Anderson, Paul Vickery, Kevin Staska, Sarah-Dawn Norris, Sarah Bird, Jon Khan, Meg Jones, Aman Owais (Counsel for Canada)

Adam Williamson (Counsel for the AFN)

Anshumala Juyal and Khizer Pervez (Counsel for the Commission)

Maggie Wentz, Jessie Stirling-Voss, Ashley Ash, Katelyn Johnstone
(Counsel for COO)

Justin Safayeni, Stephen Aylward, Taskeen Nawab
(Counsel for Amnesty International)

Julian Falconer, Meaghan Daniel (Counsel for Nishnawbe Aski Nation)

David Taylor, Logan Stack, Kiana Saint-Macary, Robin McLeod
(Counsel for the Caring Society)

March 19, 2025

Sent by e-mail

Right Honourable Mark Carney
Prime Minister of Canada
80 Wellington St.
Ottawa, ON K1A 0A2
E-mail: pm@pm.gc.ca

Dear Prime Minister,

I am writing on behalf of the National Children's Chiefs Commission (the Commission) to congratulate you on your victory in the Liberal Party leadership race and your appointment as Prime Minister. I want to take this opportunity to invite you to take immediate action to remedy Canada's discrimination against First Nations children before calling the next federal election.

The First Nations-in-Assembly created the Commission to lead long-term reform of First Nations child and family services (FNCFS) and Jordan's Principle. First Nations across Canada remain deeply committed to ending Canada's discrimination and are dedicated to achieving solutions that are in the best interests of First Nations children and families for generations to come.

The Canadian Human Rights Tribunal ordered Canada to immediately end its discrimination against First Nations children and families in 2016. Since then, First Nations and Canada have been working toward reform rooted in substantive equality and needs-based funding to support cultural continuity. Chiefs of Ontario, Nishnawbe Aski Nation and Canada recently announced a regional agreement to reform FNCFS. Canada now has the opportunity to work with the Commission to reach a national agreement that eliminates Canada's discrimination for all First Nations children. There are steps Canada can take to address immediate issues and create a pathway toward timely resolution of the remaining challenges:

1. Work collaboratively with the Commission and the First Nations Child & Family Caring Society (Caring Society) over the coming days to co-develop a letter of commitment that sets a framework for negotiating a national agreement—independent of the Ontario agreement—on long-term reform of FNCFS that fully eliminates the discrimination identified by the CHRT. Our previous correspondence on this matter is attached for your reference.
2. Work with the Commission and the Caring Society to co-develop urgent measures to meaningfully address the crisis in Canada's implementation of Jordan's Principle that is causing serious harms to First Nations children.

These are swift actions you can take to support First Nations children and families before the next federal election. I urge you to act now to prevent further harm to First Nations children and families and demonstrate your commitment to reconciliation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pauline Frost', with a stylized, cursive script.

Chief Pauline Frost

Chair, National Children's Chiefs Commission

Encl. Previous correspondence re. NCCC letter of commitment

c. National Children's Chiefs Commission

Assembly of First Nations Executive Committee

First Nations Child & Family Caring Society



Interim briefing: Considerations for the sustainability of Jordan's Principle

DRAFT - For discussion only

Institute of Fiscal Studies and Democracy

March 7, 2025

This analysis was produced by IFSD. IFSD's work is undertaken through a contract with the First Nations Child and Family Caring Society (Caring Society). The views and analysis do not necessarily reflect the views of the Caring Society.

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Executive Summary

Jordan's Principle (named for Jordan River Anderson) is meant to ensure First Nations children can access products, supports, and services for health, education, and social needs.

Jordan's Principle's current structure, funding, and accountability are concerning from a public finance perspective. Its administration and delivery are risks for its sustainability and the First Nations children it is intended to serve.

Data gathered by Indigenous Services Canada (ISC) is insufficient to demonstrate results for children or to identify gaps in related program areas. There is no way of knowing through ISC's information if Jordan's Principle is being administered and funded effectively to meet the needs of children. With undefined and insufficiently documented achievements, Jordan's Principle is vulnerable (as is any program) to adverse funding decisions.

Sustainability for Jordan's Principle means ensuring it can demonstrate results and value for First Nations children. This requires administrative clarity, appropriate funding, documented performance, and consistent delivery.

Recommendations for a path forward

- 1) Define and adopt an alternative structure to Jordan's Principle.
A legal rule, Jordan's Principle is reliant on administrative decisions for its operations. It merits the same structural parameters that exist for other demand-driven programs in Canada, such as Employment Insurance and Old Age Security. There are options to structure Jordan's Principle to ensure its sustainable operation and funding linked to the needs of First Nations children. See pages 14-15 and 19-24.
- 2) Transition to the reformed structure.
Once a reformed structure for Jordan's Principle is defined, adopt a two-track approach to its implementation. Track 1: adopt a new data gathering framework. Track 2: leverage the data in years 2 and 3 to inform parameters and funding for Jordan's Principle. See pages 24-28.
- 3) Build consensus among practitioners and the parties to clarify Jordan's Principle's policy statement and its implementation.
There are statements, guidelines, and rules associated to Jordan's Principle through ISC's website. Lacking, however, is a clear policy statement that guides and connects the structure, delivery, accountability, and funding of Jordan's Principle. The content of a policy statement will inform the rules to govern a restructured approach to Jordan's Principle, guiding scope and parameters of activity. See pages 15-18.

- 4) Define and implement a performance framework.
With all the information gathered on Jordan's Principle, we still do not know why children are seeking support and what happens to them following an intervention. With these gaps, there is no way of assessing progress toward formal or substantive equality through Jordan's Principle. To be sustainable, Jordan's Principle's performance must be measurable and its results evidenced. A national strategic performance framework for Jordan's Principle is an essential component of a sustainable approach to Jordan's Principle. See pages 24-34.
- 5) Define and implement a national data gathering framework, aligned to the spirit and intent of Jordan's Principle.
Data on Jordan's Principle should be gathered locally, consistently, and with decency. A consistent approach to gathering child-centred data means more relevant data that can be used to measure and monitor children's needs and identify gaps in existing programs and services. See pages 28-31.
- 6) Stabilize funding for a 2-to-3-year transition period.
A baseline and escalators are essential for estimating the costs of Jordan's Principle. Available information is insufficient to estimate a bottom-up cost based on defined factors. IFSD proposes estimating the cost of Jordan's Principle on an interim basis until such time that data capture is improved to inform access parameters and costs. See pages 36-42.
- 7) Maintain the Regional Working Group.
Support the Regional Working Group (as practitioners) to continue to convene to provide input and oversight on the reform and implementation of Jordan's Principle. The contributions of the Regional Working Group are reflected throughout this report.

Introduction

The Institute of Fiscal Studies and Democracy (IFSD) is providing an interim briefing ahead of the publication of its final report (anticipated for April 2025) on Jordan’s Principle.

IFSD gratefully recognizes the ongoing contributions of the Regional Working Group (technical experts and practitioners in the administration and delivery of Jordan’s Principle who were asked to convene to walk alongside IFSD as it undertakes its work), as well as other contributors.

The content of this interim briefing does not necessarily reflect the views of the Caring Society (the contract holder for this project), those of the Regional Working Group, or other contributors.

Jordan’s Principle is named in honour of Jordan River Anderson who died in a Winnipeg hospital, never having been in his family home because of a jurisdictional battle between the federal and provincial governments on who would pay for his homecare.

As a ‘child first’ principle rooted in substantive equality, Jordan’s Principle requires the government of first contact to consider and evaluate the needs of each individual child, including any needs stemming from their unique cultural background, historical disadvantage, and the lack of on-reserve or nearby services.

This research was ordered by the Canadian Human Rights Tribunal (CHRT) in 2022.¹

¹ In 2022 CHRT 8, Canada was ordered to (par. 172):

[...] fund the following research through the Institute for Fiscal Studies and Democracy (“IFSD”):

[...]

- d. upon completion of the Jordan’s Principle Data Assessment, the IFSD needs assessment regarding a long-term funding approach for Jordan’s Principle, including but not limited to identifying and addressing formal* equality gaps, in keeping with the Tribunal’s rulings, including but not limited to 2016 CHRT 2, 2017 CHRT 35, 2020 CHRT 20 and 2020 CHRT 36 (the “Jordan’s Principle Long Term Funding Approach Research”).

*** This order does not modify any substantive equality orders made by this Tribunal in this case.**

[...]

In response to the order, IFSD was mandated to propose options for the long-term sustainability of Jordan's Principle through the:

- 1) Development of a policy framework (e.g., approach to measuring/monitoring outcomes for children, evaluating Jordan's Principle, etc.);
- 2) Review of existing programs and services;
- 3) Definition of options and considerations for reforming the operationalization of Jordan's Principle;
- 4) Financial analysis and costing of the baseline and any proposed reforms.

To fulfil this mandate, IFSD has undertaken its work from a public finance perspective. This means considering the structure, funding, accountability, and delivery for a reformed and sustainable approach to Jordan's Principle. Sustainability for Jordan's Principle means ensuring it can demonstrate results and value for First Nations children. This requires administrative clarity, appropriate funding, documented performance, and consistent delivery.

During September 2024 hearings of the CHRT, panel member Edward Lustig emphasized the boundaries of the CHRT's role in pronouncing on administrative and operational matters in Jordan's Principle:

You know where that right point is to make the system work better and to avoid the calamity of someone who's dying not getting the service. We're not going to be able to tell you where that point is. We're only going to be able to tell you: Go off and try to find it yourselves.²

The statement reflects the limitations of the current operation of Jordan's Principle. Its administration has been problematic due to backlogs of requests, inconsistent application of rules across regions, etc. While Jordan's Principle is supporting the needs of First Nations children, the legal rule's national administration is untethered to the goal of substantive equality or the needs of children.

Jordan's Principle's current structure, funding, and accountability are concerning from a public finance perspective. Its administration and delivery are risks for its sustainability and the First Nations children it is intended to serve.

Data gathered by ISC is insufficient to demonstrate results for children or to identify gaps in related program areas. There is no way of knowing through ISC's information if Jordan's Principle is being administered and funded effectively to meet the needs of children. With undefined and insufficiently documented achievements, Jordan's Principle is vulnerable (as is any program) to adverse funding decisions.

² "Tribunal urges First Nations, feds to 'leave their conflicts aside' on Jordan's Principle issues," *CBC*, last updated September 2024, <https://www.cbc.ca/news/indigenous/jordans-principle-hearing-tribunal-1.7321710>.

As a legal rule, Jordan's Principle's operation is contingent on decisions by government. An administrative change can increase, decrease, or restrict access to Jordan's Principle. To manage the impact of these potential changes, the structure, funding, accountability, and delivery of Jordan's Principle should be linked with rules, incentives, and practices all aligned to its spirit and intent.

This interim briefing proceeds with a framework for the reform of Jordan's Principle with options for changes to structure, accountability, delivery, and funding.

IFSD makes the following observations:

- 1) **Structure:** A revised structure (law, rules, operating parameters) is required for Jordan's Principle. The structure should clarify its policy authority and connect to an accountability framework.
- 2) **Accountability:** A national strategic performance framework is required to ensure Jordan's Principle is meeting the needs of First Nations children. This should be undertaken by monitoring outcomes for children, as well as outcomes and funding for related program activity areas, e.g., as defined in the Spirit Bear Plan or similar approach.
- 3) **Delivery:** A relevant and consistent data gathering framework at intake is required to link requests to Jordan's Principle with the unique contexts of children, the root causes of their needs, and the limitations of existing services or programs. Such information is imperative for a sustainable and informed approach to Jordan's Principle: to understand how it interacts with other program areas and to quantify gaps.
- 4) **Funding:** A baseline should be defined for funding allocations with appropriate escalators; until such time that relevant data is gathered to redefine a baseline linked to the needs of First Nations children.

Context

Jordan's Principle is meant to “[resolve] jurisdictional disputes that impeded First Nations children from accessing government services,” to “[respond] to the unmet needs of First Nation children,” and to “[support] families in accessing products, services and supports for First Nations children and youth to help with a wide range of health, social and educational needs.”³

In responding to these needs, Jordan's Principle is to ensure substantive equality⁴ for First Nations children. In May 2017, the CHRT ruled that, under Jordan's Principle, the Government of Canada should provide services that “ensure substantive equality in the provision of services to the child, ...ensure culturally appropriate services to the child and/or...safeguard the best interests of the child.”⁵ According to ISC, “Jordan's Principle is intended to make sure that First Nations children have substantively equal access to government services, taking into account their distinct circumstances, experiences, and needs as First Nations children.”⁶

ISC's data gathering on Jordan's Principle does not align to the capture of jurisdictional disputes or substantive equality.

The national database for Jordan's Principle, “GCcase,” is maintained by ISC. The existing system was introduced in 2019, with data from previous fiscal years included based on availability. As part of its work, IFSD requested GCcase data to analyze trends in requests to Jordan's Principle. Based on its past report⁷, IFSD understood the limitations of the dataset in assessing substantive equality, as well as the resolution of jurisdictional or other service gaps for First Nations children. GCcase, however, is the

³ GC InfoBase, “Infographic for Jordan's Principle and the Inuit Child First Initiative,” *Government of Canada*, accessed February 19, 2025, <https://www.tbs-sct.canada.ca/ems-sgd/edb-bdd/index-eng.html#infographic/program/INDSC-BYP06/intro/>.

⁴ Multiple definitions of substantive equality exist. In essence, substantive equality requires consideration of differentiated circumstances to achieve equality. On its Jordan's Principle website, ISC defines substantive equality: “Substantive equality is a legal principle that refers to the achievement of true equality in outcomes. It is achieved through equal access, equal opportunity and, most importantly, the provision of services and benefits in a manner and according to standards that meet any unique needs and circumstances, such as cultural, social, economic and historical disadvantage. [...]” Indigenous Services Canada, “Jordan's Principle: Substantive equality principles,” last updated November 21, 2019, <https://www.sac-isc.gc.ca/eng/1583698429175/1583698455266#chp2>. For a discussion of substantive equality in reference to Jordan's Principle, see also, Institute of Fiscal Studies and Democracy (IFSD), “Data assessment and framing of an analysis of substantive equality through the application of Jordan's Principle,” September 2022, <https://ifsd.ca/wp-content/uploads/2024/06/ifsd-report-2022-09-data-assessment-and-framing-analysis-of-substantive-equality-through-the-application-of-jordans-principle.pdf>.

⁵ Canadian Human Rights Tribunal, *First Nations Child & Family Caring Society of Canada et al. v. Attorney General of Canada (representing the Minister of Indigenous and Northern Affairs Canada)*, par. 134 (iv), <https://decisions.chrt-tcdp.gc.ca/chrt-tcdp/decisions/en/item/232587/index.do>

⁶ Indigenous Services Canada, “Jordan's Principle,” *Government of Canada*, last updated March 3, 2025, <https://www.sac-isc.gc.ca/eng/1568396042341/1568396159824>.

⁷ Institute of Fiscal Studies and Democracy (IFSD), “Data assessment and framing of an analysis of substantive equality through the application of Jordan's Principle,” September 2022, <https://ifsd.ca/wp-content/uploads/2024/06/ifsd-report-2022-09-data-assessment-and-framing-analysis-of-substantive-equality-through-the-application-of-jordans-principle.pdf>.

only available source of request data on Jordan's Principle and is used to assess trends (with noted limitations).

On April 20, 2023, IFSD submitted a letter requesting Jordan's Principle data from GCcase. On January 9, 2024 (9 months after the initial request was submitted), IFSD received the data from ISC. This caused delays to overall project timelines. Throughout the analysis process, IFSD submitted questions to ISC and benefitted from the perspective of the GCcase technical team. While technical questions were answered by the team, other questions directed to the non-technical team, e.g., related to expenditures, operational practices, etc., received insufficient responses or remain outstanding.⁸

The subset of GCcase data obtained by IFSD does not contain all available information but several variables, some of which are aggregated to protect privacy. For instance, in the data provided to IFSD, there is no information on the context of the child making a request to Jordan's Principle, such as geographic location. Other variables such as the age of the child and the cost (requested and approved or denied) are presented as ranges, i.e., no specific values are provided. This means analysis of GCcase data is limited to describing requests and associated characteristics.

GCcase data records requests that individuals and groups made for funding from Jordan's Principle. Each request refers to one, single item that an individual or a group is requesting. One child can be associated to multiple requests and one request can be associated to multiple children.

There are four different lenses IFSD uses when analyzing GCcase data:

- 1) Number of children
- 2) Number of requests
- 3) Products, Services, and Supports (PSS)
- 4) Row count

⁸ As a recent example, in January 2025, IFSD requested Jordan's Principle expenditures by region from ISC. ISC responded, indicating they did not have the resources to provide such granular information to IFSD. However, in a January 10, 2025, letter to the CHRT, ISC provided regional breakdowns of expenditures (for contribution approaches) for Jordan's Principle. IFSD again followed-up with ISC given the similarities of its request and the published data, and no response was provided.

Table 1

Measure	Description	Considerations
Number of requests	<ul style="list-style-type: none"> The items people request from Jordan’s Principle. This approach counts each item once even if it is associated with multiple children. 	<ul style="list-style-type: none"> No count of individual children. Limited alignment to administrative practice, i.e., clusters instances of requests.
Number of children	<ul style="list-style-type: none"> The children associated to requests, when defined. This approach counts each child once even if they are associated with multiple requests. 	<ul style="list-style-type: none"> Not defined for all group requests.
Products, Services, and Supports (PSS)	<ul style="list-style-type: none"> Estimated number of instances of children requesting support through Jordan’s Principle. 	<ul style="list-style-type: none"> Risks overestimating the impact/reach of Jordan’s Principle (by using an estimated number of children who benefit from a group request without actual numbers).
Row count	<ul style="list-style-type: none"> Defined number of instances of children requesting support through Jordan’s Principle. 	<ul style="list-style-type: none"> Risks underestimating the impact/reach of Jordan’s Principle (by assuming only one child benefits from group requests that do not define the number of associated children).

GCcase data includes only requests with a decision. This means unopened requests or those in a backlog are not included in the dataset. The data to which IFSD has access is for the period 2017-18 to 2022-23 with different variables and varying completeness across fiscal years. Variables are increasingly consistent, complete, and broader in scope from fiscal year 2020-21 onwards. However, given the dataset to which IFSD has access terminates in fiscal year 2022-23, the impact of guidelines and decisions after that date, as well as the inclusion of unopened/backlogged requests may impact the trends observed.

ISC has made several changes to the operation of Jordan’s Principle. For instance, on February 10, 2025, ISC announced a series of new measures regarding the implementation of Jordan’s Principle.

Going forward, all requests must show “how the requested product, service or support meets the distinct needs of the First Nation child” and that the child either “experienced gaps or delays in accessing government services” or “was denied an existing government service because of their identity as a First Nations child.”⁹

⁹ Indigenous Services Canada, “Jordan’s Principle Operational Bulletin,” *Government of Canada*, last updated February 10, 2025, <https://www.canada.ca/en/indigenous-services-canada/news/2025/02/statement-by-minister-hajdu-on-the-changes-to-operating-procedures-related-to-processing-requests-under-jordans-principle.html>.

In addition, these new measures:

- Restrict certain types of requests unless necessary for substantive equality.
 - This includes certain “school-related requests.” ISC specified they will now re-direct requests from off-reserve school boards and private schools to other federal or provincial programs.
- Require requesters to provide a professional letter of support to demonstrate need.
- Introduce additional requirements for group requests (e.g., all group requests must list each child associated with the request with supporting documentation from a professional).¹⁰

The limitations of GCcase mean that the data cannot assess substantive equality or whether needs from jurisdictional or other service gaps are met.

The gaps in information from GCcase include:

- No information on *why* a child is seeking support from Jordan’s Principle. The root cause of the request, e.g., insufficient funds, refusal from existing federal program, lack of service availability, etc., is not defined. This information is necessary for assessing substantive equality and service gaps.
- No information on the child’s context. Such information would include considerations on geography, e.g., road access, states of emergency, service availability, etc.
- No data on outcomes for children who received support through Jordan’s Principle, i.e., how the child is doing post intervention.

Summative observations of GCcase data (for available data up to fiscal year 2022-23):

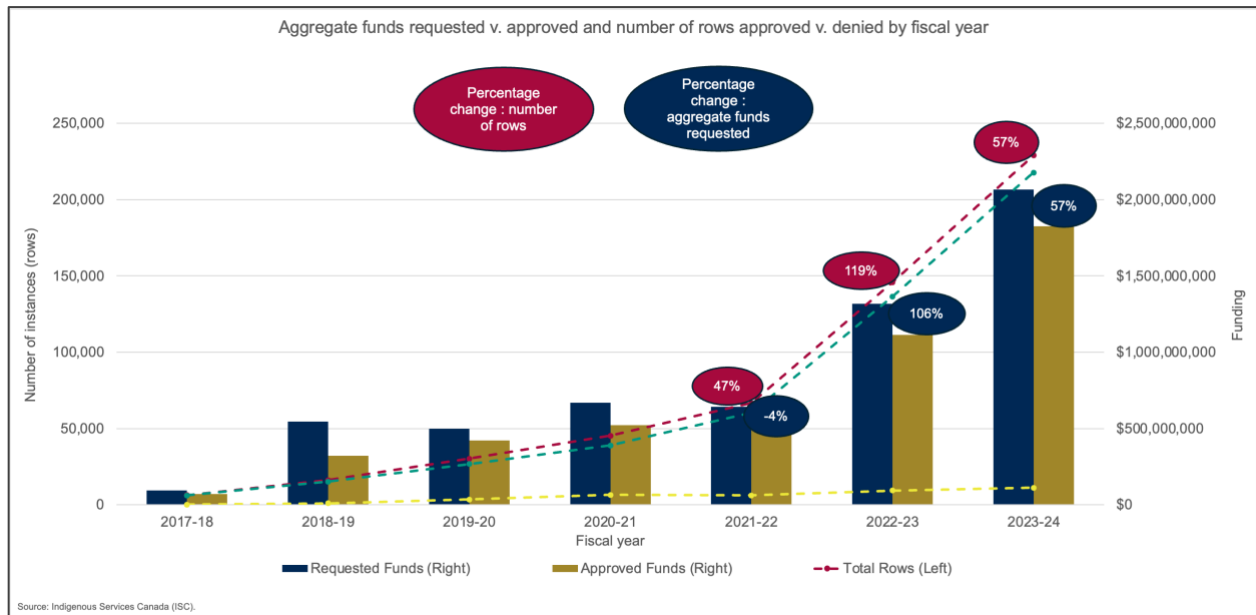
- 1) Instances of requests (i.e., row count) to Jordan’s Principle have increased across fiscal years, most significantly from 2021-22 to 2022-23 (a 119% percentage increase). Expenditures have also increased across fiscal years.
- 2) Most requests across fiscal years are approved.
- 3) Most requests are for individuals.
- 4) Most requests are for amounts less than \$5,000. However, most group requests are for amounts greater than \$5,000.
- 5) Little is known about the number of children associated to group requests.
- 6) From 2018-19 to 2021-22, most individual requests were for children residing on-reserve. The trend changed in 2022-23, with most requests for children residing off-reserve.
- 7) In fiscal year 2022-23, on-reserve, requests were associated mainly to medical travel, education, and economic supports. Off-reserve, requests were associated to economic supports and education.
- 8) Since 2020-21, Manitoba and Ontario have the largest shares of requests.

