

CANADIAN HUMAN RIGHTS TRIBUNAL

BETWEEN:

**FIRST NATIONS CHILD AND FAMILY CARING SOCIETY OF CANADA
and ASSEMBLY OF FIRST NATIONS**

Complainants

and

CANADIAN HUMAN RIGHTS COMMISSION

Commission

and

ATTORNEY GENERAL OF CANADA
(representing the Minister of Indigenous Services Canada)

Respondent

and

**CHIEFS OF ONTARIO, NISHNAWBE ASKI NATION, and AMNESTY
INTERNATIONAL CANADA**

Interested Parties

WILL-SAY STATEMENT: ANDREA REYNOLDSON

About Andrea Reynoldson

Andrea Reynoldson is the current Acting Director General, Service Delivery & Operations, Jordan's Principle, within the Child, Families and Learning sector of Indigenous Services Canada (ISC). She was previously responsible for regional delivery of Jordan's Principle in Saskatchewan as Regional Director, Strategic Policy, Planning & Transformation from July 2021 to October 2023 and Acting Regional Executive from November 2023 to January 2026.

Roles and Responsibilities

As Acting Director General of Service Delivery & Operations in Jordan's Principle, Andrea is responsible for oversight of national operational service delivery and coordination with regions on the implementation of Jordan's Principle.

Post-2025 CHRT 6 Implementation Context

Andrea will speak to ISC's operational response to the Tribunal's Jordan's Principle orders, including, but not limited to, those arising from 2025 CHRT 6 explaining what was changed, what was implemented, and the results demonstrated. This evidence will address key measures

undertaken to implement the orders, their operational impacts, and lessons learned through implementation. It will also address assessment and funding of requests under Jordan's Principle, including the operational case by case application of substantive equality in decision-making.

Andrea will speak to ISC's operational bulletin, released on February 10, 2025 (the "Operational Bulletin"), including, but not limited to, explaining how the Operational Bulletin ensures more consistent and clear policies and communications about the services First Nations children can access through Jordan's Principle and the required documentation to access those services and supports, describing areas where it aligns with past operational practices, including the need for letters of support, and how it also sets out the need for all requests to pertain to specific First Nations children and their individual needs. Andrea will also speak to the lessons learned from the implementation of the Operational Bulletin, including but not limited to, how the Operational Bulletin informed the development of a National Service Improvement Plan intended to address operational challenges, strengthen service delivery, provide clarity, increase consistency and improve efficiency of Jordan's Principle operations for First Nations children.

Andrea will speak to the activities undertaken to support the continuous improvement of Jordan's Principle operations, including, but not limited to, the findings and recommendations arising from the Institute of Fiscal Studies and Democracy report, *Considerations for the Sustainability of Jordan's Principle*, and ISC's *May 2025 Audit of Jordan's Principle*.

Andrea will speak to ongoing engagement and collaboration with First Nations partners to advance service delivery improvements, identify and resolve emerging challenges, and obtain feedback on operational improvements and implementation priorities. This includes, but is not limited to, work underway to establish regional partnership tables with First Nations Rights Holders.

Description of ISC's Jordan's Principle Operations

Andrea will speak to the structure and implementation of Jordan's Principle operations within ISC, including, but not limited to, the role of operational guidance, procedures, and decision-making tools and training in supporting consistent, transparent, predictable, and stable service delivery for First Nations children and families, while maintaining flexibility needed for continuous improvement.

Andrea will describe ISC's decentralized delivery model including, but not limited to, the distinct regional and national operational functions and supports for the processing of a broad range of individual and group requests under Jordan's Principle. She will address how operational changes are developed and implemented, as well as the complexities associated with delivering Jordan's Principle across a landscape of varying service coordination models, provincial and territorial systems, and partner administration approaches.

Andrea will also describe ISC's Jordan's Principle Case Management System, as well as relevant data and analysis. To illustrate Jordan's Principle operations and respond to other Parties' evidence, Andrea will provide specific examples of how ISC has handled individual and group requests.

Response to Orders sought by the Parties

Andrea will speak to the potential operational implications of the orders sought by the Parties, particularly those arising from or related to 2025 CHRT 6 including, but not limited to, how their proposed orders could affect the administration of Jordan's Principle and the timely delivery of products, services, and supports to First Nations children. She will also address potential impacts of their proposed orders on operational complexity, resource allocation, implementation, responsiveness to requests, and the risk of unintentionally redirecting children to Jordan's Principle from programs and services better suited to meet their needs.

Andrea will speak to the operational implications of the Parties' proposals related to 2025 CHRT 6 including, but not limited to, the following:

- the manner in which urgent requests are identified and prioritized;
- the proposed definition of "basic necessities," including how requests for basic necessities are currently addressed and the operational impacts that could result from adopting an overly broad definition;
- how ISC assesses urgent requests where a risk of child removal is raised;
- the proposed definition of "fleeing domestic violence";
- how supports are provided for children and families affected by emergencies, including for evacuees, and the distinction between Jordan's Principle urgent requests and services provided by emergency services providers (e.g. 911) or emergency management coordination bodies during an active emergency;
- the role of qualified professionals, including operational considerations in remote and rural communities and in urgent circumstances;
- ISC's approach to the determination clock, including minimum information and documentation required to assess requests appropriately; and
- the various channels through which complaints are received and the processes for responding to them.

Andrea will also cover some of the broader issues raised by the Parties' Joint Motion including, but not limited to, the following:

- the importance of ensuring that resources remain focused on delivering supports and services to First Nations children;
- ISC's current appeals process and the need to update the approach;
- ISC's approach to funding under Jordan's Principle;
- the impact of additional consultation requirements, including the potential effects on ISC's ability to engage broadly with First Nations Rights Holders and implement service improvements efficiently; and
- mechanisms for engagement and collaboration with First Nations partners, including but not limited to, JPOC and JPAT.

In addition, Andrea will explain how lessons learned post-2025 CHRT 6 implementation inform ISC's views on the operational feasibility and potential implications of further orders.