

## Position Paper

**Subject:** Response to Proposed Revisions to the Home Modifications Policy (Policy 21-403)

**Prepared by:** WorkSafeNB's Injured Worker Advisory Committee (IWAC)

**Date:** January 2025

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## Introduction

The Injured Worker Advisory Committee (IWAC) welcomes the opportunity to provide input on the proposed revisions to the Home Modifications Policy. As advocates for injured workers and their families, we recognize the critical importance of ensuring that home modifications enable workers to regain functional access and mobility while promoting dignity, independence, and long-term well-being.

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## General Comments on the Revisions

We commend the inclusion of clearer eligibility criteria and expanded guidance on discretionary benefits. The emphasis on transparency and practicality in assessing needs, budgeting, and implementation aligns with IWAC's commitment to advocating for equitable and effective support systems for injured workers.

However, IWAC wishes to highlight additional considerations to further enhance the policy:

### 1. A Broader Definition of Functional Impairments

While the policy appropriately emphasizes severe long-term functional impairments (e.g., spinal cord and brain injuries), we urge the inclusion of other conditions, such as mobility challenges arising from secondary issues like significant weight gain.

Injuries that limit physical activity can lead to health complications, such as obesity, which may exacerbate access and mobility issues.

- **Recommendation:** Consider integrating secondary health impacts (e.g., weight-related mobility issues) as part of the eligibility and needs assessment to ensure comprehensive support.

### 2. Focus on Prevention

IWAC encourages WorkSafeNB to adopt a proactive approach to injury-related health challenges, emphasizing the "ounce of prevention, pound of cure" principle. For example, weight management tools (including weight-loss aids) may help

mitigate mobility issues, reducing the need for more extensive and costly home modifications in the future.

- **Recommendation:** Expand the policy to include preventative measures for maintaining mobility and access, potentially as a complementary benefit under assistive devices or medical aids.

### 3. **Transparency and Accessibility of Benefits**

The revisions include clearer guidance for discretionary benefits, such as temporary living arrangements and modifications for alternative housing. While these changes are welcome, IWAC recommends ensuring that workers have easy access to detailed explanations of these benefits, including timelines and decision-making processes.

- **Recommendation:** Provide clear communication materials outlining the scope of benefits to enhance transparency and reduce potential stress for workers navigating this process.

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## **Specific Feedback on Proposed Changes**

### 1. **Revised Definitions and Scope**

- IWAC supports the removal of outdated definitions like “severe and prolonged” in favor of “significant long-term functional impairment.” This change better reflects modern practices and terminology.
- The decision to make home modifications a discretionary benefit is appropriate, provided workers receive equitable treatment and clear criteria are consistently applied.

### 2. **Budget and Cost Management**

- Removing the cap tied to the cost of a barrier-free modular home allows for more flexibility and practicality in addressing unique worker needs.
- IWAC appreciates the inclusion of incidental costs (e.g., temporary living arrangements) in the project budget and supports the \$2,000 limit as a reasonable allowance.

### 3. **Alternative Living Arrangements**

- IWAC agrees with the inclusion of alternative living arrangements when modifications are not feasible but urges WorkSafeNB to ensure these decisions prioritize the worker's dignity and convenience.

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## Conclusion

IWAC strongly supports the overarching goals of the Home Modifications Policy to improve functional access and mobility for injured workers. We believe that incorporating broader definitions of impairment, emphasizing preventative approaches, and ensuring transparent communication will further strengthen the policy's impact.

We appreciate the opportunity to contribute to this consultation and remain committed to working with WorkSafeNB to enhance the lives of injured workers in New Brunswick.

### Signed on behalf of the Injured Worker Advisory Committee:



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