¹⁰ Indigenous Services Canada, “Jordan’s Principle Operational Bulletin.”

For additional GCcase and analysis of aggregate expenditures on Jordan’s Principle, see IFSD’s project updates.

Expenditures (requested and approved) and instances of requests (approved and denied) have increased across fiscal years, and most significantly from fiscal year 2021-22. In fiscal year 2023-24, Jordan’s Principle expenditures reached approximately \$1.8B (Figure 1).

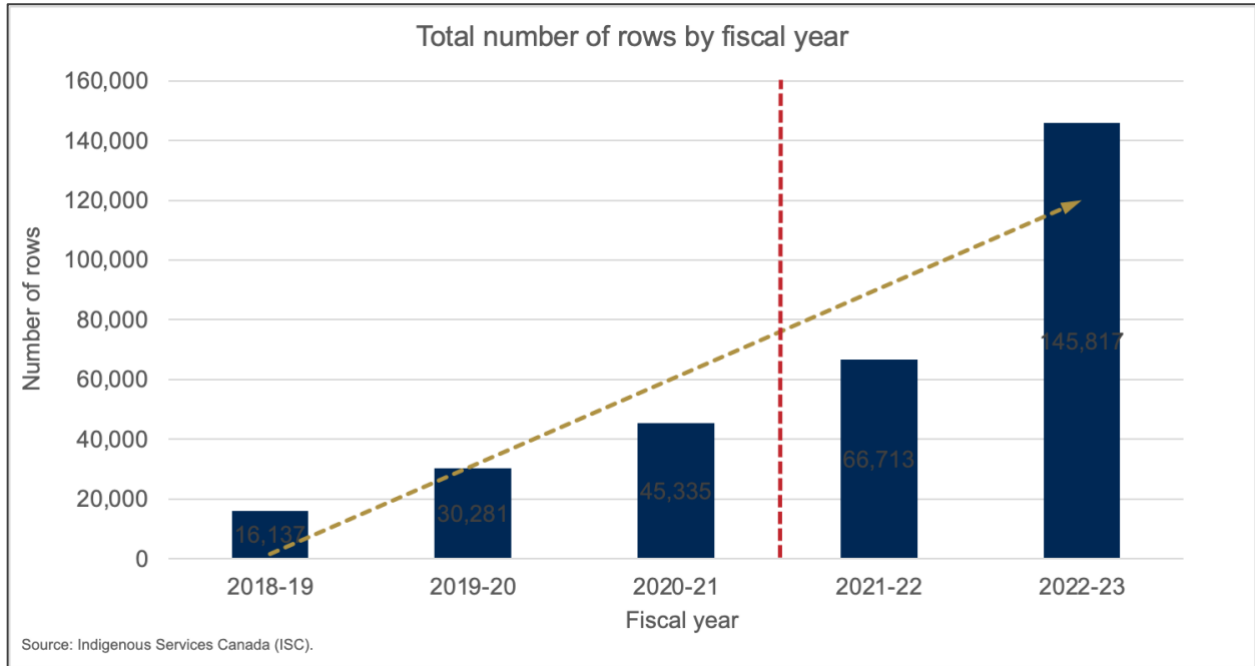
Figure 1



There was a significant growth in requests between FY 2021-22 and 2022-23 (119% percentage increase) (Figure 2). Back to Basics¹¹ was introduced in 2022. IFSD cannot verify if/how the implementation of Back to Basics in 2022 impacted the increase in number of requests. The data is untethered to ISC’s administration, i.e., rules, evaluation, and public understanding of Jordan’s Principle.

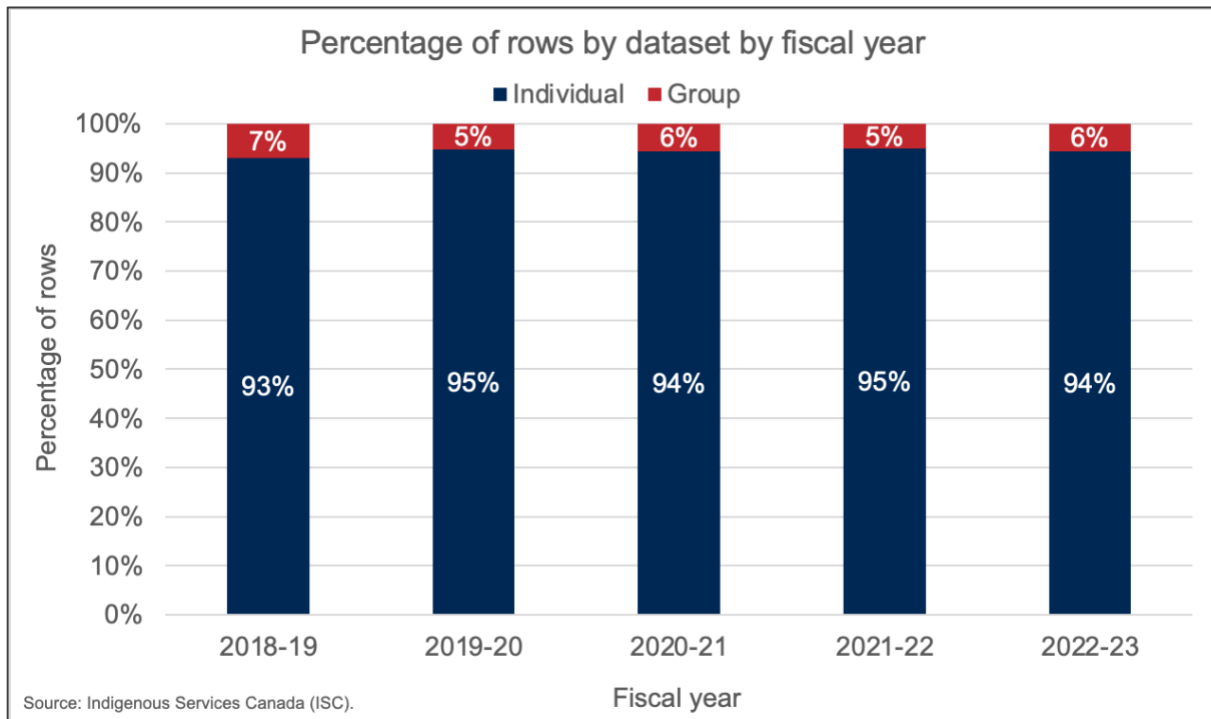
¹¹ Back to Basics is an approach evaluating requests to Jordan’s Principle implemented by ISC in 2022. According to ISC, Back to Basics “placed the focus on ensuring First Nations and Inuit families have simple and timely access to the services and supports aimed at improving the well-being and healthy development of their children” (Indigenous Services Canada, “Departmental Results Report 2022-23,” *Government of Canada*, 2023, https://publications.gc.ca/collections/collection_2023/sac-isc/R1-110-2023-eng.pdf, p. 19), and ensures Jordan’s Principle is implemented in a manner that is non-discriminatory, centers the needs and best interests of the child, is simple to access, timely, and minimizes the administrative burden on families.” (Indigenous Services Canada, “2023-24 United Nations 2030 Agenda and the Sustainable Development Goals,” *Government of Canada*, last updated March 9, 2023, <https://www.isc.gc.ca/eng/1666291904593/1666291923094>).

Figure 2



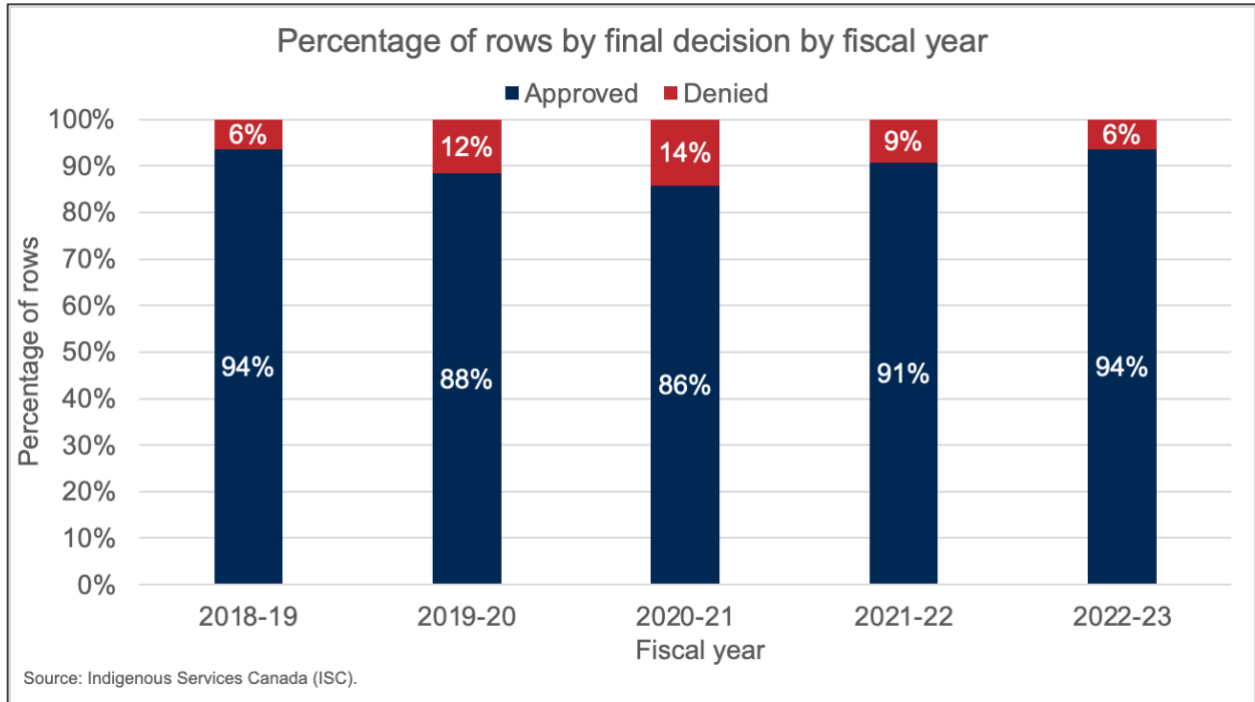
The majority (over 90%) of instances of requests are for individuals across fiscal years (Figure 3).

Figure 3



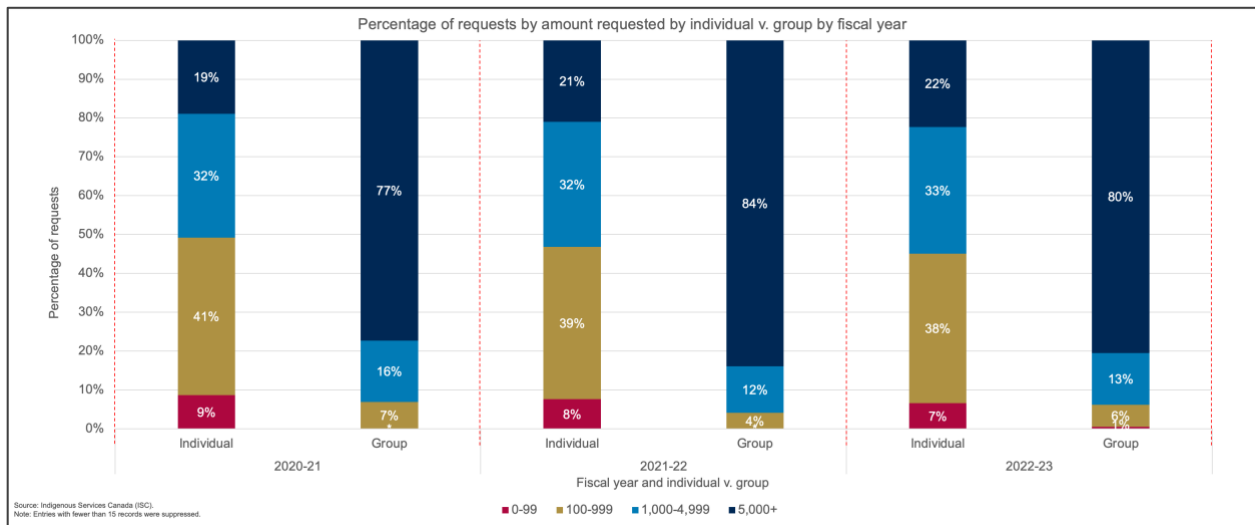
Across fiscal years, most instances of requests are approved (Figure 4).

Figure 4



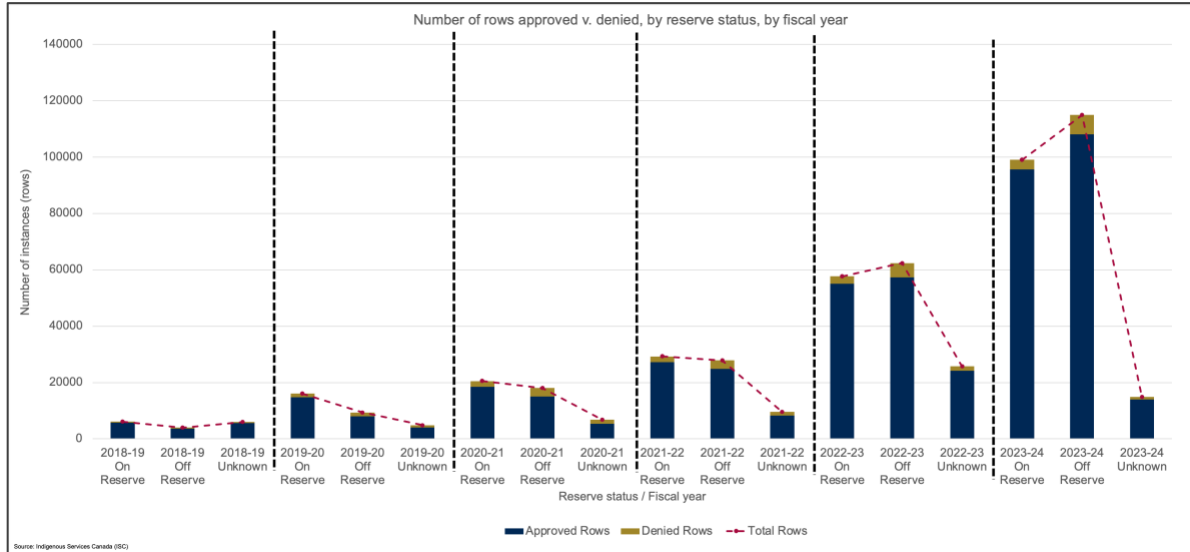
The largest shares of all requests are for amounts below \$5,000. However, group requests across fiscal years are mostly for amounts above \$5,000 (Figure 5).

Figure 5



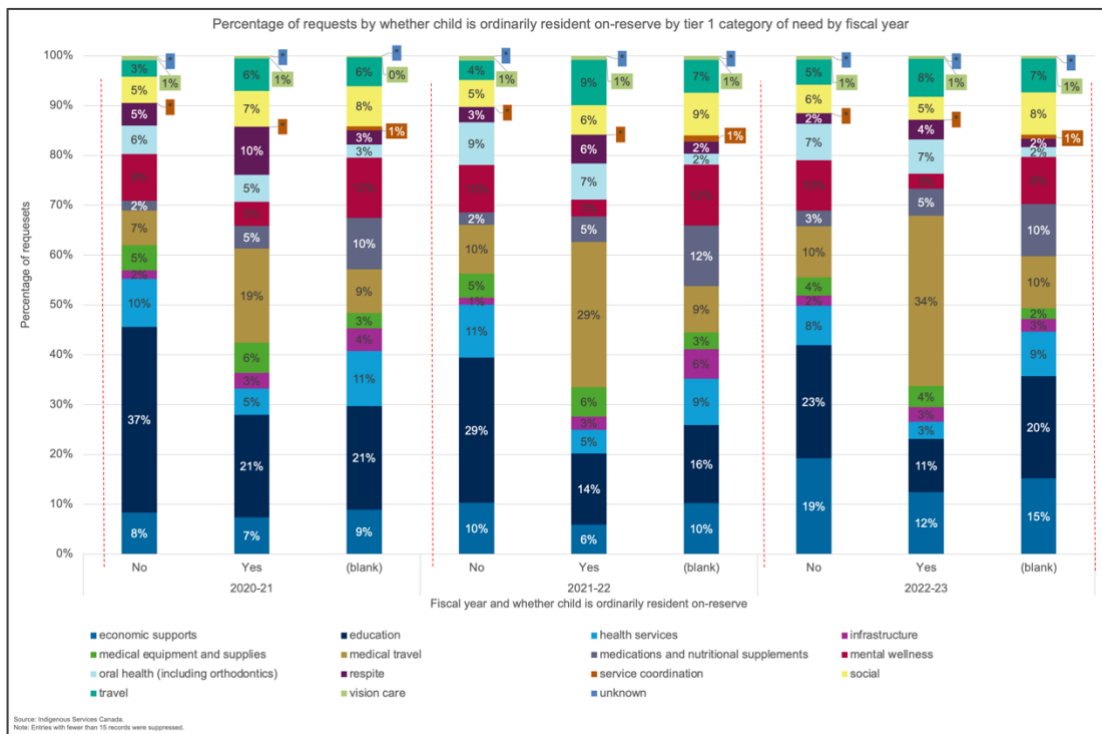
From 2018-19 and 2021-22, the total instances of requests were greater on-reserve than off-reserve. The trend shifted in 2022-23, in which total instances of off-reserve requests were greater (Figure 6).

Figure 6



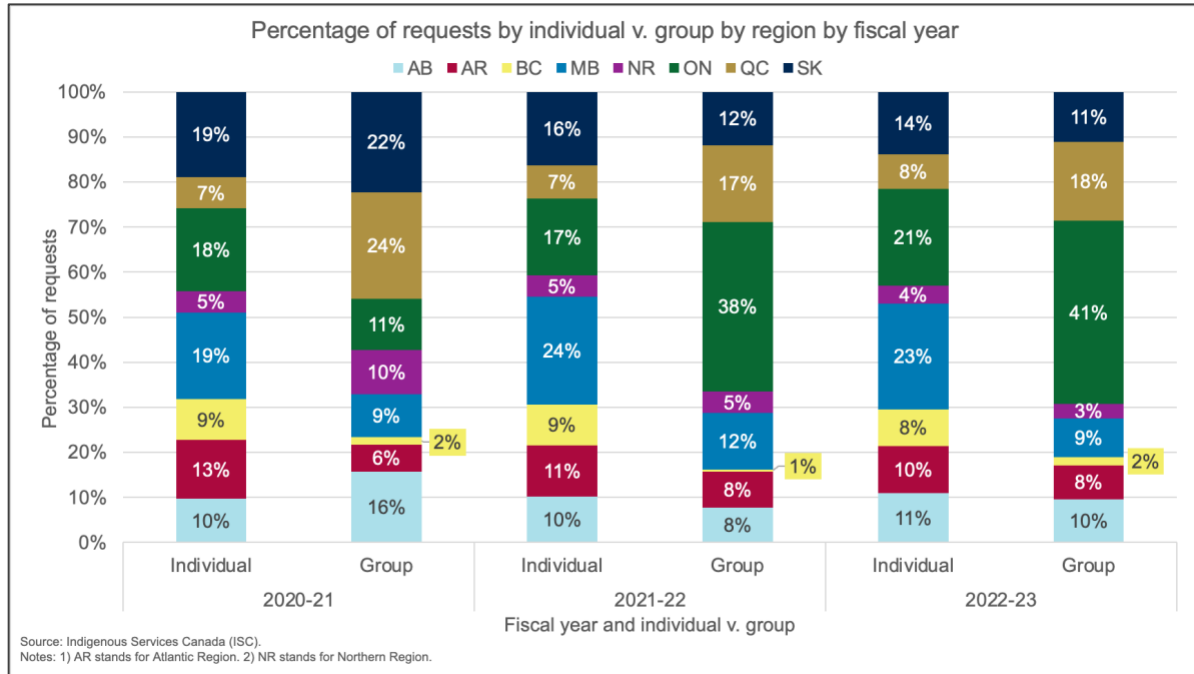
In fiscal year 2022-23, most requests on-reserve were related to medical travel. Off-reserve, requests were associated to education and economic supports (Figure 7).

Figure 7



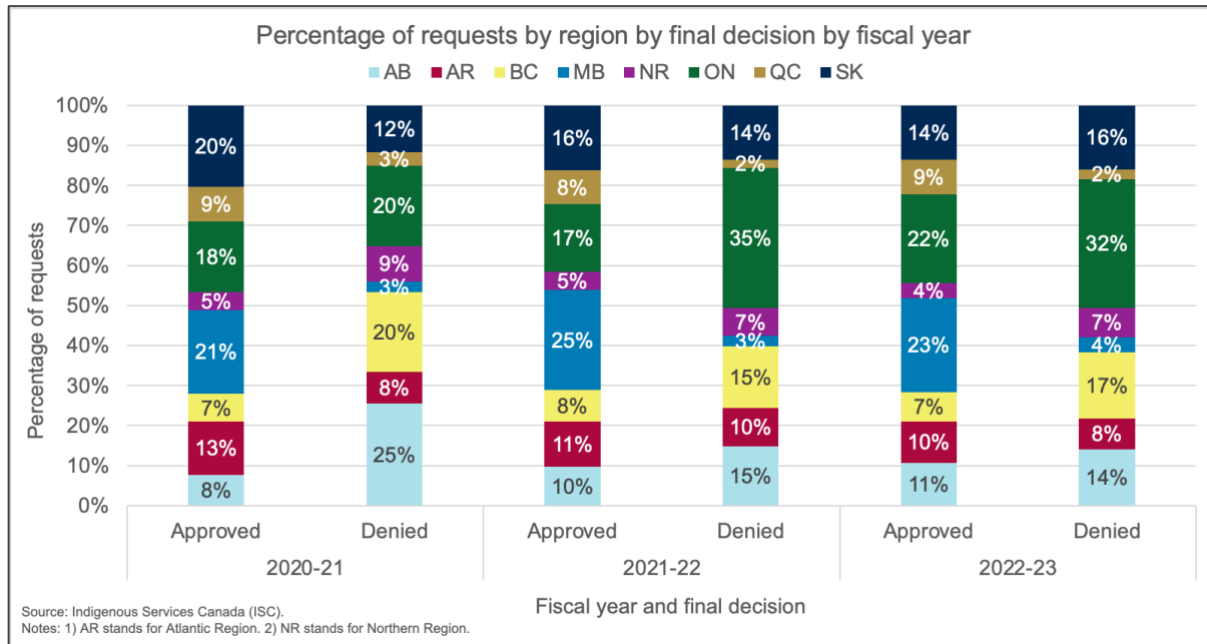
The largest shares of requests in fiscal years 2021-22 and 2022-23 are from Ontario and Manitoba (Figure 8). In fiscal year 2022-23, Ontario had the largest share of group requests and Manitoba the largest share of individual requests.

