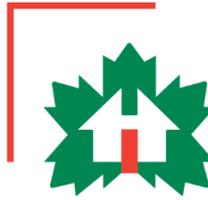


Suite 500
150 Laurier Avenue W.
Ottawa, Ontario K1P 5J4

T. 613-230-3060
E. chba@chba.ca
W. www.chba.ca

**Canadian
Home Builders'
Association**



**Association canadienne
des constructeurs
d'habitations**

CHBA Submission – Employment Insurance Service Quality Review August 18, 2016

Thank you for inviting the Canadian Home Builders' Association (CHBA) to take part in the Employment Insurance (EI) Service Quality Review (SQR).

The residential construction industry supports over 1 million jobs in new home construction, renovation and repair, and continues to be one of the largest employers in Canada. One of every 18 workers in Canada is employed, directly or indirectly, in residential construction.

We appreciated the opportunity to take part in the national stakeholder meeting held on June 2, 2016 in Ottawa to discuss EI service quality and other related issues. Representatives from the Nova Scotia Home Builders' Association and CHBA Prince Edward Island also provided feedback through roundtable meetings held in Halifax and Charlottetown in mid-July.

We are pleased to see that consideration is being given to the trade-offs between improving services and managing premium rates in the discussion paper for the EI SQR. This commitment relates directly to the Association's long-term policy positions regarding Employment Insurance as outlined below:

- The residential construction industry believes that EI premiums should be reduced or maintained at levels appropriate to sustain the program and the funds in the EI Account should be dedicated to the purposes intended.
- The industry believes the design of the EI program should be dictated by policy and must be the outcome of evidence-based analysis.
- The industry also believes it is important to consider any unintended consequences to employers (such as costly increased administrative loads) when making changes to the EI Program.

We are also pleased to see that reducing the administrative burden on employers is one of the three main areas being addressed. From reviewing the on-line survey for the consultation, it appears the key questions being asked of employers is whether they have contacted an Employer Contact Centre, and if so, what additional services they would like to see offered through the Contact Centre. Ideally, employers would be able to call the Employer Contact Centre with any and all questions related to their role in the Employment Insurance (EI) Program. However, if this is not possible, we recommend posting a decision tree along with a search function on appropriate websites to help employers quickly determine who they should contact on a particular issue. This would include websites hosted by Employment and Social Development Canada/Service Canada and the Canada Revenue Agency.

Furthermore, the greatest administrative burden on employers related to EI is having to issue Records of Employment (ROEs) within five business days of cessation of employment. CHBA recommends employers be given the option to meet the government's information needs without having to issue ROEs (i.e. sharing e-payroll data or some other means which complies with federal and provincial privacy legislation).

As mentioned on June 2nd, CHBA also recommends the two-week waiting period for apprentices be eliminated with perhaps a separate stream for apprentices accessing EI during in-school training. The rationale for a waiting period in this case does not apply. Elimination of this barrier would help improve apprenticeship completion rates for all eligible apprentices.

Suite 500
150 Laurier Avenue W.
Ottawa, Ontario K1P 5J4

T. 613-230-3060
E. chba@chba.ca
W. www.chba.ca

**Canadian
Home Builders'
Association**



**Association canadienne
des constructeurs
d'habitations**

In conclusion, we commend the government for undertaking the Employment Insurance Service Quality Review and for referencing employers' service issues in its mandate. This is a great opportunity to make changes for all concerned. We look forward to having the results of the review and knowledge of the items that will ensue.

Since 1943, the Canadian Home Builders' Association (CHBA) has been "the voice of Canada's residential construction industry." Representing one of the largest industry sectors in Canada, our membership is made up of over 8,500 companies – including home builders, renovators, land developers, trade contractors, product and material manufacturers, building product suppliers, lending institutions, insurance providers, and service professionals.