

**CANADIAN HUMAN RIGHTS TRIBUNAL**

**B E T W E E N:**

**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)**

-and-

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

Interested Parties

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**WILL SAY STATEMENT OF KATLYN O'SHEA**

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1. Katlyn O'Shea is a Registered Nurse and the Jordan's Principle Manager for North Shore Mi'kmaq Tribal Council ("NSMTC") in Eel Ground New Brunswick. Ms. O'Shea has been in this position since 2018. In this capacity, Ms. O'Shea oversees the Jordan's Principle service coordination and interdisciplinary clinical team, liaises with Chiefs and First Nation leadership, takes measures to secure substantively equal and culturally appropriate service access for children, navigates provincial and federal services, and manages a multi-million-dollar budget.

2. Ms. O'Shea is currently obtaining her Doctorate in Public Health at the University of Toronto. She has a Master of Public Health from the University of Victoria, a Bachelor of Nursing

and a Bachelor of Philosophy in Interdisciplinary Leadership from the University of New Brunswick. Ms. O'Shea completed practicums in First Nations addictions treatment, and in community health and mental wellness (at the Eel Ground First Nation Health and Wellness Centre). Prior to her roles at NSMTC, she was a Registered Nurse in Inpatient Psychiatry at the Moncton Hospital for youth in the provincial child and adolescent and regional youth units; and was a Community Health Nurse for Carrier Sekani Family Services in Vanderhoof, British Columbia where she delivered primary care and health services in Nadleh Whut'en and Stellat'en First Nations within Carrier and Sekani territory.

3. Prior to her employment as the Manager, Katie O'Shea was the Jordan's Principle Service Coordinator for NSMTC from 2017-2018. In this capacity, Ms. O'Shea conducted an assessment of children, youth and their families' needs as a Registered Nurse, while coordinating health, social and educational services, facilitated community outreach and engagement activities, contributed to the design of a program-specific electronic medical system.

4. NSMTC provides service delivery, technical support, and capacity-building in water and waste management, housing and infrastructure, post-secondary education funding, training and employment, community development, clean energy opportunities, environmental stewardship, and health service coordination. NSMTC primarily services seven Member Nation communities - Ugpi'ganjig (Eel River Bar) First Nation, Oinpegitjoig (Pabineau) First Nation, Natoaganeg (Eel Ground) First Nation, Metepenagiag (Red Bank) Mi'kmaq Nation, L'nui Menikuk (Indian Island) First Nation, Tjipōgtōtjg (Buctouche) First Nation, and Amlamgog (Fort Folly) First Nation. However, they support 25 other First Nation communities across Atlantic Canada. NSMTC provides Jordan's Principle service coordination and supports to help First Nations children on and off reserve access needed health, social, and educational services.

5. Ms. O'Shea's evidence will provide an overview of the experiences of NSMTC with Jordan's Principle and demonstrate how NSMTC coordinated Jordan's Principle Requests and serviced its children, youth and families through the Jordan's Principle request process.

6. Ms. O'Shea's evidence will describe changes that NSMTC observed leading up to ISC's release of the February 10, 2025 Jordan's Principle Operational Bulletin: Updates to the Implementation of Jordan's Principle (the "**Operational Bulletin**") as it pertains to Jordan's Principle including requests and funding, and the impacts of the Operational Bulletin on service coordination and service delivery in the New Brunswick Region. Ms. O'Shea's evidence will further highlight the negative impacts on NSMTC staffing and service coordination as a result of the Operational Bulletin and related implications for children; the negative impacts on the collaterals, including professionals, that NSMTC works with regularly so that children and families get the services and supports they need; and how the Operational Bulletin impacted getting services, supports and products to the children, youth and families that NSMTC serves.