Figure 8



The largest shares of approved requests are from Manitoba and Ontario in fiscal year 2022-23. Ontario had the largest share of denied requests in fiscal year 2022-23.

Figure 9



The increased volume of requests and increased expenditures through Jordan's Principle are indicative of demand. The issue is that demand is not captured in relation to the goals of Jordan's Principle. The volume of data cannot compensate for a lack of understanding of needs addressed through Jordan's Principle or results for the well-being of children. Jordan's Principle needs to be realigned to ensure its structure, accountability, delivery, and funding are linked.

The long-term sustainability of Jordan's Principle

An established legal principle, Jordan's Principle is a **call to action** to do better for First Nations children.

Jordan's Principle is intended to support access to services in health, social well-being, and education for First Nations children, in their contexts. This is a legal principle that rests atop existing programs to improve them. To transform existing programs and services, the gaps that Jordan's Principle exposes in them must be closed.

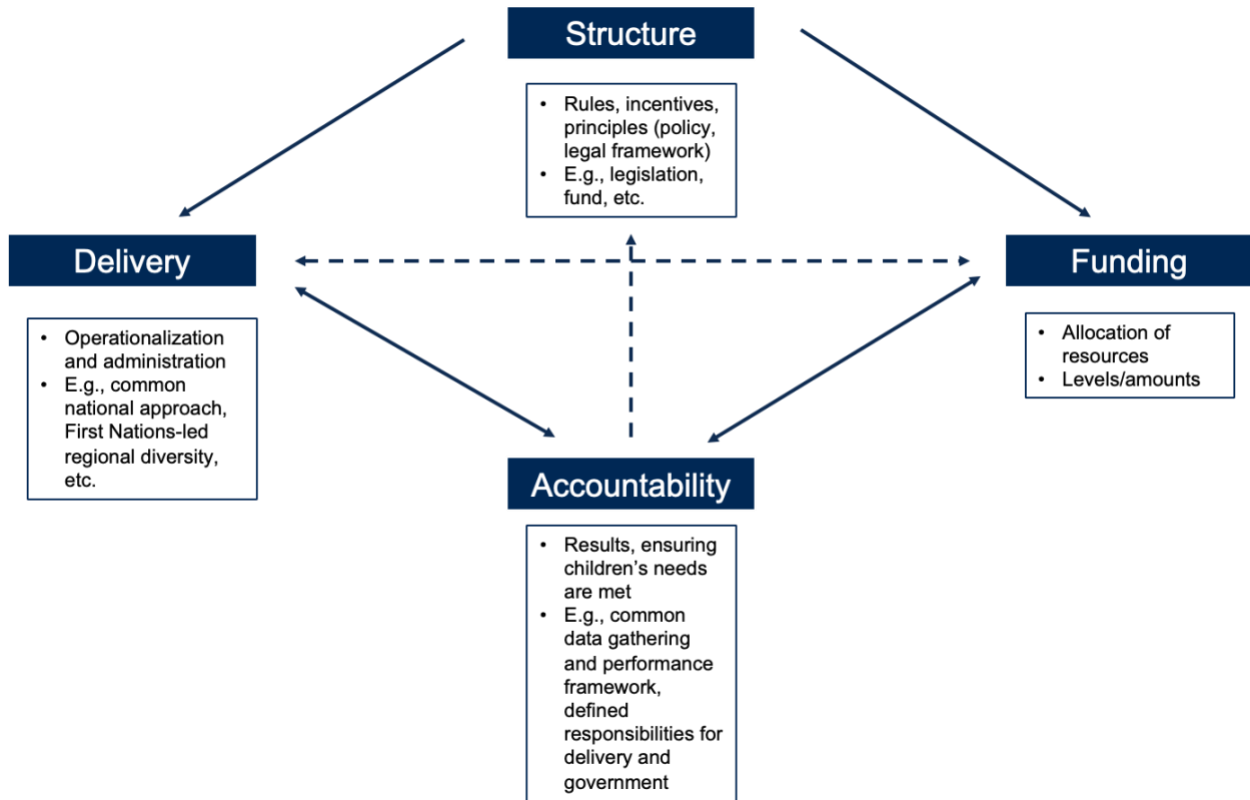
The approach to Jordan's Principle must link **structure, accountability, delivery and funding** (Figure 10).

The structure will influence approaches to delivery and funding requirements. Accountability will be impacted by approaches to delivery, funding amounts, and funding recipients. Over time, structure should be adjusted based on results generated for children (accountability).

While a focus on outcomes is paramount, it will also be necessary to establish **parameters**, i.e., standards for implementation, associated to Jordan's Principle to define eligibility and areas of intervention. Such parameters may include: *individual and group access to Jordan's Principle, wherever a First Nation child lives in Canada, for health, social well-being, and education-related supports, products, and services. In addition, operational parameters should be considered:*

- 1) Segment individual and group requests. They are addressing two different types of needs and should be evaluated and approved (or denied) separately. This means different funding streams and evaluation criteria.
- 2) Urgent requests could be differentiated between life threatening and life altering requests to improve evaluation speed. A service coordinator or designated person at intake could be accountable for defining the nature of urgency in concert with relevant letter of support (see Appendix A).

Figure 10



Jordan’s Principle can be reconceptualized to build a solution for First Nations children by identifying and addressing root causes of need rather than indefinitely addressing gaps. Over time, Jordan’s Principle should help to close gaps permanently by identifying areas of constant need (ideally, so that fewer and fewer interventions are required because circumstances around the child improve).

Structure

Defining a structure for Jordan’s Principle means clarifying the rules and policy that govern its implementation, funding, and performance. A legal rule, Jordan’s Principle lacks an established structure to guide its implementation. Its operation is reliant on administrative decisions, leaving Jordan’s Principle vulnerable to those decisions.

In standard federal activity areas, there are three guiding components:

- Policy statement (*what is being addressed*): purpose/intent of the activity.
- Structure (*how it will be addressed*): legal, regulatory, and funding frameworks.
- Performance (*with what result*): assessment of the activity.

These components are connected. A policy statement, the problem to solve or issue to be addressed guides the structure (which informs delivery and finding) and performance

to monitor for change and define when the goal has been achieved. The guiding components are useful markers for the enactment of a federal program or rule like Jordan’s Principle.

Table 2

<p>What is the problem Jordan’s Principle is trying to solve?</p>	<p>Inequity in the provision of social, education, and health services to First Nations children flowing from jurisdictional issues specific to First Nations children and discrimination in the construction, implementation and function of health, education, and social services provided to First Nations children.</p>
<p>What is the purpose of Jordan’s Principle?</p>	<p>To ensure access to health, education, and social services for First Nations children, guided by substantive equality, or, to ensure substantive equality for First Nations children by providing access to health, education, and social services, including services beyond the “normative standard of care.”</p>
<p>How was the purpose of Jordan’s Principle intended to be achieved?</p>	<p>Initially, Jordan’s Principle was intended to apply a “child-first” principle in the presence of a jurisdictional dispute that would otherwise delay or deny service delivery to a First Nations child—thereby circumventing the dispute in favour of service delivery. However, guided by reference to substantive equality, the ambit of Jordan’s Principle has expanded to attempt to negate all barriers to equity with respect to health and social services for First Nations children, and/or to ensure equity in the provision of those services.</p>
<p>What results has Jordan’s Principle generated?</p>	<p>Indeterminate for ISC. First Nations children and families are benefitting from Jordan’s Principle. However, there is presently not enough publicly available information to determine results of Jordan’s Principle in any meaningful way. The information ISC provides on the results of Jordan’s Principle relate to outputs and are not true results. Without consideration of a child’s context or starting point and the impacts on the child post-intervention, it is presently impossible to qualify what results Jordan’s Principle is generating with respect to substantive equality.</p>
<p>Are there gaps in existing policy and legal frameworks to achieve the intended purpose?</p>	<p>Yes. As a legal principle, Jordan’s Principle is implemented through administrative decisions. It is not a law nor is it a program. It is a legal principle that a government decided to implement. The administrative approach to Jordan’s Principle could be changed by another government by increasing, decreasing, or constraining access to Jordan’s Principle.</p>

Jordan’s Principle’s policy has largely been defined by orders from the CHRT. The orders were interpreted by ISC and its predecessor departments to operationalize Jordan’s Principle. There are statements, guidelines, and rules associated to Jordan’s Principle through ISC’s website. Lacking, however, is a clear policy statement that guides and connects the structure, delivery, accountability, and funding of Jordan’s Principle (Table 2).

A clear policy statement defines the purpose of the action. Consider the policy statement on equalization from the Constitution Act 1982:

Parliament and the government of Canada are committed to the principle of making equalization payments to ensure that provincial governments have

sufficient revenues to provide reasonably comparable levels of public services at reasonably comparable levels of taxation.¹²

From this statement, a statute was enacted, a program established, and funding flowed through transfers with a mandatory five-year review of terms.

From ISC's website¹³ there are various administrative rules for access and procedural guidelines on requests. These elements do not constitute a policy statement. The closest statement to policy is the discussion of ISC's obligations through Jordan's Principle on substantive equality:

Pursuant to the CHRT May 26, 2017 decision as amended, the Government of Canada is to ensure substantive equality in the provision of services to the child, to ensure culturally appropriate services and to safeguard the best interests of the child.

This requires Canada to provide all First Nations children, on and off reserve, and Indigenous children ordinarily living on reserve, with publicly funded benefits, supports, programs, goods and services in a manner and according to a standard that meets their particular needs and circumstances, on a substantively equal basis with non-First Nations children.¹⁴

It may be assumed that this is the policy statement associated to Jordan's Principle, although it is unclear from ISC's website. The content of this policy, if it were enacted, would require linkages to a performance framework to assess achievement of substantive equality. No such framework exists. Further, there is no definition of what constitutes access to services that are substantively equal with non-First Nations children.

A policy statement must be defined for Jordan's Principle to guide structure and performance. To offer a starting point for deliberations on a performance framework with the Regional Working Group, IFSD prepared a policy statement for consideration:

Jordan's Principle (named in honour of Jordan River Anderson) is a source of emergency resources to address the needs of First Nations children (no matter where they live in Canada) that are unmet by existing programs. The program areas include the necessities of life, e.g., housing, water, food, etc., health, e.g., physical, mental health, and allied services, and education, e.g., tools, specialized supports, etc.

¹² Canada, *The Constitution Act 1982*, subsection 36(2).

¹³ Indigenous Services Canada, "Jordan's Principle," last updated December 16, 2024, <https://www.sac-isc.gc.ca/eng/1568396042341/1568396159824>

¹⁴ Indigenous Services Canada, "Jordan's Principle: Substantive equality principles," last updated November 21, 2019, <https://www.sac-isc.gc.ca/eng/1583698429175/1583698455266>

Requests to Jordan's Principle will be assessed to ensure formal equality or substantive equality, by fostering equality in starting points between First Nation and non-First Nation children. The best-interests of the child and a culturally informed approach will be considered.

The Regional Working Group disagreed with IFSD's statement and the premise of a discussion of a policy statement. A policy statement was for leadership to decide. Instead, the Regional Working Group offered guiding statements and considerations on the spirit and intent of Jordan's Principle:

- 1) Addressing the **root causes of need and gaps in existing programs and services**, especially in housing, health, and social services.
- 2) **Recognizing and understanding requests in their contexts** to achieve substantive equality because different places have different needs.
- 3) Accessing services, supports, and products **wherever and whenever needed**.
- 4) **Differentiating** between the **needs of children and the wants of parents**.
- 5) **Empowering families** to end cycles of dependency.
- 6) **Training and development for First Nations by First Nations** to empower First Nations in their communities to support the delivery of Jordan's Principle, leveraging local knowledge.

When considering the common elements of the Regional Working Group's recommendations and statements, the following summary statement is proposed:

Jordan's Principle is a sacred gift from Jordan River Anderson to ensure First Nations children have the supports, services, and products whenever they need them wherever they need them.

Jordan's Principle ensures that the root causes of need and gaps in existing programs and services are addressed (until they can be permanently repaired).

Children and youth live in different places. The pursuit of substantive equality requires that their unique contexts be recognized in the delivery of and access to services, supports, and products through Jordan's Principle.

To sustainably deliver Jordan's Principle in the cultural and linguistic contexts of First Nations, local talent will be essential. Training by First Nations for First Nations to develop local talent will be imperative to the success and sustainability of Jordan's Principle.

The content will inform the rules to govern a restructured approach to Jordan's Principle, guiding scope and parameters of activity.

Major federal programs that are demand-driven (as is Jordan’s Principle), have clear policy, legal, and funding frameworks (Table 3). These elements are often defined in statute, with statutory funding.¹⁵ The structure of these major programs provide clarity on access and eligibility, as well as parameters to establish funding requirements and forecasts of expenditures on Employment Insurance (EI)¹⁶ and Old Age Security (OAS)¹⁷.

Table 3

Policies	Problem to solve/policy statement	Funding approach	Examples of driving factors that influence funding
Jordan’s Principle	“[...] a child-first principle aimed at resolving jurisdictional disputes that impeded First Nations children from accessing government services. [...] a legal obligation [...], that responds to the unmet needs of First Nation children, regardless of where they live in Canada. The demand-driven initiative supports families in accessing products, services and supports for First Nation children and youth to help with a wide range of health, social and educational needs.” ¹⁸	The Government of Canada evaluates requests and covers the cost of approved products, services, and supports. There is no defined baseline or factors to estimate demand.	Unclear (e.g., how are unmet needs quantified?)
Old Age Security (OAS)	“[T]o ensure a minimum income for seniors and contribute to their income	Each OAS program (4 in total) has an annual net income threshold to receive benefit payments and maximum monthly benefit payments.	Population over age 65, resident in Canada Life expectancy Income level

¹⁵ Government of Canada, “2024-25 Estimates,” last modified June 12, 2024, <https://www.canada.ca/en/treasury-board-secretariat/services/planned-government-spending/government-expenditure-plan-main-estimates/2024-25-estimates.html>.

¹⁶ Office of the Superintendent of Financial Institutions and Office of the Chief Actuary, “2025 Actuarial report on the Employment Insurance Premium Rate,” *Government of Canada*, September 13, 2024, <https://www.osfi-bsif.gc.ca/en/oca/actuarial-reports/2025-actuarial-report-employment-insurance-premium-rate>.

¹⁷ Office of the Chief Actuary, “Actuarial Report (18th) on the Old Age Security Program as at 31 December 2021,” *Government of Canada*, November 3, 2023, <https://www.osfi-bsif.gc.ca/en/oca/actuarial-reports/actuarial-report-18th-old-age-security-program-31-december-2021>.

¹⁸ GC InfoBase, “Infographic for Jordan’s Principle and the Inuit Child First Initiative,” *Government of Canada*, accessed February 19, 2025, <https://www.tbs-sct.canada.ca/ems-sgd/edb-bdd/index-eng.html#infographic/program/INDSC-BYP06/intro/>.

	replacement in retirement.” ¹⁹	Benefit payments are accessed based on criteria, e.g., age, income, etc. ²⁰	Inflation
Employment Insurance (EI)	To “provide eligible workers with temporary support to partially replace lost employment income.” ²¹	<p>EI benefits are 55% of average insurable weekly earnings²² to a maximum of \$65,700 annually (\$695 weekly).</p> <p>There are various rules that govern duration of the EI benefit. This is impacted by components such as earnings, seasonality of work, regional unemployment rate, etc.²³</p>	<p>Population over age 15</p> <p>Labour market data by region, e.g., participation, unemployment, self-employment, duration, etc.</p> <p>Earnings and benefits</p>

From a public finance perspective, Jordan’s Principle merits the same structural parameters that exist for EI and OAS to ensure its longevity. With Jordan’s Principle, increased expenditure and broadened access were presumed to address needs for First Nations children. The failing of the approach is that it leaves Jordan’s Principle vulnerable to administrative decisions. Rules/structure and funding linked to relevant data (as in the cases of EI, OAS and other important programs), protects the long-term sustainability of Jordan’s Principle to ensure it can meet the needs of First Nations children.

There are options²⁴ for the structure of Jordan’s Principle (Table 4) that can support differentiated delivery mechanisms. The options can be combined to produce various structures. For instance, the ombud and boards of the administrative decision-making

¹⁹ GC InfoBase, “Infographic for Old Age Security,” *Government of Canada*, accessed February 14, 2025, <https://www.tbs-sct.canada.ca/ems-sgd/edb-bdd/index-eng.html#infographic/program/HRSD-BGN01/intro>.

²⁰ Employment and Social Development Canada, “Old Age Security payment amounts,” *Government of Canada*, October 1, 2024, <https://www.canada.ca/en/services/benefits/publicpensions/cpp/old-age-security/payments.html>.

²¹ GC InfoBase, “Infographic for Employment Insurance,” *Government of Canada*, accessed February 14, 2025, <https://www.tbs-sct.canada.ca/ems-sgd/edb-bdd/index-eng.html#infographic/program/HRSD-BGO01/intro>.

²² Canada Revenue Agency determines what constitutes insurable earnings. These include “most of the different types of compensation from employment, such as wages, tips, bonuses and commissions.”

²³ Government of Canada, “EI regular benefits: How much you could receive,” last modified December 31, 2024, <https://www.canada.ca/en/services/benefits/ei/ei-regular-benefit/benefit-amount.html>.

²⁴ The options presented below should be read through the lens of First Nations governance. Pursuant to Assembly of First Nations (AFN) Resolution 60/2024, First Nations-in-Assembly will review and provide direction on negotiations and decisions for the reform of Jordan’s Principle to the AFN Executive Committee and the Children’s Chiefs Commission. Such direction should include representation and appointment processes for First Nations-led boards included in several options. IFSD assumes that First Nations-in-Assembly (or First Nations’ chosen approach for guidance) will provide direction on the course forward for Jordan’s Principle. The spirit, intent, and principles of a reformed approach should be captured in a formal agreement or in legislation (co-developed with First Nations) to underscore their significance.

model can be included in the special operating agency. Each option has political considerations and vulnerabilities. Regardless of the approach chosen, the principles of accountability, funding sustainability, and transparency will be paramount to ensuring the well-being of children. The status quo is thus the least desirable option relative to these principles.

Table 4

Structure (options)	Impacts			
	Delivery	Funding	Accountability	Political considerations and vulnerabilities
Legislation: <ul style="list-style-type: none"> • Law to define how Jordan's Principle should be administered, including parameters for access and service delivery 	<ul style="list-style-type: none"> • Various modalities, e.g., First Nation-led, direct to ISC, etc. 	<ul style="list-style-type: none"> • Funding may be included as a formula in the legislation (statutory funding), or may remain an annually voted appropriation (non-statutory funding) 	<ul style="list-style-type: none"> • Reporting by administrator with requirement for national reporting (national reporting body to be defined) 	<ul style="list-style-type: none"> • Subject to change but would require amendment and parliamentary processes • Insufficient time with current government to propose and pass legislation • May limit adaptability to future needs
Managed Fund: <ul style="list-style-type: none"> • Entity established to manage and make available a pool of resources to support the delivery of Jordan's Principle 	<ul style="list-style-type: none"> • Various modalities, e.g., First Nation-led, regional organization, but no ISC 	Options include: <ul style="list-style-type: none"> • Endowment • Funding tied to revenue source • Annual appropriation 	<ul style="list-style-type: none"> • First Nations-board for oversight of fund • Fund resides within ISC • Reporting by administrators with requirements for national reporting, board of fund or director to report annually 	<ul style="list-style-type: none"> • Fund administered separate from government eliminates its accountability for continuous action and improvement • Parameter scope is critical. Too loose, funding may be unsustainable. Too strict, insufficient impact.
Administrative decision-making: <ul style="list-style-type: none"> • Federal body with three components: 1) evaluation board to assess individual requests; 2) fund managed by a board to assess group requests; 3) ombud to report annually on outcomes and to define federal program gaps (relative to the Spirit Bear or similar plan) • Established via legislation 	<ul style="list-style-type: none"> • National approach to application assessment to promote consistency 	<ul style="list-style-type: none"> • Funding may be statutory or non-statutory (annual appropriation), commensurate to mandate 	<ul style="list-style-type: none"> • Ombud would report annually on results based on a First Nations-defined performance framework combining case-level and national data • Additional reporting (naming and shaming) on federal program gaps being addressed by Jordan's Principle 	<ul style="list-style-type: none"> • Legislation required • Remove ISC from administration of Jordan's Principle • National delivery only, i.e., no regional or First Nations-delivery
Hybrid approach - regional delivery with arms-length administrative decision-making: <ul style="list-style-type: none"> • Similar structure to above, except regions/First Nations would administer requests 	<ul style="list-style-type: none"> • Local/regional delivery • Centralized boards operate to adjudicate disputes and promote consistency in decision-making 	<ul style="list-style-type: none"> • Funding may be statutory or non-statutory (annual appropriation), commensurate to mandate 	<ul style="list-style-type: none"> • Ombud role similar to above, with additional responsibilities to promote consistent local/regional data gathering 	<ul style="list-style-type: none"> • Legislation required • Remove ISC from administration of Jordan's Principle • Roles and responsibilities of administrative decision making

<ul style="list-style-type: none"> Administrative interpretations (e.g., guidelines, etc.) and data gathering are developed centrally and implemented locally 				<p>and local regional authorities would need to be negotiated and defined (they may differ by region and First Nations mandated organization)</p> <ul style="list-style-type: none"> Allows for regional variance, but could result in less consistency than centralization
<p>Special operating agency (SOA):</p> <ul style="list-style-type: none"> Unit within a department with independence and a separate accountability arrangement Framework agreement (between deputy minister, minister, and Treasury Board) Administrative interpretations (e.g., guidelines, etc.) and data gathering are developed centrally (with First Nations) and implemented locally 	<ul style="list-style-type: none"> Local/regional delivery Centralized boards operate to adjudicate disputes and promote consistency in decision-making Differentiation between group and individual requests with guidelines and boards to adjudicate disputes 	<ul style="list-style-type: none"> Funding included in departmental reference levels, i.e., annual appropriation Special purpose allotment (SPA) can be applied to ensure funding cannot be reallocated within the department Separate reporting requirements to uphold accountability (relative to standard departmental performance reporting) 	<ul style="list-style-type: none"> Ombud would report annually on results based on a First Nations-defined performance framework combining case-level and national data Additional reporting (naming and shaming) on federal program gaps being addressed by Jordan’s Principle Ombud would interface with department for accountability on closing gaps in existing program areas, and ensuring administration of Jordan’s Principle is consistent in the department 	<ul style="list-style-type: none"> Administrative mechanism that will allow for greater design flexibility No separate legislation for the SOA, it exists within the department and is subject to changes based on the framework agreement between the deputy minister, minister, and Treasury Board, co-developed with First Nations
<p>Status quo</p>	<ul style="list-style-type: none"> Current patchwork (direct to ISC, First Nation-led, regional bodies) 	<ul style="list-style-type: none"> Non-statutory, annual appropriation 	<ul style="list-style-type: none"> Does not exist 	<ul style="list-style-type: none"> In its current form, Jordan’s Principle has systemic weaknesses that imperil its sustainability

Summative observations:

Irrespective of the chosen reformed structure for Jordan’s Principle:

- 1) Clarify the Jordan’s Principle baseline and cap funding (with escalators) for a 2 to 3 year period until data gathered from Jordan’s Principle provides clarity on needs and funding requirements.
- 2) Define the reformed structure for Jordan’s Principle with consensus of practitioners and the parties. Implement the change with a two-track approach:
 - a. Track 1: Gather relevant data (as defined in #1) to clarify the needs of First Nations children and funding through Jordan’s Principle.
 - b. Track 2: Leverage the gathered data to redefine eligibility parameters for Jordan’s Principle. The gathered data can help to redefine a baseline, suitable escalators, and a performance framework linked to the spirit and intent of Jordan’s Principle.

