

March 22, 2024

Ministry for Seniors and Accessibility  
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Care Watch is a not-for-profit volunteer run advocacy organization led by older adults. We advocate for accessible equitable home and community care as well as for other key supports that are needed to enable older adults to age in place and to live independently and safely in their own homes for as long as possible.

Seniors Active Living Centres (SALCs) provide social, cultural, educational, and recreational services that play a crucial role in helping older adults to age in place and remain in their own homes. The need for SALC services is increasing rapidly as a result of the aging of Ontario's population. Moreover, serious gaps in the availability of SALC services already exist, especially with respect to Indigenous communities and to rural and remote parts of the province. We believe that the Ontario government will need to take major steps in the coming years to significantly expand access to SALC services in order to achieve the government's declared goal of ensuring that older adults are able to access the right services and supports in the right places.

We have identified two areas of concern with respect to the proposed regulation.

**Municipal Participation and Contribution:**

The first area of concern relates to the role of municipalities as contributors to and partners with SALCs. Municipalities are critical service partners and, as well, play a critical role in the establishment of new SALCs. This past year, sixteen new SALCs were added in Ontario with the help of municipal funding.

Care Watch is concerned that the draft regulations pose a significant risk to municipal partnership and contribution by creating more opportunities to transfer their financial contribution to prescribed entities, such as local non-profit organizations. This appears to de-emphasize the role of municipalities in maintaining sustainable programming much less expanding the capacity of existing SALCs and the establishment of new SALCs.

Such consequences, while unintended, could potentially be disastrous. It would lead to the widespread destabilization of established funding relationships between SALCs and municipalities that are critical to the effective delivery of SALC services.

**RECOMMENDATIONS:**

1. That the Province continue to require municipal contributions to the net operating cost of established or new SALCs within municipal boundaries. Prescribed Entities may be encouraged to participate to expand the capacity of programming, not replace municipal contributions.
2. That, in unorganized areas that lack a municipal government entity, Local Service Boards and other Prescribed Entities be eligible to contribute, in cash or in-kind, to the 20% of net operating costs otherwise contributed by municipal governments.

We also urge the government to consult with key stakeholders to design the best vehicle for improving the funding and operation of SALCs, especially the Older Adults Centres Association of Ontario (OACAO) and the Association of Municipalities of Ontario (AMO).

If the urgent need to increase the availability of SALC services in Ontario is going to be met, municipalities must not only maintain but, to the greatest extent possible, expand their role in funding new SALCs.

**Definition of Prescribed Entities:**

The second area of concern relates to the definition of prescribed entities currently identified in the draft regulation. While we generally support the range of entities identified, we note some significant gaps.

*Local Service Boards*

Care Watch supports the inclusion of Local Services Boards which operate in unorganized areas where no municipalities exist as Prescribed Entities. However, we note that LSBs have more limited mandates, powers and resources than municipalities, and face greater challenges in being able to contribute to SALC programming within their geographic boundaries. We also note that, at present, there are no established SALC services in such areas.

**RECOMMENDATION:**

3. Create a mandate for LSBs by amending the *Northern Services Boards Act, R.S.O. 1990* to allow for the expansion of activities beyond the provision of library and recreation services. Create an incentive for LSB contribution by providing access to community and other grants to be used for the purposes of establishing or contributing to SALC programming

*Indigenous organizations*

Care Watch strongly supports the designation of Indigenous communities and organizations as Prescribed Entities. The systemic service barriers and historic injustices that have impeded Indigenous people in accessing SALC services as well as a large number of other services and benefits are well known.

We note, however, that *Indigenous Friendship Centres* are not included on the list of Indigenous prescribed entities. Indigenous Friendship Centres provide a significant range of culturally-appropriate services to all Indigenous people living outside of a First Nation, including programming that is akin to that of the SALCs. Inclusion of Indigenous Friendship Centres is critical to ensuring and improving access to needed services for Indigenous people across Ontario.

**RECOMMENDATION:**

4. That Indigenous Friendship Centres be included as a Prescribed Entity.

Finally, Care Watch believes that the Province needs to increase financial assistance to SALCs, not just to keep up with inflation, but also to increase service capacity and responsiveness to the needs of the growing population of older adults. Care Watch advocates a minimum of 6 per cent increase to 2024-2025 funding to cover recent inflationary pressures.

We further believe that priority in both seed funding and on-going operating grants for Indigenous communities and organizations, and Local Service Boards, are required to enable them to participate on a more equitable basis as sponsors of SALCs and to provide them with enhanced resources in areas such as training and digital capacity.

Respectfully submitted,

**Care Watch Board of Directors**

*Original signed*

John Bagnall, Vice Chair

*Original signed*

Fiona Green, Chair