Accountability

Jordan’s Principle is helping children by ensuring they have access to supports and services when they need them. There has been a consistent growth in the number of requests to Jordan’s Principle across fiscal years. While Jordan’s Principle is concealing gaps in other program and service areas, clarity around its operation and impacts is needed for its sustainability.

ISC’s current performance measurement of Jordan’s Principle

ISC is measuring the performance of Jordan’s Principle with a single indicator: the number of products, services, and supports multiplied by the number of associated children (Figure 11). This means that neither the number of items nor the number of individual children making requests is defined in reporting. This indicator is useless in assessing equality or substantive equality for First Nations children. The utility of the indicator is only in counting the instances of issued products or services.

This is a problem. ISC’s approach does not align to the Government of Canada’s *Policy on Results*²⁵, or the *Policy on Transfer Payments*²⁶. The essence of these

²⁵ Treasury Board of Canada Secretariat, “Policy on Results,” Government of Canada, last modified July 1, 2016, <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=31300> . See sections:

- 3.1.1. Improve the achievement of results across government; and
- 3.1.2 Enhance the understanding of the results government seeks to achieve, does achieve, and the resources used to achieve them.

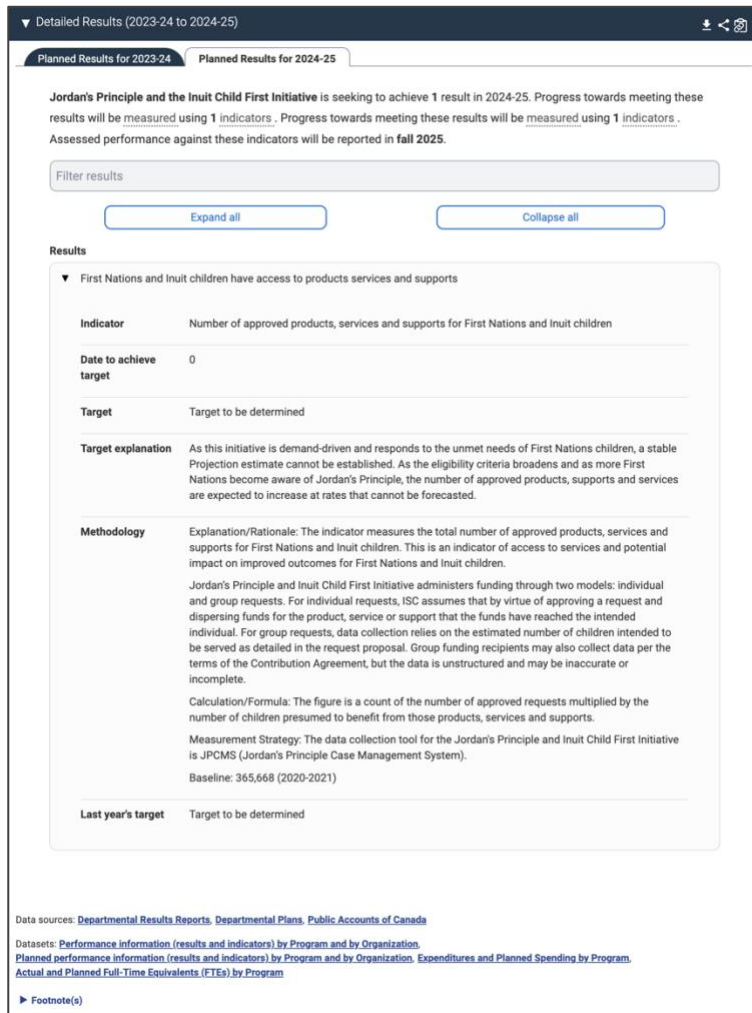
²⁶ Treasury Board of Canada Secretariat, “Policy on Transfer Payments,” Government of Canada, last modified April 4, 2022, <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=13525>.

See the following sections in *Policy on Transfer Payments*:

- 4.2.2 Transfer payment programs are designed, delivered and managed in a way that achieves outcomes, contributes to departmental results, takes account of risk and clearly demonstrates value for money;

interconnected policies is to ensure that public expenditures are delivering intended results, with appropriate oversight and controls. This means that inputs (i.e. resources), outputs (i.e. program activities), and outcomes (i.e. results) should all be measured to understand program performance. ISC is only capturing program inputs (i.e. dollars spent) and some vague form of outputs (i.e. activities).

Figure 11



[...]

4.2.4 Transfer payment programs are accessible, understandable and useable by applicants and recipients, including the following:

4.2.4.1 The administrative requirements on applicants and recipients, which are required to ensure effective control, transparency and accountability, are proportionate to the level of risks specific to the program, the value of funding and the risk profile of applicants and recipients;

4.2.4.2 Applicants and recipients are engaged in support of innovation, continuous improvement, and the establishment of fair, transparent and positive relations with them; [...].

The administrative challenges with Jordan’s Principle, from extensive backlogs in opening requests and inconsistent interpretation of rules, to a lack of measurement and monitoring for results, fails to meet the objectives of both policies. The administration of Jordan’s Principle has been a consistent issue before the CHRT. There have been multiple non-compliance motions brought forward to highlight its ineffectual administration and challenges for those seeking access through Jordan’s Principle. The administration stemming from the reactive implementation of Jordan’s Principle has resulted in a lack of structure and limited data to assess results for children. These issues were clearly defined in an internal departmental audit in 2019,²⁷ yet, remain unresolved.

For Jordan’s Principle to be sustainable, its performance must be measurable, and its results evidenced (Table 5).

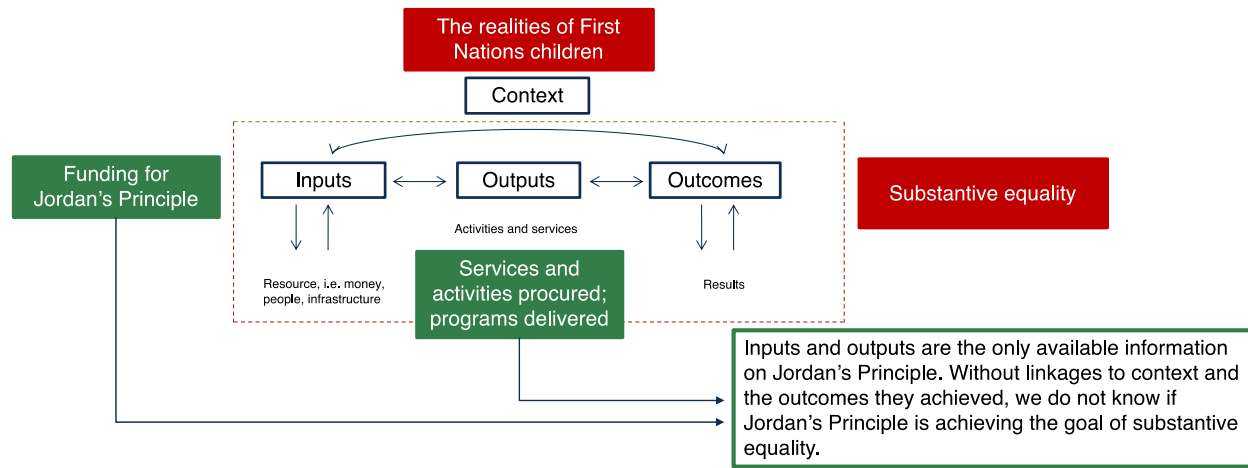
Table 5

What we know	Jordan’s Principle is addressing needs.
What we don’t know	The root causes of requests to Jordan’s Principle...why are children in need? We know inequalities exist, but what are they? How are they affecting children?
Why this matters	Jordan’s Principle is concealing gaps in existing program areas. Understanding the root causes of need is critical to developing informed policy and funding decisions to support well-being over the long-term.

*As a legal principle, Jordan’s Principle’s operation is contingent on administrative decisions by government. An administrative change can increase, decrease, or restrict access to Jordan’s Principle. Any program or initiative that cannot demonstrate its performance is susceptible to adverse funding or administrative decisions. There is no way of knowing if the funding from Jordan’s Principle is addressing gaps in substantive equality. This would require linking **why** the claim was being made, i.e., the shortfall being addressed, and **what** happened to the child’s/group’s wellness after the claim (Figure 12).*

²⁷ Indigenous Services Canada, “Audit of the Implementation of Jordan’s Principle,” Government of Canada, last modified October 28, 2020, <https://www.sac-isc.gc.ca/eng/1594378735468/1594378764255>.

Figure 12



There are core pieces of information that are missing from data capture on Jordan’s Principle. Namely, why children are seeking support from Jordan’s Principle and what happens to them following the intervention. A **consistent approach** to gathering **child-centred data** means more **relevant data** that can be used to **measure and monitor children’s needs and identify gaps in existing programs and services**.

As expressed by the Regional Working Group, the goal of data gathering should be *consistency with decency*. A consistent approach ensures regular and common information is gathered to benefit all children by improving Jordan’s Principle and identifying gaps in existing programs. Decency means engaging respectfully with children and families, avoiding duplication of requests, and following OCAP® Principles.

Presently, data gathering is inconsistent across regions. While some First Nations or regions are gathering good information capacity for analyzing it is limited. A common data gathering framework, defined by Jordan’s Principle technical experts, would help to standardize access to and administration of Jordan’s Principle.

The limitations of consistently captured relevant data were a concern of the Regional Working Group. The consideration was also reflected in case studies, in which those delivering Jordan’s Principle designed their own tools for data capture and for assessing the reasonableness of expenditures where none existed. The extract below from the Regional Working Group’s meeting captures concerns about the collection and analysis of data for Jordan’s Principle:

A critical concern was identified in the discussions: the current national data for Jordan’s Principle, predominantly administrative in nature, fails to capture the complex and unique needs of First Nations children. This data does not reflect the realities on the ground, nor the specific needs of the children, families, and communities seeking support from Jordan’s Principle.

To address the gap between a community’s reality and requests to Jordan’s Principle, it was proposed that local data about First Nations should be gathered by First Nations to establish a baseline of well-being (in compliance with OCAP® principles). This community-level information on well-being could be

used to help contextualize requests to Jordan's Principle. This dual approach of community data with administrative data could offer a more comprehensive view of the needs and challenges faced by First Nations children.

Regionally, administrative practices to data gathering share many commonalities with some variations (see Appendix A).

There is a recognized opportunity to develop a comprehensive set of indicators to test data gathering methods specific to Jordan's Principle. The working group underscored the importance of self-reliance in these processes to ensure that control over information remains with the First Nations and their designated organizations.

To address these challenges, the working group identified several areas in need of development:

- 1) Support for capacity building for data collection: training for people, the right tools, and processes are needed to equip First Nations and their organizations for data gathering and analysis.
- 2) Gap analysis of existing federal programs: Jordan's Principle helps a lot of children but it also covers gaps in existing federal program areas. Those gaps need to be identified and quantified.
- 3) Data management infrastructure: it would be powerful to have a consistent approach for First Nations-led data gathering and analysis for Jordan's Principle. Such infrastructure would support the aggregation of data in a manner that facilitates comparative analysis and transparent reporting.
- 4) Data disaggregation: the working group called on ISC to disaggregate and report on data by territory (Northwest Territories, Yukon, Nunavut), rather than rolling it up into an aggregate category.

Read the full second meeting summary [here](#).

Regional and national aggregation of data and analysis are possible, when information gathering is standardized and relevant to the delivery of Jordan's Principle.

IFSD understands ISC's current data gathering and processing of requests as follows:

- 1) Intake: information entered
- 2) Review: recommended action
- 3) Decision: confirmed/denied
- 4) Notification: communication of decision
- 5) Payment: issued to recipient

From the backlogs identified in ISC's December 2024 letter to the CHRT, it appears that ISC would benefit from a common online intake form to alleviate pressures at the intake and review steps. The same form would benefit First Nations and other organizations delivering Jordan's Principle to capture consistent data for analysis. The data gathered could improve connections between outputs and desired outcomes. At the time of writing, and as documented in internal audits, ISC cannot demonstrate results in Jordan's Principle.

ISC's internal challenge with Jordan's Principle appears to be operational and administrative. It is not *more* people that are needed, but clearer guidelines and tools

for managing Jordan's Principle. The implementation of Jordan's Principle has been layered, inconsistent, and disjointed as ISC reacted to implement CHRT rulings.²⁸

Given the internal challenges, there needs to be space within ISC for employees associated to Jordan's Principle to try and fail at improving operations. There are opportunities for pilot projects with leading First Nations organizations delivering Jordan's Principle with capacity to collaborate with ISC.

There are various considerations for improving the administration of Jordan's Principle:

- 1) Reform ISC's intake process.
- 2) Invest in technology, i.e., don't try to fix what exists, build an alternative child-centred approach to intake and request management.
- 3) Focus on the child when gathering data. This means those locally delivering Jordan's Principle should gather data and share relevant subsets with ISC.

Centering the child in data gathering and analysis will be imperative for understanding if the operation of Jordan's Principle is upholding its spirit and intent of substantive equality.

The approach will take at least three years to be functional. Year 1 will be the introduction and implementation of a common data gathering framework. Years 2 and 3 will be for data gathering and analysis. At the close of Year 3, the information can be analyzed not to define results, but to define an initial set of parameters to inform Jordan's Principle. With the information on the gaps it is addressing or the surrounding programs and service failures it is concealing, an approach to addressing those gaps can be defined.

There are core pieces of information that are missing from assessments of Jordan's Principle. Namely, why children are seeking support from Jordan's Principle and what happens to them following the intervention. In addition to the information gap, there are different approaches to delivering Jordan's Principle across the country. The inconsistent delivery means that there are inconsistent approaches to applying Jordan's Principle, and to gathering the associated information.

There is no clear starting point or capture of change in state for the child. This makes it nearly impossible to comment on progress toward substantive equality or more basic connections between expenditures through Jordan's Principle and outcomes for children.

Table 6 provides an overview of basic information about a child making a request, much of which could be coded at intake.

²⁸ Indigenous Services Canada, "Audit of the Implementation of Jordan's Principle," Government of Canada, last modified October 28, 2020, <https://www.sac-isc.gc.ca/eng/1594378735468/1594378764255>.

Table 6

Nature of request	<ul style="list-style-type: none"> • Individual • Group • Point-in-time • Ongoing/long-term • Recurrent (varying intervals) • Urgency: immediate urgent need or other
Context	<ul style="list-style-type: none"> • Location: on-/off-reserve • Province/territory and name of FN or city/town • Geographic zone (1-4) • Age of child • Poverty/deprivation, i.e., expressed need for basic necessities, income supports, etc. • Risk factors for child, e.g., health, mental health, environment, etc. • Requestor’s relation to child • Letter of support from professional/other
Gap analysis	<ul style="list-style-type: none"> • WHY is the child seeking support through Jordan’s Principle, e.g., deprivation/poverty, geographic location, lack of services, unfunded by other program, etc. • Were other supports, services, or programs sought prior to the request? Why is support being sought through Jordan’s Principle?
Input	<ul style="list-style-type: none"> • Date of request • Location of intake • Item/service/support requested (use ISC’s list?) • Cost • Supporting letter/referral
Output	<ul style="list-style-type: none"> • Other services/referrals made through request, e.g., provincial/territorial service, federal program, First Nation or organization program, such as budget building or healthy grocery shopping • Evaluation of request • Amount issued v. requested; item/service issued v. requested • Risk factors to note for parent or child • Expected short-term impact on child (may be best as a statement, i.e., with Product X, the child will...)
Outcome	<ul style="list-style-type: none"> • Starting point of child (at time of request) versus follow-up at close of file or point-in-time (A possible approach is to follow a sample of children accessing Jordan’s Principle to assess outcomes over time) • Did the child or their family make another requested? • Did the child improve or no longer require additional support following the intervention? • Were gaps in other service areas identified?

Information from the consistent capture of relevant data on Jordan’s Principle can be used to inform planning and expenditures. If the data or a similar subset from Table 6 were gathered, it could be used to define needs, track gaps in other program areas, and inform parameters for accessing Jordan’s Principle. Such consistency could improve planning and create stability for those accessing and delivering Jordan’s Principles. Guidelines and changes to date have been ad-hoc and reactive. Using relevant

information from Jordan's Principle to reset its course would be a step towards stability and sustainability.

Building from a common data gathering framework, a performance framework could be informed. The Regional Working Group defined a two-pronged approach to data capture to support a performance framework:

- 1) Case-level information focused on the child;
- 2) Community-level data to capture context.

A performance framework is a tool to measure to monitor change relative to a goal or desired outcome. With all the information gathered on Jordan's Principle, we still do not know *why* children are seeking support and *what* happens to them following an intervention. With these gaps, there is no way of assessing progress toward formal or substantive equality through Jordan's Principle.

A national strategic performance framework for Jordan's Principle is an essential component of a sustainable approach to Jordan's Principle. The Regional Working Group defined the importance of the framework as a tool to ensure equity for First Nations children and to define gaps to improve programs and services. From a public finance perspective, the evidence generated from the framework can help to sustain Jordan's Principle by demonstrating its results for children, especially, when faced with decisions on its expenditures.

Building a national strategic performance framework for Jordan's Principle would:

- 1) Measure and monitor the needs of children;
- 2) Identify gaps in existing programs and services;
- 3) Hold Canada accountable;
- 4) Ensure the structure, delivery, and funding approaches to Jordan's Principle are working;
- 5) Measure progress toward the defined spirit and intent of Jordan's Principle.

Wholistic well-being was a guiding principle for the Regional Working Group for the national strategic performance framework. In their discussions, the Regional Working Group defined a series of national indicators. Some indicators were aggregations of case-level data and others were broad community-level indicators that could be captured from public and other data sources.

The indicators defined by the Regional Working Group are captured in Table 7. They are clustered thematically. IFSD was tasked by the Regional Working Group with identifying broad community-level indicators to contextualize the case-based data (also included in Table 7). To operationalize the performance framework, definitions for indicators, measures, and data capture are to be defined (see Table 7). Sources of information include case level data (aggregated), Census data, Regional Health Survey (RHS) data, and ISC data.

The development and operationalization of a strategic performance framework will take time. It is, however, imperative that it be done to ensure accountability in Jordan's Principle. This means ensuring structure, delivery, and funding are meeting the needs of children.

Table 7

Category	Indicators	For future use				
		Definition	Measure	Location of data capture	Availability of data	Case or community level
Education and pedagogy	Literacy rates in English and/or French					
	Literacy rates in Indigenous languages					
	Numeracy rates					
	Elementary school completion rate					
	Duration to completion of high school					
	Age at high school graduation					
	Change in expected educational outcomes					
	Post-graduation outcomes for youth with complex or special needs					
	Support or service to develop inherent talent or ability					
Family well-being	Sense of community belonging					
	Stability of family arrangement					
	Contact with child and family services					
	Children in care accessing Jordan's Principle					
Health and wellness	Recreational opportunities around the child					
	Instances of exceptional health-related supports and services					
	Health outcomes at least equal to or better than the general population					
	Health services consistent with Canada Health Act standards (as a minimum)					
	Instances of requests for mental health and/or spiritual supports defined as: crisis, maintenance, or normal/self-care					

Nature of requests and defined needs	WHY – Reason for accessing Jordan's Principle (root cause(s))					
	Instances of intergenerational Jordan's Principle requests, e.g., adolescent parent accessing Jordan's Principle					
	Nature of request: point in time; on-going/long-term; repeated					
	Instances of children ageing out but requiring ongoing support					
	Instance of navigation to access Jordan's Principle					
	Instances of referrals to existing supports and services					
	Identifying the source of the referral, e.g., Elder, physician, etc.					
	Were the child's needs met through Jordan's Principle					
Community well-being	Instances of community trauma					
	Cultural knowledge					
	Access to land					
	Access to Elders					
	Community emergencies impacting well-being					
Access and funding	Number of non-Indigenous and non-First Nation organizations/recipients receiving funding through Jordan's Principle					
	Documented fee increases or supplemental fees incurred when paid through Jordan's Principle					
	*See also questions to regions					
	Details on requests and transfer amounts through Jordan's Principle					
Broad national indicators (proposed by IFSD)	Housing suitability					
	Housing in need of repair					
	Food security					
	Rates of substance misuse (alcohol, drugs)					
	Access to potable water					
	Deprivation (income measure, relative to the relevant Market Basket Measure)					

Employment rate					
Unemployment rate					
Highest level of educational completion					
Instance of critical health issues (Note: Dependent on Regional Health Survey data)					
Access to health and dental services (Note: Dependent on Regional Health Survey data)					
Rates of access to Income Assistance					
Population by geographic zone					

Delivery

The administration of Jordan’s Principle by ISC is addressed in the structure, funding, and accountability sections of this brief. In this section, analysis will focus on the delivery of Jordan’s Principle by practitioners across regions.

Jordan’s Principle is being delivered differently across regions. There are four main approaches to the delivery of Jordan’s Principle:

- 1) **Service coordination:** Service coordinators in First Nations support applications and submit them to ISC.
- 2) **First Nation-administered:** First Nations accept and approve applications to Jordan’s Principle (with certain limitations). Any applications that are beyond scope or to be denied are referred to ISC.
- 3) **First Nation organization-administered:** First Nations organizations support applications and/or accept and approve applications to Jordan’s Principle.
- 4) **Direct to ISC:** Requests for support are submitted directly to ISC.

Within the diversity of regional approaches, what is permitted as a practice in one region, e.g., the use of pre-paid credit cards, gift cards, vouchers, was not necessarily permitted in all regions. An extract of the first Regional Working Group meeting summary captures the different approaches and rules for delivery:

Different approaches, different people, and different rules yield different results. The regional working group shared the diversity of their approaches to delivering Jordan's Principle (see Appendix B for an overview of regional approaches to requests). There were creative approaches and solutions that were shared, but it was clear that what was permitted in one region, e.g., pre-paid credit cards, gift cards, vouchers, was not necessarily permitted in others. The variance in accepted approaches needs to be addressed.

There was special emphasis placed on the importance of relationships with regional ISC officials, namely focal points. As in any interaction, positive relationships can promote collaboration and mutually beneficial solutions. Certain regions highlighted the strengths and benefits of their positive working relationships with regional ISC officials. One region even noted that their ISC counterparts spend time learning about their First Nations and have quarterly meetings scheduled with First Nations and their regional support organization. These regular interactions are opportunities for information sharing, learning, and problem solving, which promote better outcomes for the region.

Participants underscored the impact one public servant can have in managing their request. If a Jordan's Principle request cannot be approved regionally, it is escalated to headquarters, entering 'the ISC blackbox,' leaving the requestor with limited information and recourse until a decision is rendered. With significant staffing changes in some regions, participants expressed challenges with consistent decision-making at the regional level. What an official four weeks ago may have approved, another may be denying. The advocacy for consistency is left to those working in and supporting First Nations. The Caring Society is regularly called upon for support and intervention across regions when challenges arise with delayed responses and denied claims.

There was a call for greater transparency and information sharing on how decisions are made regionally, what parameters are in place to guide decisions, and whether there are inter-regional assessments of consistency in the application of Jordan's Principle. Participants suggested that ISC's officials and those working in First Nations and supporting organizations should all access the same training to ensure consistent information is shared. In their discussion on the future of Jordan's Principle, the regional working group noted the need for national standards and goals with local care and control of delivery to mitigate the variances.

Read the full first meeting summary [here](#).

IFSD has worked with First Nations and First Nations organizations to develop nine case studies on the delivery of Jordan's Principle (five of which have received approval for use in public reporting). The cases survey different models and approaches to delivering Jordan's Principle. Mandates and activities differ, highlighting the varying levels of risk, expertise, and internal controls required to manage activities associated to Jordan's Principle.

The cases represent the ways in which Jordan's Principle has been applied and leveraged to meet different needs. Consider the Yukon First Nations Education Directorate (YFNED), which built a comprehensive approach to education related supports for youth. From the redesign of curriculum, to school-based advocates, and dedicated professional services like psychologists, YFNED is "building better communities." They have defined their own approach and actualize it by taking advantage of the lack of structure and policy framework around Jordan's Principle. It's a double-edged sword. While the flexibility suits them, it also means that criteria and funding access can change, and reporting requirements are inconsistent limiting information on how children are doing (Appendix B).

Frontline workers attending Nishnawbe Aski Nation’s (NAN) “As We Gather,” conference highlighted operational challenges in Jordan’s Principle and proposed operational improvements. They emphasized the scope of their responsibilities in Jordan’s Principle that extend beyond their official functions (Appendix C).

A service coordinator shared their experience in developing their own criteria for managing requests through Jordan’s Principle. They were concerned that Jordan’s Principle is creating a reliance on temporary solutions without building capacity and resilience in families. Service Coordinator X considers a return to the spirit and intent of Jordan’s Principle to be the meaningful support of children and families by focusing on needs, building resilience in families, and providing tools for sustainable well-being (Appendix D).

A self-governing First Nation implementing a pilot program shared their efforts to stand-up a delivery approach to Jordan’s Principle. Their efforts to serve their citizens were challenged by the inconsistent management of Jordan’s Principle by ISC (Appendix E).

The Council of Yukon First Nations (CYFN) built their own approach for the operationalization of Jordan’s Principle. With an intake process, expenditure tracking, and case management system, CYFN is documenting how Jordan’s Principle is being used to address the root causes of need. Extending their existing health and social mandate, CYFN leveraged their internal practices to introduce needed parameters on the delivery of Jordan’s Principle to support needs (Appendix F).

In surveying the different modes of delivery across regions, the importance of variation to meet different contexts is clear. However, what is also evident, is the gap in consistent parameters and criteria to support practitioners in the delivery of Jordan’s Principle. In many cases, practitioners themselves defined tools for data gathering and assessment where none existed. Their approaches are also reactions to the varied allowable expenditures and practices in the regions. While diversity in delivery to meet differentiated needs is useful, it should not mean that First Nations children have different likelihoods of access based on residence.

Funding

There are two crucial elements for estimating the costs of Jordan’s Principle:

- 1) Baseline, i.e., a starting point. How the baseline is defined and what is included should be clarified (Table 8);
- 2) Escalators, i.e., the factors that influence/change the base expenditure over time (Table 9).

Jordan’s Principle has seen significant increases in expenditures in the last three fiscal years. The significant change could be due to a change in demand, in the rules for access, or some combination thereof.

Other demand-driven programs in Canada have defined factors that influence their expenditures and are established in law. While Jordan’s Principle is demand-driven, it is treated differently. A legal rule, it does not have the structure or defined funding arrangement of Employment Insurance (EI) or Old Age Security (OAS). This is a vulnerability – discussed in the Structure section of this brief – that should be addressed.

At the time of writing, we do not have sufficient and consistently captured data on Jordan’s Principle to estimate a bottom-up cost based on defined factors, e.g., program or service gaps, needs of children, etc. Nor is there consistency in delivery mechanisms and cost drivers that would allow for estimates to be inferred. Therefore, IFSD proposes estimating the cost of Jordan’s Principle on an interim basis until such time that data capture is improved to inform access parameters and costs. The inconsistent data that is untethered to the spirit and intent of Jordan’s Principle mean that expenditure data cannot be linked to needs or other sources of demand. What we know is that expenditures are increasing, but we do not know why, nor is there appropriate data to decipher cause.

To estimate the cost of Jordan’s Principle, IFSD is proposing options for a baseline and escalators. This is an interim approach until better information (tied to the spirit and intent of Jordan’s Principle) is available.

Table 8

Baseline	Description	Value (\$)
Fiscal year 2023-24 expenditures (Baseline 1)	Full and final Jordan’s Principle expenditures for fiscal year 2023-24. This captures status quo rules on access and significant growth in requests and expenditures.	\$1.8B
Poverty gap 2023-24 (Baseline 2)	Deprivation/poverty is a root cause of need and gaps in substantive equality in points of departure for First Nations children. An income-based poverty gap could be a proxy for a Jordan’s Principle baseline. IFSD has used the Census (2016 ²⁹) estimate of the median household income for First	\$1.3B

²⁹ Following a consultation with Statistics Canada, IFSD is using Census 2016 total median household income data with adjustments for inflation in its cost estimation, as it considers the number a more accurate (albeit imperfect) reflection of the current state of First Nations.

Total median household incomes as captured in Census 2016 and Census 2021 increased significantly for First Nations. Statistics Canada has also observed general growth in income across Canada (see Statistics Canada, “Pandemic Benefits Cushion Losses for Low-Income Earners and Narrow Income Inequality – After-Tax Income Grows Across Canada Except in Alberta and Newfoundland and Labrador,”

	Nations (on-reserve) adjusted to 2023 prices and Statistics Canada’s estimate of a Market Basket Measure (MBM) (Canada’s official measure of poverty) for remote areas to estimate the poverty gap for First Nations.	
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Table 9

Escalator	Description	Rate of growth (rounded)
Average growth rate of Jordan’s Principle expenditures (Escalator 1)	Jordan’s Principle expenditures have grown significantly over the last five years. If there are no changes to the structure or parameters of Jordan’s Principle, growth may continue. The average growth rate as an escalator would represent a continuation of growth based on the mean.	36% (see Figure 13 for total expenditures by fiscal year)
Average growth rate of Spirit Bear-related programs (Escalator 2)	Various federal programs align to the Spirit Bear Plan of closing gaps in essential services for First Nations children. Assuming Jordan’s Principle addresses gaps in these program areas, the average rate of growth in the last five years of this basket of programs could be used as an escalator to estimate growth in Jordan’s Principle expenditures. Note: The recent significant increases to the First Nations Child and Family Services Program are an exception. The program is excluded from the calculation of average growth as an outlier, as are expenditures on Jordan’s Principle.	11% (see Table 10 for programs aggregated thematically associated to the Spirit Bear Plan)
Moving average growth of GDP (Escalator 3)	Some major federal transfers such as the Canada Health Transfer and Equalization grow with an escalator equal to the moving	Various (see

Government of Canada, last updated July 13, 2022, <https://www150.statcan.gc.ca/n1/daily-quotidien/220713/dq220713d-eng.htm>).

Nationally, pandemic relief programs and other direct transfers to persons, e.g., increases to the child benefit, contributed to the income growth. While every First Nation is different, and the sources of their income changes unique, the pandemic relief programs and direct transfers were nationally available and were likely an important factor in the income growth observed for First Nations. Moreover, Statistics Canada indicated a change in Canada Revenue Agency (CRA) reporting with Form T90 for First Nations (starting in 2019) which could contribute to differences when making historical comparisons—although the size and direction of the impact is unknown.

	<p>average growth of the nominal Gross Domestic Product (GDP) in the current and past two years. Using the economic projection from the 2024 Fall Economic and Fiscal Update, escalators based on nominal GDP growth can be estimated for the next five years.</p>	<p>Table 11 for the escalator by fiscal year)</p>
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Figure 13

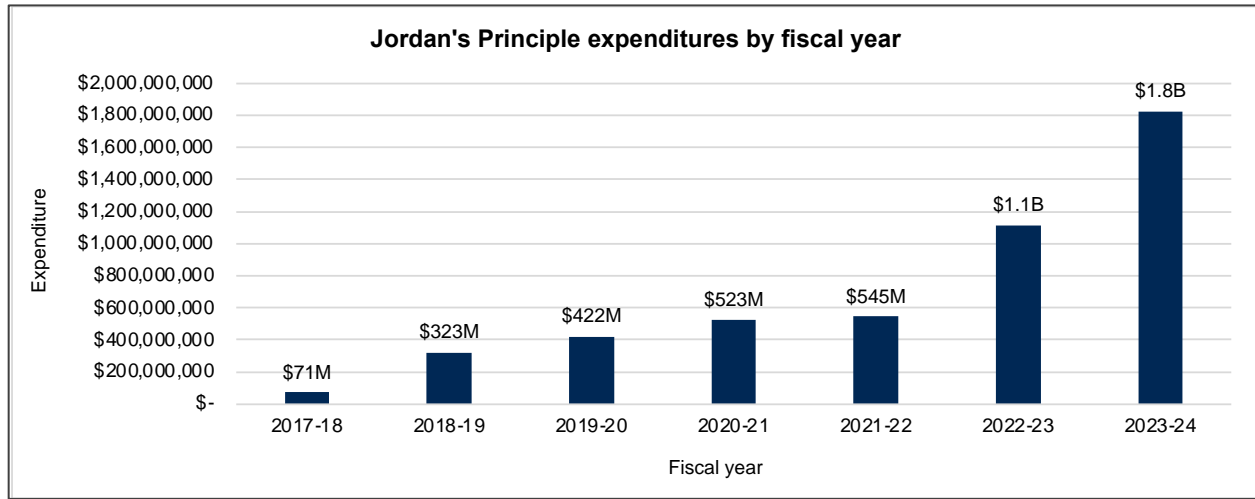


Table 10

Estimated Spirit Bear program-related expenditures (millions) by fiscal year						
	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24
Health and Mental Health (excl. infrastructure) (ISC)	\$3,437	\$3,602	\$4,284	\$4,842	\$4,840	\$5,324
Education (excl. infrastructure) (ISC)	\$2,370	\$2,390	\$2,440	\$2,650	\$3,020	\$3,100
Infrastructure (incl. housing, water, health, education) (ISC)	\$2,179	\$2,127	\$2,358	\$3,001	\$5,564	\$3,890
Income Assistance (ISC)	\$1,030	\$983	\$1,220	\$1,300	\$1,320	\$1,570
Governance (ISC and CIRNAC)	\$581	\$1,273	\$1,527	\$1,734	\$1,613	\$756
Emergency Management Assistance (ISC)	\$165	\$241	\$790	\$668	\$491	\$595
Indigenous Early Learning and Child Care Transformation Initiative (ESDC)	\$12	\$121	\$197	\$176	\$232	\$285
Other (ISC, CIRNAC, ESDC, and Department of Justice)	\$735	\$658	\$1,192	\$1,223	\$898	\$1,127
Total	\$ 10,900	\$ 11,958	\$ 14,589	\$ 16,253	\$ 19,018	\$ 18,468

Table 11

	2024-25	2025-26	2026-27	2027-28	2028-29
Escalator value (%)	6.25	3.6	4.1	4.0	4.1

The estimates with Baseline 1 and Baseline 2 vary depending on the escalator applied (Table 12). Escalator 3 presents the most modest estimates, whereas Escalator 1 and Escalator 2 generate the highest estimates across fiscal years (Figure 14 and Figure 15).

Table 12

Estimated Jordan's Principle Funding (\$ billions)							
	Fiscal year	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29
Baseline 1	Escalator 1	1.8	2.45	3.32	4.52	6.14	8.34
	Escalator 2	1.8	2.00	2.23	2.48	2.75	3.06
	Escalator 3	1.8	1.91	1.98	2.06	2.15	2.23
Baseline 2	Escalator 1	1.3	1.77	2.40	3.26	4.43	6.03
	Escalator 2	1.3	1.45	1.61	1.79	1.99	2.21
	Escalator 3	1.3	1.38	1.43	1.49	1.55	1.61

Figure 14

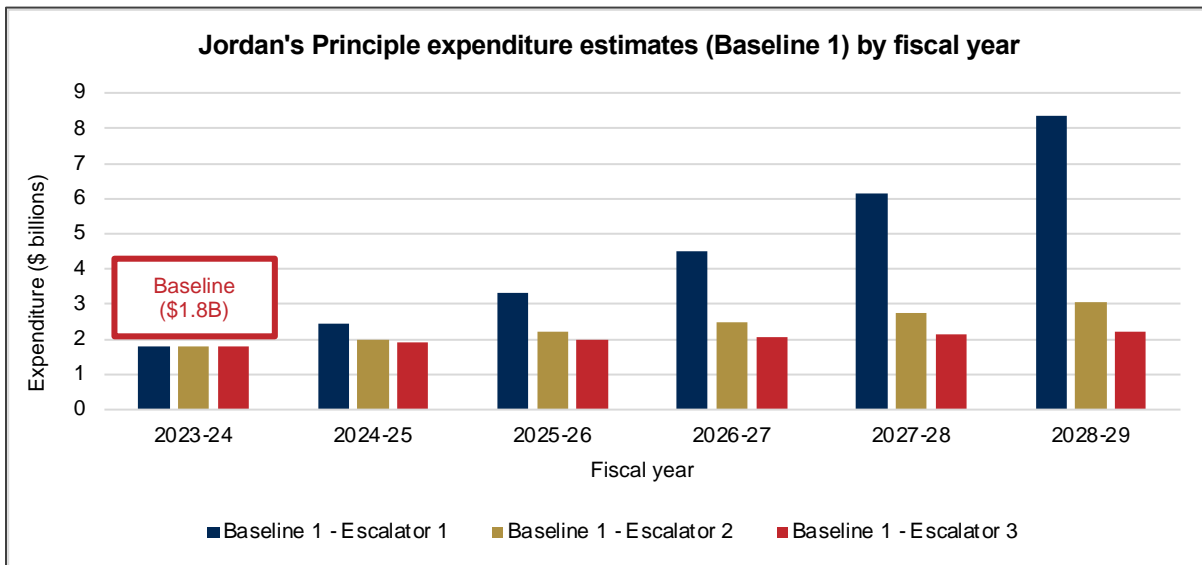
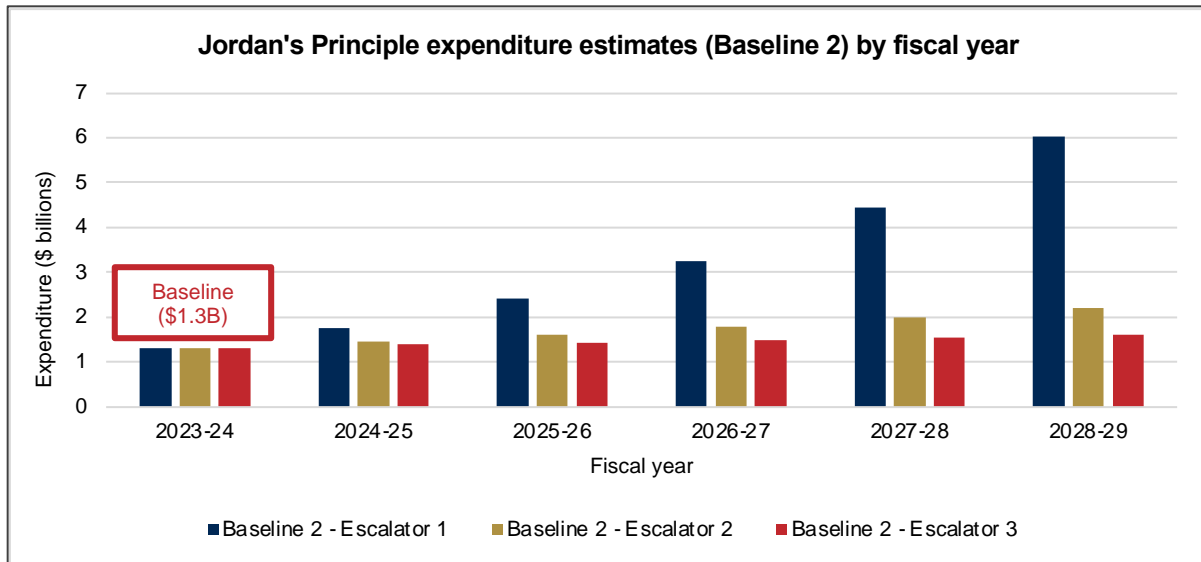


Figure 15



Clear cost-driving factors are lacking in Jordan’s Principle. There is no information that links the increase in expenditures to quantifiable factors of demand. What we know is that expenditures increased, as did the number of requests. For the sustainability of Jordan’s Principle, a baseline should be defined and capped by reasonable escalators tied to the needs of children being served by Jordan’s Principle.

Conclusion

Jordan's Principle is helping children by ensuring they have access to supports and services when they need them. There has been a consistent growth in the number of requests to Jordan's Principle across fiscal years. While Jordan's Principle is concealing gaps in other program and service areas, clarity around its operation and impacts is needed for its sustainability.

Jordan's Principle's current structure, funding, and accountability are concerning from a public finance perspective. Its administration and delivery are risks for its sustainability and the First Nations children it is intended to serve.

Data gathered by ISC is insufficient to demonstrate results for children or to identify gaps in related program areas. There is no way of knowing through ISC's information if Jordan's Principle is being administered and funded effectively to meet the needs of children. With undefined and insufficiently documented achievements, Jordan's Principle is vulnerable (as is any program) to adverse funding decisions.

Sustainability for Jordan's Principle means ensuring it can demonstrate results and value for First Nations children. This requires administrative clarity, appropriate funding, documented performance, and consistent delivery.

Recommendations for a path forward

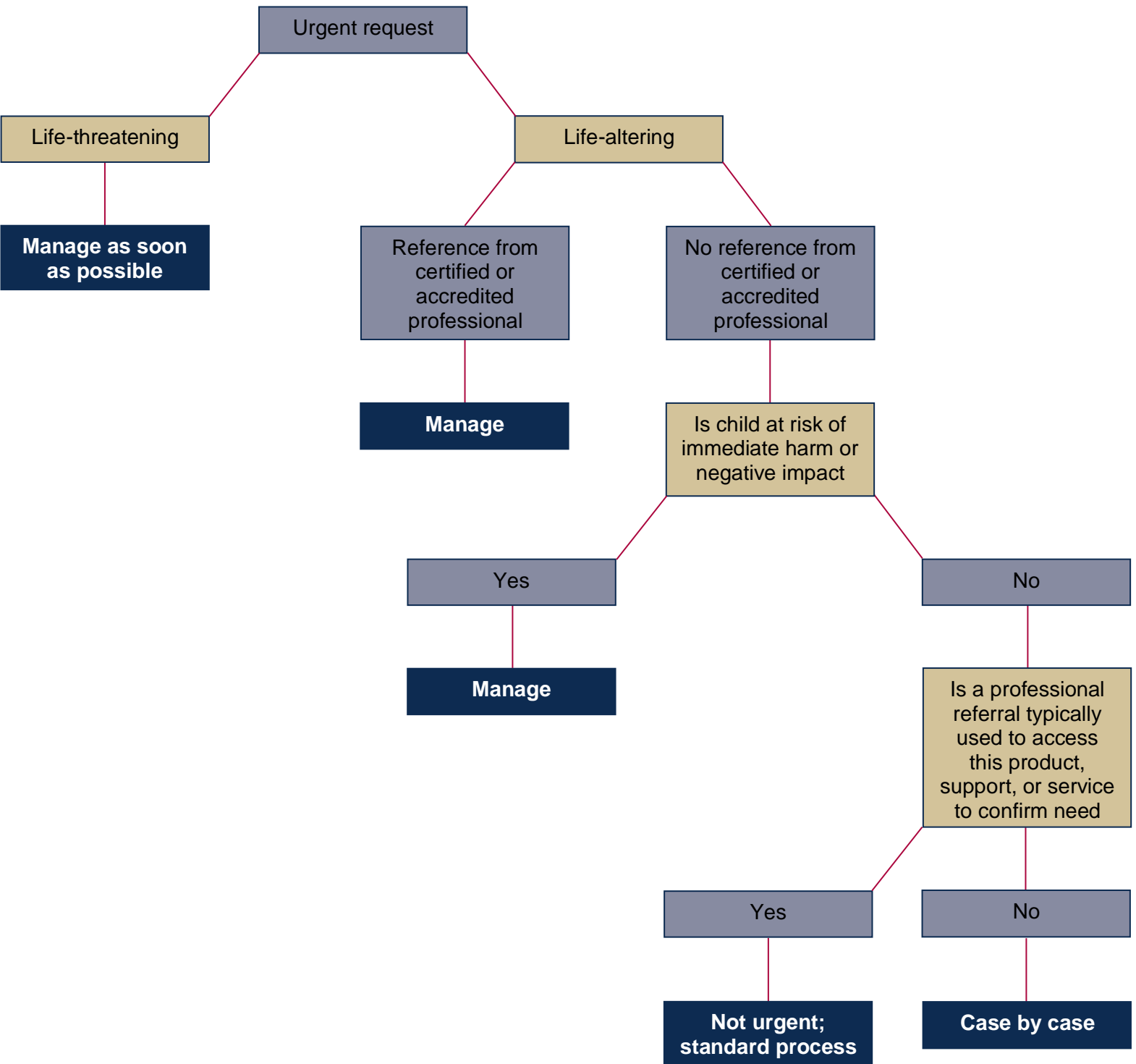
- 1) Define and adopt an alternative structure to Jordan's Principle.
A legal rule, Jordan's Principle is reliant on administrative decisions for its operations. It merits the same structural parameters that exist for other demand-driven programs in Canada, such as Employment Insurance and Old Age Security. There are options to structure Jordan's Principle to ensure its sustainable operation and funding linked to the needs of First Nations children. See pages 14-15 and 19-24.
- 2) Transition to the reformed structure.
Once a reformed structure for Jordan's Principle is defined, adopt a two-track approach to its implementation. Track 1: adopt a new data gathering framework. Track 2: leverage the data in years 2 and 3 to inform parameters and funding for Jordan's Principle. See pages 24-28.
- 3) Build consensus among practitioners and the parties to clarify Jordan's Principle's policy statement and its implementation.
There are statements, guidelines, and rules associated to Jordan's Principle through ISC's website. Lacking, however, is a clear policy statement that guides and connects the structure, delivery, accountability, and funding of Jordan's Principle. The content of a policy statement will inform the rules to govern a restructured approach to Jordan's Principle, guiding scope and parameters of activity. See pages 15-18.

- 4) Define and implement a performance framework.
With all the information gathered on Jordan's Principle, we still do not know why children are seeking support and what happens to them following an intervention. With these gaps, there is no way of assessing progress toward formal or substantive equality through Jordan's Principle. To be sustainable, Jordan's Principle's performance must be measurable and its results evidenced. A national strategic performance framework for Jordan's Principle is an essential component of a sustainable approach to Jordan's Principle. See pages 24-34.
- 5) Define and implement a national data gathering framework, aligned to the spirit and intent of Jordan's Principle.
Data on Jordan's Principle should be gathered locally, consistently, and with decency. A consistent approach to gathering child-centred data means more relevant data that can be used to measure and monitor children's needs and identify gaps in existing programs and services. See pages 28-31.
- 6) Stabilize funding for a 2-to-3-year transition period.
A baseline and escalators are essential for estimating the costs of Jordan's Principle. Available information is insufficient to estimate a bottom-up cost based on defined factors. IFSD proposes estimating the cost of Jordan's Principle on an interim basis until such time that data capture is improved to inform access parameters and costs. See pages 36-42.
- 7) Maintain the Regional Working Group.
Support the Regional Working Group (as practitioners) to continue to convene to provide input and oversight on the reform and implementation of Jordan's Principle. The contributions of the Regional Working Group are reflected throughout this report.

Appendix A

Jordan’s Principle: Urgency decision tree

The approach below is an exercise to triaging requests through Jordan’s Principle by prioritizing life-threatening cases, while still treating some non-life-threatening cases as urgent.¹



¹ Some medical professionals consider non-life-threatening conditions as urgent. J. Turnbull, G. McKenna, J. Prichard, et al., “Results from the literature review: how do policy-makers, professionals and service users define and make sense of urgent care?” in *Sense-making strategies and help-seeking behaviours associated with urgent care services: a mixed-methods study*, Southampton (UK): NIHR Journals Library; 2019 Jul. (Health Services and Delivery Research, No. 7.26.), chapter 3, <https://www.ncbi.nlm.nih.gov/books/NBK544484/>; Alberta Health Services, “Find Healthcare,” n.d., <https://www.albertahealthservices.ca/findhealth/service.aspx?id=1003853#:~:text=Medical%20care%20for%20complex%20or,Airdrie%20Community%20Health%20Centre> and Centre intégré universitaire de santé et de services sociaux de l’Estrie - Centre hospitalier universitaire de Sherbrooke, « Emergency Room Triage, » n.d., <https://www.santeestrie.qc.ca/en/care-services/general-services/emergency/triage>

Appendix B

Building better communities with Jordan's Principle Yukon First Nations Education Directorate (YFNED)

This summary text has been reviewed and approved by the interlocutor. IFSD wishes to recognize their contribution in sharing their professional experience with Jordan's Principle.

Utilizing Jordan's Principle, the Yukon First Nations Education Directorate (YFNED) has built a comprehensive approach to education related supports for youth. From the redesign of curriculum, to school-based advocates, and dedicated professional services like psychologists, YFNED is "building better communities." They have defined their own approach and actualize it by taking advantage of the lack of structure and policy framework around Jordan's Principle. It's a double-edged sword. While the flexibility suits them, it also means that criteria and funding access can change, and reporting requirements are inconsistent limiting information on how children are doing.

Context

Through group requests to Jordan's Principle with three-year transfer payment agreements and other sources, e.g., Yukon Government, Chiefs Committee, YFNED has built a comprehensive approach to education-related supports for youth.

"If Jordan's Principle wasn't doing what it's already doing, it would be catastrophic."

Working directly with individuals, families, and schools, YFNED's approach is focused on rebuilding people to make them contributing and capable members of their communities. Preventive services, intercepting trauma, and supporting young people are central to their approach. With their own psychologist and occupational therapist on staff, First Nations children connected to advocates can receive testing and supports in 30 days or less. YFNED is offering wrap-around services to help ensure children and youth get the supports they need when they need them.

YFNED's approach

YFNED has 16 advocates across primary and secondary schools in Whitehorse who serve as "the eyes and ears" of their programming. With a web-based intake form, YFNED relies on its advocates and direct requests from families to define and capture self-declared needs. Advocates work with children/youth and families to build service plans, in concert with school personnel to identify and support needs. Trained in suicide prevention, working with vulnerable youth, first aid, etc. the work of the advocates is premised on relationships with children/youth and their families.

In its work, YFNED takes a First Nation approach, as in it takes care of all First Nations children. The approach benefits from scale, since multiple First Nations children and youth from various communities can be in a single school.

YFNED's work has impacts both in the classroom and beyond. YFNED has adjusted curricula in schools to have English, social studies, careers, and art taught through an Indigenous worldview. Elders and Knowledge Keepers are included in the curriculum through activities such as drumming, hunting, dry meat making, etc. Training for youth extends beyond the classroom through the advocates who support them in obtaining driving permits, chain saw operation licenses, etc. These are skills that help to make them self-sufficient, employable, and active contributors to their communities.

Supporting children and youth at school

Program delivery is dependent on funding renewal. At the time of writing, most of YFNED's funding (approximately \$10M) comes from Jordan's Principle. Costs for program delivery are expected to rise by roughly 20%, with an administration fee (12%) included to manage growing numbers of applications and the requisite program designs.

The lack of policy framework associated to Jordan's Principle means that YFNED can utilize it to define its own vision and execute it. However, there are no consistent criteria for accessing Jordan's Principle, and there has never been an application form or template to make a request for funding. This means that submission requirements can be altered or deemed insufficient without much notice. The lack of policy framework means that there are no parameters on reporting. The result is differing approaches between service coordinators, e.g., organization like YFNED v. First Nation, due to capacity. This inconsistency limits availability of information on what children/youth are accessing and how they are being impacted.

The current approach to Jordan's Principle is a double-edged sword. The flexibility is welcome for executing on YFNED's vision and definition of success. However, guidance on the parameters of Jordan's Principle and what can be expected in the future would be helpful to support the sustainability of the education-focused supports they have developed.

Appendix C

Summary of Feedback from Frontline Jordan's Principle Workers (NAN "As We Gather" Conference, September 2024)

This summary text has been reviewed and approved by the interlocutor. IFSD wishes to recognize their contribution in sharing their professional experience with Jordan's Principle.

During the "As We Gather" conference hosted by Nishnawbe Aski Nation (NAN), frontline workers provided critical feedback on their experiences with Jordan's Principle, highlighting operational challenges and suggesting reforms that could enhance delivery.

Participants shared that their day-to-day responsibilities often extended beyond their official titles, as they acted as frontline coordinators, advocates, and support systems for families navigating Jordan's Principle.

Operational Challenges

Participants raised several significant operational challenges, many of which aligned with feedback gathered from the national working group:

Unclear Processes & Onerous Reporting Requirements: Frontline workers pointed out that ISC processes were opaque, particularly when accessing service coordination funding. Reporting requirements were described as inconsistent, burdensome, and often irrelevant to the real needs of the community (e.g., requiring forms to be typed rather than handwritten, but requiring a non-electronic signature)

Inconsistent Funding Affecting Staffing: A recurring issue was the inconsistent year-to-year funding, which disrupted the ability to maintain functional, community-based teams. The lack of stable funding meant that fully operational teams would be disbanded due to non-renewal of funding, affecting continuity of service delivery.

Eligibility Confusion & Arbitrary Decisions: Workers reported confusion and inconsistencies in eligibility criteria, as communicated by ISC. Identical applications would receive different outcomes, leading to frustration. ISC decisions were described as arbitrary, dismissive, and ill-informed. One participant said "it feels like ISC isn't reading our applications." Participants also mentioned instances of "subtle racism," with bureaucrats dismissing requests based on vague justifications (e.g., "the child has had enough services").

Bureaucratic Delays & Backlogs: Frontline workers expressed frustration over long wait times and backlogs, raising questions about why ISC wasn't hiring more adjudicators, especially given the growing demand. This highlighted the need for capacity building in data management and processing.

On-Reserve vs. Off-Reserve Funding Inequities: Many participants felt that funding systems were discriminatory based on location, with on-reserve and off-reserve children facing different levels of access and support. This highlights the issue of location-based inequity, and the need for disaggregated data by territory to better understand regional disparities.

Suggestions for Improvement

Frontline workers proposed several ideas and considerations for reform.

Simplifying Processes & Forms: A strong desire for simplifying the application process was expressed, with suggestions to eliminate complex forms that often used inaccessible language. Workers suggested a single-window approach with to streamline requests. This could also include standardized software, and more consistent administrative systems and data infrastructure.

Ending Reimbursement: Participants were particularly vocal about the challenges of reimbursement, saying that it unfairly burdened families who often had to float costs before receiving approval. They suggested moving towards a system where deposits or upfront payments are made. This highlights a gap in service consistency, where some requests are approved right away, and others take months or years.

Community-Based Staffing & Decision-Making: Many expressed that the decision-making process should be localized, with staffing for Jordan's Principle coming from the communities themselves. This would ensure that those making decisions are familiar with local realities, and support First Nations-led data collection and community control over information.

Consistency in Adjudication & Service Delivery: Participants advocated for greater consistency in adjudication and improved communication, suggesting that ISC assign specific staff to communities to develop expertise in local contexts. This could also be addressed by adopting uniform guidelines and clear accountability structures.

Data Collection & Reporting

Participants raised concerns around lack of consistent data collection practices and the burdensome nature of reporting. They highlighted that data gathered from frontline workers and Jordan's Principle coordinators could better reflect real needs and improve service planning. However, current systems were not user-friendly, with excessive bureaucracy hindering the process.

There were suggestions for simplified community-based data gathering, where frontline workers could provide concise reports based on their local knowledge without the need for onerous forms.

Appendix D

Sustainability and the Spirit of Jordan's Principle

This summary text has been reviewed and approved by the interlocutor. IFSD wishes to recognize their contribution in sharing their professional experience with Jordan's Principle.

Service Coordinator X serves 7 First Nations officially, but nearly 30 in practice, plus two First Nations child and family services agencies. In their work with Jordan's Principle, Service Coordinator X is concerned that Jordan's Principle is creating a reliance on temporary solutions without building capacity and resilience in families. Service Coordinator X considers a return to the spirit and intent of Jordan's Principle to be the meaningful support of children and families by focusing on needs, building resilience in families, and providing tools for sustainable well-being.

Operationalizing Jordan's Principle

Working in a team of three (including themselves), Service Coordinator X has built an approach to managing applications and floating, i.e., funding, some requests through Jordan's Principle. Every application is reviewed by Service Coordinator X to connect families with relevant supports and services. Through this approach, Service Coordinator X seeks to "extend beyond the 'cash' for basic needs, to build capacity with the family."

For instance, there are several requests for groceries. Instead of only approving the request, Service Coordinator X asks what will happen next. Receiving grocery money may help in the short-term, but how will the applicant get groceries in three or six months? If the applicant's circumstances are otherwise unchanged, will they be applying again? Will they rely on Jordan's Principle indefinitely? While recognizing the often serious nature of requests for basic necessities, Service Coordinator X works with applicants to lessen reliance on Jordan's Principle funding. Instead of routinely approving grocery requests, Service Coordinator X seeks out options that build community capacity. This could include:

- Pairing applications with already available programs and services;
- Making a group request to fund a local food bank and build long-term food security in a community; or,
- Working with applicants to get coaching on budgeting and managing personal finances to ensure they can live within their means.

The active support and work alongside families and the use of group requests for commonly occurring requests are meant to build resilience and capacity so that Jordan's Principle offers a step forward rather than being a form of dependence.

There are few parameters for the delivery of Jordan's Principle. Service Coordinators are left to apply their judgement in supporting applications. This has resulted in Service Coordinator X developing their own scales and frameworks for applicants. The need for

parameters in Jordan's Principle has made effective communication with applicants a critical part of Service Coordinator X's work. Some applicants may come in with a preconceived idea about funding (i.e., my neighbour got a laptop through Jordan's Principle, so I should too). Service Coordinator X handles this by framing applications through a lens of *wants* versus *needs*. For example, an applicant may want a king-size bed for their child, but only need a twin bed, given the child's height and age. Service Coordinator X is careful so as not to be seen as gatekeeping, but rather works in partnership with applicants to understand their unique needs. This approach builds trust through respect of the applicants and their abilities, and is also supported by the tribal council employing Service Coordinator X.

With one service coordinator, one family support worker (a position funded through Jordan's Principle), and one administrator (to manage payments and track applications), the team often burns out. They are regularly serving well above the 7 First Nations in their mandate, serving nearly 30 First Nations at certain times.

Flourishing Jordan's Principle

Service Coordinators can be helpful as trained professionals (e.g., social workers, nurses) in building capacity and connecting families to available services. A return to these original functions, rather than the churn of reviewing applications would support the spirit and intent of Jordan's Principle by supporting families in creating meaningful and sustainable change.

The limited guidance on the implementation of Jordan's Principle has led to significant variability between regions. Guidance and guidelines would be helpful for assessing reasonableness in different places, e.g., urban versus remote, and for the types of requests, e.g., helping to decipher *needs* versus *wants*. Approving everything that applicants want, can and does lead to abuses. For example, applicants may receive money for groceries, and spend it on a vacation. Or they may be approved for household furnishings, and immediately sell them. While they may be the exception, it is crucial to limit these abuses for the long-term success of Jordan's Principle.

Unifying the Jordan's Principle application process across all regions could lessen the impetus for complaints or misinterpretations about what Jordan's Principle is for and how it should operate. Process parity could also lead to greater clarity for applicants and practitioners. In turn, clarity and parity allow for easier evaluation, ensuring that Jordan's Principle is operating as intended.

Appendix E

First Nation X

This summary text has been reviewed and approved by the interlocutor. IFSD wishes to recognize their contribution in sharing their professional experience with Jordan's Principle.

First Nation X is a self-governing First Nation operating a Jordan's Principle pilot program. The program has one Jordan's Principle Navigator, and is looking to hire a second. The program is currently in development and is scheduled to be fully operational by the end of 2024.

Key takeaways

1. **Customized Case Management:** First Nation X develops customized wrap-around plans, building capacity within families and caregivers to address long-term needs and improve outcomes. The program addresses diverse needs, including emergency accommodation, addiction treatment, bedroom furniture, educational support, and respite care.
2. **Gap Filling:** Jordan's Principle is filling service gaps to help meet the basic needs of vulnerable individuals.
3. **Success: Leveraging Existing Systems:** First Nation X has modeled its Jordan's Principle program on existing systems within its First Nation. This allows it to leverage work that has already been completed, i.e., for budgeting, HR, etc.
4. **Success: Group Proposals:** The program has secured significant funding through group proposals, allowing First Nation X to staff its pilot program adequately.
5. **Challenge: ISC processes:** Delayed and inconsistent decisions from ISC cause problems. First Nation X may have to pay for services while awaiting a decision.

Operationalizing Jordan's Principle: A Pilot Program

First Nation X is running a Jordan's Principle pilot program to address what citizens and staff described as barriers to accessing equitable services. This pilot is overseen by First Nation X's Justice department and aims to streamline services, reduce wait times, and enhance case management for families accessing Jordan's Principle.

The program is still in its development phase, focusing on establishing protocols, training navigators, and standardizing practices. Once fully implemented, it aims to offer comprehensive support across all of First Nation X's service delivery departments.

As of the time of writing, First Nation X has been approved to be a Jordan's Principle Service Coordinator, with funding for 2 navigators, 1 intake/administration worker and half of the wages for a manager. First Nation X is working to secure the remaining wage funding for the manager through Post Majority Support Services (PMSS).

First Nation X also completed a service agreement with ISC to fund necessities of life like grocery support, emergency rent and housing, clothing, winter clothing, utilities/heating and prenatal supports.

The needs being addressed through Jordan's Principle are diverse (e.g., emergency accommodation, addiction treatment, educational support, bedroom furniture, sports fees, etc.). First Nation X's approach to Jordan's Principle reflects a commitment to providing holistic support, by first addressing immediate needs, and then building capacity within their community to foster long-term well-being.

First Nation X decided to establish their own Jordan's Principle Navigator due to several issues with the existing service delivery model:

1. **Fragmentation of Service Delivery:** Citizens were experiencing fragmented supports and services, making it challenging to navigate multiple systems for support and relief. This fragmentation was not in the best interest of the families and added to the burden of developing sound, customized wrap-around supports and services.
2. **Barriers to Access:** Citizens reported feeling barriers were being put in place to access equitable service delivery. Specifically, there were instances where citizens experienced a "no" before their application was even submitted. Largely, this was caused by requests being outside the scope of Jordan's Principle i.e., not for the well-being and benefit of the child.
3. **Longer Wait Times:** At the time of implementation, First Nation X had only identified one service coordination organization that their citizens could access (Regional Organization Y). Regional Organization Y served a larger community than just First Nation X, resulting in longer wait times for citizens to access Jordan's Principle funding.
4. **Lack of Appeal Process:** Citizens had no clear avenue to appeal applications and did not understand how to re-apply or modify their applications. This led to frustration, as citizens felt their needs were not being adequately met.

First Nation X is seeking funding for a variety of supports and services through Jordan's Principle to enhance their programming and services. Some of these include:

1. **Staffing and Program Costs:** First Nation X is seeking funding for various positions, such as Jordan's Principle Navigators, and for programming costs related to their Justice teams, Youth Outreach, and Youth Recreation teams. They are also developing a Necessities of Life program and other group proposals for specific needs like winter clothing.
2. **Capital:** First Nation X is submitting applications to recover costs on several capital purchases that enhance their on-the-land programming, e.g., trucks, trailers, river boats, and snowmobiles. They are also working on constructing additional office space and developing outdoor gathering and recreation hubs.

- 3. Support for Individual Requests:** This includes emergency and medical travel, bedroom furniture for children, food and fuel subsidies, emergency accommodation, addictions treatment, respite support, private caregiver expenses, sports fees and equipment, educational supports, and emergency utility payments.

To manage cash flow for urgent requests, First Nation X uses its prevention dollars. This involves assuming the financial risk of covering these costs upfront, with the expectation that they will be reimbursed by Jordan's Principle later. They have developed tracking and reimbursement mechanisms to manage this process.

ISC approval decisions are often significantly delayed and can be inconsistent. Some applications may be approved quickly, while others take months. When asked about challenges, a Jordan's Principle Navigator from First Nation X offered the following:¹

What I find the most challenging is how long it takes to get a decision back from [ISC]. Since I have started (February 2024); I have not received a decision back from [ISC] from the 23 applications I have submitted. I have only received approvals from the previous Navigator's submissions; some of those applications were submitted as far back as August 2023. When I do a follow-up email to [ISC] regarding the applications I have sent they respond within 1-2 business days providing an ISC# but the application will be pending approval.

In addition, I think [ISC] assumes that [First Nation X] will just cash flow the supports for our clients. When I have submitted my own application personally; I received an approval 2 days after I submitted my application.

I just got off the phone with CLIENT 1 (she wanted a follow-up done on her application) however, she told me her sister submitted an application on her own and she received an approval quite quickly as well.

First Nation X highlighted challenges with delayed decision-making in Jordan's Principle applications, alongside instances of quicker approvals for individual submissions. The variability in processing time causes uncertainty for both applicants and staff. It reflects ongoing inefficiencies and disorganization with ISC's processes.

Additionally, ISC assumes First Nation X will be financially responsible for client supports while awaiting a decision. A unified approach (parity of process across all regions) to Jordan's Principle applications could help alleviate concerns over financial responsibility, and give greater clarity to applicants about what will and will not be covered.

First Nation X is developing their approach to operations and planning. This includes:

¹ Quotes have been edited for clarity, but have not been substantively altered.

1. **Integration with Other Services:** First Nation X is aligning the development of their Jordan's Principle program with their Post-Majority Services Program, which replicates the same financial tracking, bill backs, and cash flowing processes.
2. **Leveraging Cost Information:** First Nation X uses detailed cost information from their current operations to inform and support their funding proposals. This helps them to project and anticipate costs for future service delivery and program development.
3. **Data Management:** First Nation X has purchased a database/case management system to use as a tool for managing cases and tracking requests.

Responding to citizens' concerns about fragmented service delivery, First Nation X is integrating their approach to Jordan's Principle. While their development of an approach is ongoing, they are integrating services and activities, and using their own cost analysis to inform proposals. They utilize Jordan's Principle funding to support positions responsible for coordinating both Jordan's Principle and general program and service delivery. As their work continues, First Nation X is encountering challenges and disruptions due to the inconsistent management of Jordan's Principle by ISC.

Appendix F

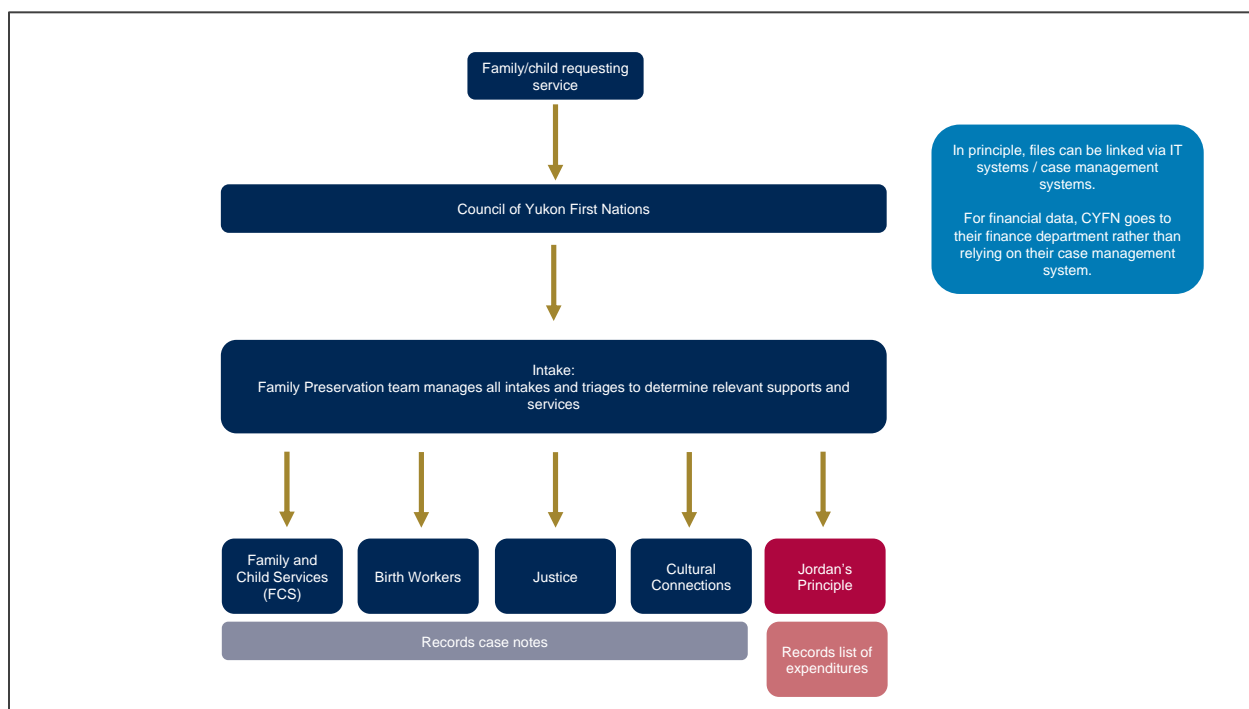
Jordan's Principle Service Coordination Council of Yukon First Nations (CYFN)

This summary text has been reviewed and approved by the interlocutor. IFSD wishes to recognize their contribution in sharing their professional experience with Jordan's Principle.

The Council of Yukon First Nations (CYFN) built their own approach for the operationalization of Jordan's Principle. With an intake process, expenditure tracking, and case management system, CYFN is documenting how Jordan's Principle is being used to address the root causes of need.

CYFN is an urban-based service provider in child and family services, and the first Jordan's Principle service coordinator in the territory. An increase in requests led the CYFN Family Preservation Services team to build their own programs utilizing Jordan's Principle. The programs allows CYFN to triage requests, track outputs and provide culturally appropriate wrap around services.

Any family seeking support from Family Preservation Services goes through a general intake process. During intake, the family is asked to provide basic information about their needs, context related to their child and family, income sources, as well as their family goals.



Once the intake process is complete, a referral to one or more of the units and respective teams: Client Services; Prenatal and Infant Supports; Programming; Jordan's Principle.

Due to the significant volume of incoming requests, CYFN developed internal eligibility criteria and established parameters by which a family may access Family Preservation Services resources and supports. More specifically, five assessment criteria were defined:

- 1) Children with complex needs
- 2) Children living in poverty
- 3) Children/families who have emergencies
- 4) Family connections/reunification
- 5) Cultural connections

If a family does not meet the established criteria, CYFN directs them to complete and submit their application to ISC directly.

In fiscal year 2023-2024, CYFN was provided a contribution agreement for a “float” to cashflow approved Jordan’s Principle supports and services. This allowed CYFN to receive funds up from and to request ISC directly for additional resources. This was reduced barriers for supports and services for children.

With its intake and tracking process, including expenditures associated to Jordan’s Principle, CYFN is building its own data set to capture requests. From its internal analysis, approximately 70% of all intakes are for Necessities of Life (NOL) requests associated to poverty specifically food, clothing and housing. CYFN leverages this information to build supporting wrap around programs and services.

To equip families with skills and tools, CYFN established a requirement to attend workshops to remain eligible for the NOL supports. For instance, families are asked to complete courses, whether delivered through CYFN or their First Nations, on topics such as budgeting, parenting, cultural programming, etc. If a family chooses not to attend, they are directed to apply directly to Jordan’s Principle, rather than receiving the supports through Family Preservation Services.

CYFN established the structured approach to protect and promote the integrity of Jordan’s Principle. There are different service coordination approaches that may apply rules differently across the country, which do not always reflect the spirit and intent of Jordan’s Principle. As with any service provision, not all families are pleased with CYFN’s approach. However, CYFN advocates that its current approach supports families who are most in need, while offering them ongoing opportunities to build and strengthen family skills. The goal is to provide families the skills to strength protective factors and prevent involvement with the child welfare system. To attain this set goal, root causes of need must be addressed.

The outwardly seamless approach (i.e., where a family can ask for support without specifying the type of support they are seeking) requires internal coordination and a well-functioning administration. CYFN’s approach helps clients navigate services with independence. Administering Jordan’s Principle entails a significant administrative

burden. In fact, documenting requests, expenditures, issuing cheques and purchase orders etc. are time intensive, and this strains capacity within Family Preservation Services. There is also a need to monitor potential misuse of funds, as may be the case if, for example, families sell the purchased products. While this remains an exception, this type of misuse can be damaging to Jordan's Principle overall, especially as CYFN expects that an evaluation will be carried out in the future and long term reforms.

A forward strategy for Jordan's Principle

To make Jordan's Principle more effective for children and families, CYFN focuses on defining and quantifying needs. Knowing the community is crucial to determining appropriate eligibility and effectively assessing requests. A block of funds allocated based on the identified needs within the served community could be allocated to a service coordinator like CYFN. CYFN would then be accountable for the use of the funds, while documenting requests and outcomes.

Pilots on operationalizing Jordan's Principle in different settings could be instructive, namely in urban versus on-reserve settings, with regional versus First Nation-led administration. These exercises could help define costs, areas of need, approaches, and successful strategies to support families seeking supports through Jordan's Principle.



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du Canada

[Canada.ca](#) › [Indigenous Services Canada](#) › [Indigenous health](#)

› [Health care services for First Nations and Inuit](#) › [Jordan's Principle](#)

Submit a request under Jordan's Principle

Important

If a child needs **immediate** care, please call 911 or your local emergency services number, or visit the nearest health facility.

Urgent requests

If you have an urgent request that meets the following interim criteria, please contact the Jordan's Principle Call Centre at [1-855-JP-CHILD](tel:1-855-JP-CHILD) ([1-855-572-4453](tel:1-855-572-4453)). This could include:

- life threatening cases
- cases involving end-of-life or palliative care
- risk of suicide
- risk to physical safety
- no access to food or basic necessities
- risk of entering the child welfare system
- caregivers and children fleeing from domestic violence

This interim criteria of urgent was clarified by the Canadian Human Rights Tribunal in its November 21, 2024 summary ruling.

Requests are reviewed on a case-by-case basis and there may be some time-sensitive requests that are urgent, but are not covered by the above.

Urgent requests for products, services or supports under Jordan's Principle must be directly linked to the child's urgent circumstances.

On this page

- [What is covered](#)
- [Who is covered](#)
- [Who to contact](#)
- [Who can send requests](#)
- [How to send a request](#)
- [Processing requests](#)
- [Reimbursements](#)
- [How to appeal decisions](#)
- [For more information](#)



Available 24 hours, 7 days a week

- Jordan's Principle Call Centre: [1-855-JP-CHILD \(1-855-572-4453\)](tel:1-855-JP-CHILD)
- teletypewriter: [1-866-553-0554](tel:1-866-553-0554)

What is covered

Jordan's Principle responds to unmet needs of First Nations children no matter where they live in Canada.

Different levels of government fund different services for First Nations children. As a result, it can be hard to figure out how to access necessary products, services and supports.

Under Jordan's Principle, we can:

- inform families about the help available for their child and how to access it
- coordinate access to products, services and supports
- provide funding when it's needed to make sure products, services and supports are accessed without delay

What is funded

Each child's situation is unique. Please confirm coverage in advance with your [regional focal point for Jordan's Principle](#).

Funding can help with a wide range of health, social and educational needs, including the unique needs that First Nations Two-Spirit and LGBTQIA children and youth and those with disabilities may have. Some examples of what has been funded under Jordan's Principle include:

Health

- mobility aids
- wheelchair ramps
- addiction services
- services from Elders
- mental health services
- specialized hearing aids
- traditional healing services
- services for children in care
- assessments and screenings
- transportation to appointments
- medical supplies and equipment
- long-term care for children with specialized needs
- therapeutic services for individuals or groups (speech therapy, physiotherapy, occupational therapy)

Social

- social worker
- land-based activities
- personal support worker
- specialized summer camps
- respite care (individual or group)
- specialized programs based on cultural beliefs and practices

Education

- school supplies
- tutoring services

- teaching assistants
- specialized school transportation
- psycho-educational assessments
- assistive technologies and electronics

Who is covered

On November 25, 2020, the Canadian Human Rights Tribunal (CHRT) released a ruling about Jordan's Principle eligibility. A child under the age of majority in their province or territory of residence can access Jordan's Principle, if they permanently reside in Canada and if the child meets one of the following criteria:

- is registered or eligible to be registered under the *Indian Act*
- has one parent or guardian who is registered or eligible to be registered under the *Indian Act*
- is recognized by their nation for the purposes of Jordan's Principle
- is ordinarily resident on reserve

The eligibility above replaces the CHRT interim motion ruling of February 2019.

To find out more about how to confirm with a First Nations official that a child is recognized by their nation (for the purposes of Jordan's Principle), contact your [regional focal point for Jordan's Principle](#) or the [Jordan's Principle Call Centre](#).

If you are a First Nations leader or official, looking for more information about what this means to your nation, please contact your regional office or [regional focal point for Jordan's Principle](#).

Ordinarily resident on reserve means that an Indigenous child:

- lives on reserve
- normally lives on reserve even if the child or one of the members of their household (such as a sibling, parent, extended family living with child) may have been required to spend some time away temporarily from the community to access services such as health care or education where there are no other comparable services available in the community
- was ordinarily resident on reserve immediately prior to accessing Jordan's Principle
- is a dependent of a family that maintains a primary residence on reserve
- returns to live on reserve with parents, guardians or caregivers during the year, even if they live elsewhere while attending school or to receive medical care or other services
- meets student eligibility requirements in Yukon Territory

A child taken into care of a Child and family services agency or into a kinship or informal agreement is considered ordinarily resident on reserve where:

- the child's parent or guardian lived on reserve at the time the child was taken into care
or
- a child goes into the care of a guardian who lives on reserve

Requests for Inuit children can be made through the [Inuit Child First Initiative](#).

Please [contact us](#) if you're not sure how to help an Indigenous child who needs access to products, supports and services.

Who to contact



Update

Requests for access to products, services and supports for Inuit children through the Inuit Child First Initiative can also be sent to the regional focal points listed on this page.

Update: On September 6, 2019, the Canadian Human Rights Tribunal (CHRT) released a decision related to compensation for certain individuals under Jordan's Principle. This is a complex decision which the Government of Canada is reviewing. Although you may have questions about this, **the 24/7 Jordan's Principle toll-free line and regional contacts, are intended to help with requests for products, services and supports, and not for requests related to the CHRT order of compensation of individuals.**

For more information:

- [The Government of Canada's assessment of the Canadian Human Rights Tribunal's ruling on compensation](#)

Contact us to:

- get more information about Jordan's Principle
- request funding for a product, service or support
- get copies of forms
- seek reimbursements
- start an appeal

You can reach us through:

- Jordan's Principle focal points across Canada
- local service coordinators for First Nations communities

Regional focal points across Canada

If you can't reach a regional focal point or you are seeking assistance after the listed business hours, please contact the [Jordan's Principle Call Centre](#).

Expand all

Collapse all

▼ National Office

Monday to Friday 8:00am to 4:00pm Eastern time

Indigenous Services Canada

JPCaseMgt-GestCasPJ@sac-isc.gc.ca

▼ Atlantic Region (New Brunswick, Newfoundland , Nova Scotia, Prince Edward Island)

Monday to Friday 8:30am to 4:30pm Atlantic time

For requests:

[1-833-652-0210](tel:1-833-652-0210)

principedejordanatl-jordansprincipleatl@sac-isc.gc.ca

For payment inquiries:

jordansprincipleatl_finance-principedejordan@sac-isc.gc.ca

▼ Quebec

Monday to Friday 8:00am to 4:00pm Eastern time**For requests:**

1-833-725-7236

principedejordan-qc-jordanprinciple@sac-isc.gc.ca

For payment inquiries:

principedejordanfacturation-qc-jordanprincipleinvoicing@sac-isc.gc.ca

▼ Ontario**Monday to Friday 8:00am to 4:00pm Eastern time****For requests:**

1-833-442-2429

jordansprincipleon-principedejordan@sac-isc.gc.ca

For payment inquiries:

1-833-442-2429

principedejordanfinance-on-financejordansprinciple@sac-isc.gc.ca

▼ Manitoba**Monday to Friday 8:00am to 4:00pm Central time****For requests:**

1-833-725-8807

jordansprinciplemb-principedejordan@sac-isc.gc.ca

For payment inquiries:

fnihbfnihmbrjp-spnirmbdgpni@sac-isc.gc.ca

▼ Saskatchewan

Monday to Friday 8:00am – 4:00pm Central time

For requests:

[1-833-752-4453](tel:1-833-752-4453)

principedejordansk_admission-jordansprinciplesk_intake@sac-isc.gc.ca

For payment inquiries:

[1-833-752-4453](tel:1-833-752-4453)

jordansprinciplesask_finance-principedejordan@sac-isc.gc.ca

▼ Alberta

Monday to Friday 8:00am to 4:00pm Mountain time

For requests and payments:

[1-833-632-4453](tel:1-833-632-4453)

jordansprincipleab-principedejordan@sac-isc.gc.ca

▼ British Columbia

Monday to Friday 8:00am to 4:00pm Pacific time

For requests:

[778-951-0716](tel:778-951-0716)

principedejordancb-bcjordansprinciple@sac-isc.gc.ca

For payment inquiries:

778-951-0716

paiementsprincipedejordancb-bcjordansprinciplepayments@sac-isc.gc.ca

▼ Northern Region - Yukon, Northwest Territories and Nunavut

Monday to Friday 8:00am to 4:00pm Eastern time

For requests:

1-866-848-5846

principedejordanrn-nrjordansprinciple@sac-isc.gc.ca

For payment inquiries:

1-866-848-5846

principedejordanfinancern-nrfinancejordansprinciple@sac-isc.gc.ca

Who can send requests

A request for a child or children in the same family or with the same guardian can be submitted by:

- a parent or guardian of a First Nations or Indigenous child who ordinarily resides on reserve
- a First Nations, or Indigenous child who ordinarily resides on reserve, at the age of consent in their province or territory of residence. A child at the age of consent can make decisions on their own about the care they need. Age of consent varies by province or territory.
- an authorized representative of the child, parent or guardian

- written or verbal consent must be provided by the parent or guardian

An authorized representative is an individual or business that the requester has given authorized, written permission to act on their behalf with respect to a Jordan's Principle request.

A request for a group of children from multiple families or guardians can be submitted by:

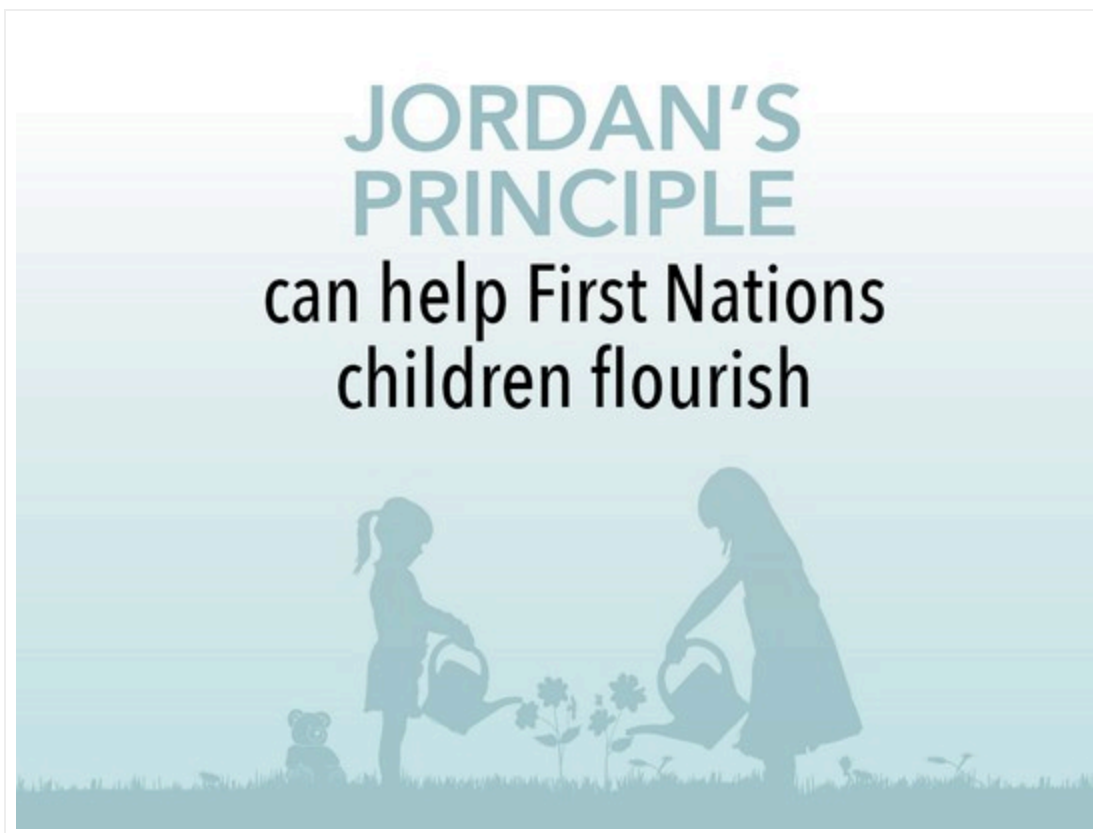
- a parent or guardian of First Nations or Indigenous children who ordinarily reside on reserve
- a community or Tribal Council
- a community organization or institution
- a service coordinator, navigator or case manager

They can request products, services and supports, such as:

- respite care
- wheelchair ramps
- support programs
- educational assistants
- transportation to school
- local therapeutic specialists

How to send a request

Contact us through our call centre, open 24 hours a day, 7 days a week, or your regional focal point to start your request to access services through Jordan's Principle.



The call centre or your regional focal point can provide copies of the forms to start a request or assist you with filling them in.

You can also obtain copies of the forms by clicking and downloading:

- [Individual or family request form](#)





How to open the PDF forms

These forms won't open on a mobile device, you will need a computer.

Don't double-click the PDFs. Right click instead.

To access these PDF forms:

1. Install [Adobe Reader 10+](#)  or an alternate reader if you don't already have one
2. [Download and save the PDF file to your computer](#) 

3. Right click on the PDF file you have saved on your computer, select "Open with", choose your PDF reader

We want to make the application process as easy to understand as possible.

Having certain information ready when you contact us can help if you are seeking access to products, services or supports. We start by working with you to gather the basic information to make the request.

To help us confirm the child's eligibility, we may need one of these:

- name, date of birth or registration number of a First Nations child or parent who is registered under the *Indian Act*
- name and date of birth of a First Nations child or parent who is not registered but is entitled to Indian status under the *Indian Act*
- documents confirming a child ordinarily lives on a reserve
- confirmation that your child is recognized by their First Nation for the purposes of Jordan's Principle – visit Confirmation of recognition for more information
 - as a parent or guardian, you could provide a copy of the Confirmation of recognition form completed by a First Nation's designated or deemed official
 - you can also choose to provide consent to Indigenous Services Canada to seek confirmation of recognition from your First Nation on your behalf by completing the Consent to communicate form
 - if you are a service coordinator, a First Nations leader or official looking for more information about what this means to your First Nation, visit Confirmation of recognition

Contact us to obtain copies of these forms.

You will also need to send in a document that shows how the requested product, service or support meets the child's identified health, social or educational need. This document could be from an Elder, knowledge keeper or professional in that field of expertise.

Each request is determined based on the best interests of the child, substantive equality and culturally relevant service provision. If you are unsure of what you should submit, visit [document needed for a request](#) or contact your [regional focal point](#).

If you are seeking reimbursement, follow the steps listed in [Step 7. Reimbursements](#).

Processing requests

The [Jordan's Principle regional focal point in your area](#) will review the completed request. A decision will be sent to you in writing after the request is processed.

How long it takes to process a request

Requests for a child or children in the same family or with the same guardian:

- **urgent requests** (the child's current health or safety is a concern) are processed within 12 hours of receiving all necessary information
- all other requests are processed within 48 hours of receiving all necessary information
 - if we do not have enough information to confirm the type of product, service or support the child needs, more time may be necessary to get this information; however, if the child requires

an assessment of their need(s), this can be paid for immediately under Jordan's Principle

Requests for a group of children from multiple families or guardians:

- **urgent requests** are processed within 48 hours of receiving all necessary information
- all other requests are processed within 1 week of receiving all necessary information

Approved requests are managed in 1 of 2 ways:

1. where possible, we arrange for the products, services or supports to be provided directly to the child, or children. In these situations, there is no cost to the family, guardian, child or authorized representative and reimbursement is arranged directly with the service provider or vendor
2. if the family, guardian, child or authorized representative has already paid for the approved product, service or support, then reimbursement of these expenses will be provided

Denied request

If your request is denied, you may appeal the decision up to 1 year from the date the request was denied.

Reimbursements

Each child's situation is unique. For this reason it is important to confirm coverage in advance with your Jordan's Principle regional focal point.

Reimbursement may be provided if the approved product, service or support has already been paid.

Requesting a reimbursement

A reimbursement form is needed:

- to request reimbursement for costs already paid
- for service providers and vendors to request direct payment for services rendered

Follow these 3 steps to request a reimbursement:

1. contact us so we can help you start the process and confirm that the product, service or support will be funded
2. complete a reimbursement form. We can send you the form and help you fill it in
3. send the completed reimbursement form to the Jordan's Principle regional focal point in your area and include all relevant supporting documents

Receiving the payments

Requests for a child or children in the same family or with the same guardian:

- the parent or guardian normally gets the payment if the child is under the age of majority in their province or territory of residence
- children over age 16 may get the payment if they submitted the request
- a vendor or service provider may be paid directly

Request for a group of children from multiple families or guardians:

- payment will be made to the community or group that made the request
- vendors or service providers may be paid directly

How to appeal decisions

Appeals to decisions under Jordan's Principle can be sent to regional focal points across Canada. They will help you start the appeal and work with you throughout the process.

If a request is denied, the requester may appeal the decision within **1 year** of the date of denial. To do so, they must send in a written request to their regional Jordan's Principle focal point.

At a minimum, the request for appeal must contain:

- the child's name and date of birth
- the product or service requested
- the date of denial and a copy of the Jordan's Principle denial letter (if available)

Although it is not required to begin an appeal, you may also include additional information, such as:

- assessments
- information showing that the request will help ensure:
 - substantive equality.
 - access to a culturally appropriate service
 - meet the best interests of the child

New or additional information is not needed in order to start an appeal. The appeal process can take up to 30 business days.

Sending a request for appeal

An individual can appeal a decision on behalf of an eligible child as described in Step 2. Who is covered, including

- a parent or guardian of that child
- a First Nations child, or an Indigenous child ordinarily resident on reserve at the Age of Consent in their province or territory of residence
- an authorized representative of the child, parent or guardian

Requests for appeals for a group of children from multiple families or guardians can be submitted by:

- the community or group that submitted the request

Please contact us if you have:

- any questions
- new information about any request under Jordan's Principle that was submitted or denied between 2007 and 2017

For more information

- Jordan's Principle regional focal points across Canada
- local service coordinators in First Nations communities or organizations across Canada (contact your local Jordan's Principle regional focal point to get this information)
- Jordan's Principle Call Centre: 1-855-JP-CHILD (1-855-572-4453), open 24 hours a day, 7 days a week
- teletypewriter: 1-866-553-0554

Did you find what you were looking for?

What was wrong?

- I can't **find** the information
- The information is hard to **understand**
- There was an error or something **didn't work**
- Other reason

Please provide more details

You will not receive a reply. Don't include personal information (telephone, email, SIN, financial, medical, or work details).

Maximum 300 characters

Submit

Date modified: 2025-01-16



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[Canada.ca](#) › [Indigenous Services Canada](#) › [Indigenous health](#)

› [Health care services for First Nations and Inuit](#) › [Jordan's Principle](#)

Submit a request under Jordan's Principle

Important

If a child needs **immediate** care, please call 911 or your local emergency services number, or visit the nearest health facility.

Urgent requests

If you have an urgent request that meets the following interim criteria, please contact the Jordan's Principle Call Centre at [1-855-JP-CHILD](tel:1-855-JP-CHILD) ([1-855-572-4453](tel:1-855-572-4453)). This could include:

- life threatening cases
- cases involving end-of-life or palliative care
- risk of suicide
- risk to physical safety
- no access to food or basic necessities
- risk of entering the child welfare system
- caregivers and children fleeing from domestic violence

This interim criteria of urgent was clarified by the Canadian Human Rights Tribunal ruling 2025 CHRT 6.

Urgent requests for products, services or supports under Jordan's Principle must be directly linked to the child's urgent circumstances.

Requests are reviewed on a case-by-case basis. There may be some time-sensitive requests that are urgent, but are not covered by the above.

On this page

- [Updates on Jordan's Principle](#)
- [Information to include with your request](#)
- [What is covered](#)
- [Who is covered](#)
- [Who to contact](#)
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Updates on Jordan's Principle

Statement by Minister Hajdu on the changes to operating procedures related to processing requests under Jordan's Principle (February 10, 2025)

Jordan's Principle Operational Bulletin

Information to include with your request

A request must include:

1. Confirmation of eligibility.
2. Completed application form
 - a. Please clearly explain how the requested product, service, or support will meet the child's specific health, social, or educational needs.

- b. Provide a detailed cost breakdown of requested products, services and/or supports.

3. Documentation

- a. All requests must be accompanied by a letter of support that shows how the requested product, service or support links directly to the child's unmet health, social or educational needs.
 - b. Support letters must come from a health professional, educational professional, Elder, or Knowledge Keeper who knows the child and can identify their needs.
 - c. Professionals providing a letter of support must do so within their scope of practice.
 - d. If you are requesting additional funding to extend services for the child, updated letters of support are required to support the child's changing needs or to demonstrate a need for continued supports or services.
 - e. Include any relevant assessments or diagnoses.
 - f. Explains how the child experienced gaps or delays in accessing government services, or has denied an existing government service because of their identity as a First Nations child
4. Parent or guardian consent if you are submitting an application on behalf of the parent of guardian of the First Nations child.
 - a. Additional documentation may be required

Please see [Documents needed for a request](#) (info additional information).

If you have any questions on how to submit an application for Jordan's Principle or need support in completing an application, please [contact us](#).

Available 24 hours, 7 days a week

- Jordan's Principle Call Centre: 1-855-JP-CHILD (1-855-572-4453)
- teletypewriter: 1-866-553-0554

What is covered

Jordan's Principle supports substantively equal access to a wide range of health, social and educational products, supports and services that respond to the unique situation and distinct needs of each First Nations child.

Under Jordan's Principle, we can:

- inform families about the help available for their child and how to access it
- coordinate access to products, services and supports
- provide funding when it's needed to make sure products, services and supports are accessed without delay

What is funded

Funding can help with a wide range of health, social and educational needs, including the unique needs that First Nations Two-Spirit and LGBTQQIA children and youth and those with disabilities may have. Some examples of what can be funded under Jordan's Principle include:

Health

- Child-specific addiction services
- Professional mental health services
- Specialized hearing aids
- Assessments and screenings for a medical or educational need

- Transportation to child-specific medical appointments
- Medical supplies and equipment
- Therapeutic services for individuals or groups (speech therapy, physiotherapy, occupational therapy)
- Medical respite care (individual or group)
- Mobility aids
- Wheelchair ramps

Social

- Child-specific land-based activities on reserve
- Child-specific specialized programs based on cultural beliefs and practices on reserve

Education

- School supplies
- Tutoring services
- Teaching assistants on reserve
- Assessments and screenings for educational needs
- Assistive technologies and electronics related to child-specific educational needs
- Specialized school transportation

Each child's situation is unique. If you have questions about what may be covered, contact your [regional focal point for Jordan's Principle](#).

Capital assets

On January 18, 2022, the Canadian Human Rights Tribunal (CHRT) amended its November 2021 orders on funding capital assets to support the delivery of the First Nation child and family services (FNCFS) program and Jordan's Principle ([2021 CHRT 41](#)).

For more information on how to request funding for capital assets:

- [Funding for capital assets: Jordan's Principle and First Nations child and family services](#)

What is not eligible to be funded

ISC will not approve funding for the following items unless such funding is required by substantive equality under Jordan's Principle:

- purchase, construction or structural renovations of homes
- requests to support sporting events or elite or competitive sport-related training, unless it is linked to the specific health, social, or educational needs of the First Nations child
- international travel, unless it is related to an exceptional medical need of the First Nations child
- non-medical supports such as travel costs, non-medical respite care, child care, clothing, furniture and vehicles, unless accompanied by a letter of support from a medical professional. The professional must be able to provide a child-specific recommendation based on their professional designation and their knowledge of the First Nation child's specific needs

- school-related requests, unless linked to the specific health, social or educational need of the First Nations child. Supports to school boards off-reserve and private schools will be redirected to provincial school boards, or other existing provincial and federally-funded programs
- automatic administrative fees within group requests, including salaries, service fees and overhead costs

Who is covered

On November 25, 2020, the CHRT released a ruling about Jordan's Principle eligibility. A First Nations child under the age of majority in their province or territory of residence can access Jordan's Principle, if they permanently reside in Canada and if the child meets one of the following criteria:

- is registered or eligible to be registered under the *Indian Act*
- has one parent or guardian who is registered or eligible to be registered under the *Indian Act*
- is recognized by their nation for the purposes of Jordan's Principle
- is ordinarily a resident on reserve

The eligibility above replaces the CHRT interim motion ruling of February 2019.

To find out more about how to confirm with a First Nations official that a child is recognized by their nation (for the purposes of Jordan's Principle), contact your [regional focal point for Jordan's Principle](#) or the [Jordan's Principle Call Centre](#).

If you are a First Nations leader or official, looking for more information about what this means to your nation, please contact your regional office or [regional focal point for Jordan's Principle](#).

Ordinarily resident on reserve means that an **Indigenous child**:

- lives on reserve
- normally lives on reserve even if the child or one of the members of their household (such as a sibling, parent, extended family living with child) may have been required to spend some time away temporarily from the community to access services such as health care or education where there are no other comparable services available in the community
- was ordinarily resident on reserve immediately prior to accessing Jordan's Principle
- is a dependent of a family that maintains a primary residence on reserve
- returns to live on reserve with parents, guardians or caregivers during the year, even if they live elsewhere while attending school or to receive medical care or other services
- meets student eligibility requirements in Yukon Territory

A child taken into care of a Child and family services agency or into a kinship or informal agreement is considered ordinarily resident on reserve where:

- the child's parent or guardian lived on reserve at the time the child was taken into care
or
- a child goes into the care of a guardian who lives on reserve

Requests for Inuit children can be made through the [Inuit Child First Initiative](#).

Please [contact us](#) if you're not sure how to help an Indigenous child who needs access to products, supports and services.

Who to contact

Contact us to:

- get more information about Jordan's Principle
- request funding for a product, service or support
- get copies of forms
- seek reimbursements
- start an appeal

You can reach us through:

- Jordan's Principle focal points across Canada
- local service coordinators for First Nations communities

Regional focal points across Canada

If you can't reach a regional focal point or you are seeking assistance after the listed business hours, please contact the [Jordan's Principle Call Centre](#).

Expand all

Collapse all

▼ National Office

Monday to Friday 8:00am to 4:00pm Eastern time

Indigenous Services Canada

JPCaseMgt-GestCasPJ@sac-isc.gc.ca

▼ Atlantic Region (New Brunswick, Newfoundland , Nova Scotia, Prince Edward Island)

Monday to Friday 8:30am to 4:30pm Atlantic time

For requests:

[1-833-652-0210](tel:1-833-652-0210)

principedejordanatl-jordansprincipleatl@sac-isc.gc.ca

For payment inquiries:

jordansprincipleatl_finance-principedejordan@sac-isc.gc.ca

▼ Quebec

Monday to Friday 8:00am to 4:00pm Eastern time

For requests:

[1-833-725-7236](tel:1-833-725-7236)

principedejordan-qc-jordanprinciple@sac-isc.gc.ca

For payment inquiries:

principedejordanfacturation-qc-jordanprincipleinvoicing@sac-isc.gc.ca

▼ Ontario

Monday to Friday 8:00am to 4:00pm Eastern time

For requests:

1-833-442-2429

jordansprincipleon-principedejordan@sac-isc.gc.ca

For payment inquiries:

1-833-442-2429

principedejordanfinance-on-financejordansprinciple@sac-isc.gc.ca

▼ Manitoba

Monday to Friday 8:00am to 4:00pm Central time

For requests:

1-833-725-8807

jordansprinciplemb-principedejordan@sac-isc.gc.ca

For payment inquiries:

fnihbfnihmbrjp-spnirmbdgspni@sac-isc.gc.ca

▼ Saskatchewan

Monday to Friday 8:00am - 4:00pm Central time

For requests:

1-833-752-4453

principedejordansk_admission-jordansprinciplesk_intake@sac-isc.gc.ca

For payment inquiries:

1-833-752-4453

jordansprinciplesask_finance-principedejordan@sac-isc.gc.ca

▼ Alberta**Monday to Friday 8:00am to 4:00pm Mountain time****For requests and payments:**1-833-632-4453jordansprincipleab-principedejordan@sac-isc.gc.ca**▼ British Columbia****Monday to Friday 8:00am to 4:00pm Pacific time****For requests:**778-951-0716principedejordancb-bcjordansprinciple@sac-isc.gc.ca**For payment inquiries:**778-951-0716paiementsprincipedejordancb-bcjordansprinciplepayments@sac-isc.gc.ca**▼ Northern Region - Yukon, Northwest Territories and Nunavut****Monday to Friday 8:00am to 4:00pm Eastern time****For requests:**1-866-848-5846principedejordanrn-nrjordansprinciple@sac-isc.gc.ca**For payment inquiries:**1-866-848-5846principedejordanfinancern-nrfinancejordansprinciple@sac-isc.gc.ca

There are local service coordinators that have been hired in communities across Canada. They can help families who:

- have questions about Jordan's Principle
- would like to submit a request for products, services or supports under Jordan's Principle

We fund these coordinators, who are staffed by:

- local tribal councils
- First Nations communities
- regional health authorities
- First Nations non-governmental organizations, etc.

To reach a local service coordinator, please contact your community or tribal council for available support.

Who can send requests

A request for a child or children in the same family or with the same guardian can be submitted by:

- a parent or guardian of a First Nations or Indigenous child who ordinarily resides on reserve
- a First Nations, or Indigenous child who ordinarily resides on reserve, at the age of consent in their province or territory of residence. A child at the age of consent can make decisions on their own about the care they need. Age of consent varies by province or territory.
- an authorized representative of the child, parent or guardian
 - written or verbal consent must be provided by the parent or guardian

An authorized representative is an individual or business that the requester has given authorized, written permission to act on their behalf with respect to a Jordan's Principle request.

A request for a group of children from multiple families or guardians can be submitted by:

- a parent or guardian of First Nations or Indigenous children who ordinarily reside on reserve
- a community or Tribal Council
- a community organization or institution
- a service coordinator, navigator or case manager

How to send a request



Contact us through our [call centre](#), open 24 hours a day, 7 days a week, or your [regional focal point](#) to start your request to access services through Jordan's Principle.

The call centre or your regional focal point can provide copies of the forms to start a request or assist you with filling them in.

You can also obtain copies of the forms by clicking and downloading:

- [Individual or family request form](#)





How to open the PDF forms

These forms won't open on a mobile device, you will need a computer.

Don't double-click the PDFs. Right click instead.

To access these PDF forms:

1. Install [Adobe Reader 10+](#)  or an alternate reader if you don't already have one
2. [Download and save the PDF file to your computer](#) 
3. Right click on the PDF file you have saved on your computer, select "Open with", choose your PDF reader

We want to make the application process as easy to understand as possible.

Having certain information ready when you contact us can help if you are seeking access to products, services or supports. We start by working with you to gather the basic information to make the request.

To help us confirm the child's [eligibility](#), we may need one of these:

- name, date of birth or registration number of a First Nations child or parent who is registered under the *Indian Act*
- name and date of birth of a First Nations child or parent who is not registered but is entitled to Indian status under the *Indian Act*
- documents confirming a child ordinarily lives on a reserve
- confirmation that your child is recognized by their First Nation for the purposes of Jordan's Principle – visit Confirmation of recognition for more information
 - as a parent or guardian, you could provide a copy of the Confirmation of recognition form completed by a First Nation's designated or deemed official
 - you can also choose to provide consent to Indigenous Services Canada to seek confirmation of recognition from your First Nation on your behalf by completing the Consent to communicate form
 - if you are a service coordinator, a First Nations leader or official looking for more information about what this means to your First Nation, visit Confirmation of recognition

Contact us to obtain copies of these forms.

You will need to send in a letter of support that shows how the requested product, service or support links directly to the child's unmet health, social or educational needs. Letters of support must be provided by a health professional, educational professional or Elder or Knowledge Keeper, depending on their expertise as it relates to their ability to determine the unmet needs of the child, and the supports required.

Additional documentation may be required to show how the requested product, service or support meets the child's identified health, social or educational need. If you are unsure of what you should submit, visit

document needed for a request or contact your regional focal point.

If you are seeking reimbursement, follow the steps listed in Step 7. Reimbursements.

Processing requests

The Jordan's Principle regional focal point in your area will review the completed request. A decision will be sent to you in writing after the request is processed.

How long it takes to process a request

Jordan's Principle has experienced a significant growth in requests and due to the significant increase in demand, we are experiencing delays in processing Jordan's Principle requests. Every request is unique and may vary in complexity and this impacts both in the amount of time and effort required to review the request.

Requests for a child or children in the same family or with the same guardian:

- **urgent requests** (the child's current health or safety is a concern) are processed within 12 hours
- all other requests are processed within 48 hours of receiving all necessary information
 - if we do not have enough information to confirm the type of product, service or support the child needs, more time may be necessary to get this information; however, if the child requires an assessment of their need(s), this can be paid for immediately under Jordan's Principle

Requests for a group of children from multiple families or guardians:

- **urgent requests** are processed within 48 hours of receiving all necessary information
- all other requests are processed within 1 week of receiving all necessary information

Approved requests are managed in 1 of 2 ways:

1. where possible, we arrange for the products, services or supports to be provided directly to the child, or children. In these situations, there is no cost to the family, guardian, child or authorized representative and reimbursement is arranged directly with the service provider or vendor
2. if the family, guardian, child or authorized representative has already paid for the approved product, service or support, then reimbursement of these expenses will be provided

Denied request

If your request is denied, you may appeal the decision up to 1 year from the date the request was denied.

Reimbursements

Reimbursement will be provided if the approved product, service or support has already been paid.

Please note that previously-approved requests might not be approved again. We recommend that you do not pay for services until ISC has approved your request.

A reimbursement form is needed:

- to request reimbursement for costs paid for approved requests
- for service providers and vendors to request direct payment for services rendered

Follow these 3 steps to request a reimbursement:

1. contact us so we can help you start the process and confirm that the product, service or support will be funded
2. complete a reimbursement form. We can send you the form and help you fill it in
3. send the completed reimbursement form to the Jordan's Principle regional focal point in your area and include all relevant supporting documents

Receiving the payments

Requests for a child or children in the same family or with the same guardian:

- the parent or guardian normally gets the payment if the child is under the age of majority in their province or territory of residence
- children over age 16 may get the payment if they submitted the request
- a vendor or service provider may be paid directly

Request for a group of children from multiple families or guardians:

- payment will be made to the community or group that made the request
- vendors or service providers may be paid directly

How to appeal decisions

If your request is denied, you can appeal the decision within **1 year** of the date of denial. To do so, you must send in a written request to your regional focal point. They will help you start the appeal and work with you throughout the process.

At a minimum, the request for appeal must contain:

- the child's name and date of birth
- the product or service requested
- the date of denial and a copy of the Jordan's Principle denial letter (if available)

Although it is not required to begin an appeal, you may also include additional information, such as:

- assessments or updated letters of support from a health professional, educational professional or Elder or Knowledge Keeper
- information showing that the request will help:
 - substantive equality
 - access to a culturally appropriate service
 - meet the best interests of the child

New or additional information is not needed to start an appeal. Jordan's Principle aims to review the request within 30 business days.

An individual can appeal a decision on behalf of an eligible child as described in Step 2. Who is covered, including

- a parent or guardian of that child
- a First Nations child, or an Indigenous child ordinarily resident on reserve at the Age of Consent in their province or territory of residence
- an authorized representative of the child, parent or guardian

Requests for appeals for a group of children from multiple families or guardians can be submitted by:

- the community or group that submitted the request

Requests for appeals are reviewed by the Jordan's Principle External Expert Review Committee (EERC) non-government experts, which provides a recommendation to the department regarding whether the denial decision should be upheld or overturned.

An appeal decision is then rendered based on the information presented in the file, including the EERC's recommendation. The regional focal points will help start the appeal and work with you throughout the process.

Please contact us if you have:

- any questions
- new information about any request under Jordan's Principle that was submitted or denied between 2007 and 2017

Requesting a judicial review

You can challenge the appeal decision by bringing an application for judicial review before the Federal Court within 30 days of receipt of the decision.

For more information on how to apply for a judicial review, see [How to file an Application for Judicial Review](#).

For more information

- [Jordan's Principle regional focal points across Canada](#)

- local service coordinators in First Nations communities or organizations across Canada (contact your local Jordan's Principle regional focal point to get this information)
- Jordan's Principle Call Centre: 1-855-JP-CHILD (1-855-572-4453), open 24 hours a day, 7 days a week
- teletypewriter: 1-866-553-0554

Did you find what you were looking for?

Yes

No

What was wrong?

- I can't **find** the information
- The information is hard to **understand**
- There was an error or something **didn't work**
- Other reason

Please provide more details

You will not receive a reply. Don't include personal information (telephone, email, SIN, financial, medical, or work details).

Maximum 300 characters

Submit

Date modified: 2025-02-10