



PARKS AND RECREATION ONTARIO

## Proposal Response:

A regulation to prescribe entities under the Seniors Active Living  
Centres Act, 2017 (SALCA)  
Proposal Number: 24-MSAA001

Parks and Recreation Ontario Submission  
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PARKS AND RECREATION ONTARIO

## About Parks and Recreation Ontario

Parks and Recreation Ontario (PRO) is a non-profit association with over 6,500 members that delivers services to more than 85% of Ontario's population. We are devoted to advancing equitable access to quality parks and recreation services for all Ontarians. PRO champions the health, social, and environmental benefits of parks and recreation through evidence-based practices, advocacy, and collaborative cross-sectoral partnerships. Our work includes policy and research, education, training and professional development opportunities, and our flagship quality standards program, HIGH FIVE® which includes a stream called the *Principles of Healthy Aging*. We envision a future for Ontario where every person has equitable access to vibrant communities, sustainable environments, and personal

## Introduction

We are writing to express our support for increased access to quality recreation services for older adults in Ontario. It is our belief that access to quality recreation is not a luxury; it is essential to healthy aging. For older adults, recreation provides crucial opportunities for socialization and physical activity – interventions that safeguard against health care costs associated with physical inactivity and isolation.

The Senior Active Living Centres Act, 2017 (SALCA) is a crucial funding source that has enabled municipalities across Ontario to provide essential recreation services and programs to older adults. **Over 70% of communities that currently offer SALC programming are served by PRO members.** We are grateful for continued investment through SALC funding, that supports thousands of older adults in accessing enriching, safe, and meaningful recreation opportunities.

We would like to express our gratitude to the Ministry of Seniors and Accessibility (MSAA) for proposing a new Lieutenant Governor in Council (LGIC) regulation under the SALCA, which if adopted, will enable more older adults to access recreation services. Most commonly, recreation has been a municipal jurisdiction; however, we recognize that crucial recreation services are also delivered through non-profit corporations, registered charities, Indigenous communities and organizations, and Local Services Boards (LSBs). We believe expanding the scope of prescribed entities will increase recreation opportunities for older adults in Ontario where programming is currently limited. Changes to the regulation will be especially beneficial to rural and northern communities, where recreation departments may not exist or lack the capacity to deliver specialized recreation programming. Broadening the eligibility of prescribed entities will empower other organizations and institutions to fill service gaps, leading to better health and well-being outcomes for all older adults in Ontario. Additionally, organizations will be able to provide specialized services and programming to older adults from underserved populations and communities.

## Acknowledgement & Future Funding Commitment

PRO acknowledges with gratitude, the Province for recent investments that are positively supporting our sector and are making a marked impact on the lives of older adults across Ontario. This includes an **increase from \$42,700 to \$50,000** of the maximum maintenance and operating funding threshold under the SALCA for 2024/25. We were pleased to learn that the Ministry did not remove increased funds allocated during the COVID-19 pandemic to support the SALC program. We sincerely commend the

Ministry for their decision to increase funding thresholds, thereby enabling prescribed entities to reach more older adults.

In recent years, the impacts of inflation, rising insurance rates, increases to wages, facility rental fees, and the rapidly growing older adult population, have resulted in prescribed entities experiencing significant demands and budgetary concerns. Funding increases promote healthy aging among older adults in Ontario, thus safeguarding against preventable disease and health conditions that would place further stress on Ontario's public health infrastructure. **PRO strongly recommends that funding increases are implemented on a yearly basis.** A year-over-year increased funding commitment will ensure that prescribed entities are able to continue providing quality programming as the older adult population continues to grow.

## PRO's Recommendations

PRO is pleased to see that under the new regulation more organizations would be eligible to be contributors to the health and well-being of older adults in Ontario. While we agree with the inclusion of prescribed entities identified by the Ministry, we request that definitions of entities are more comprehensive and provide absolute clarity. Particularly, we want to ensure that libraries, museums, and First Nations organizations, are included under this new regulation.

### Libraries and Museums

#### Recommendation

While non-profit corporations are already included as eligible prescribed entities under the proposed regulation, PRO recommends that **libraries and museums operated as non-profit corporations are specifically identified**, acknowledging the vital services they provide to older adults across Ontario.

Libraries and museums are important community hubs that provide essential services to older adults. Programs and services at libraries and museums targeted to older adults often include computer literacy courses, social events, special interest workshops, exercise classes and more. Libraries and museums are often centrally located and have space availability during weekdays, making them ideal venues to host programming for older adults.

While some libraries and museums are under the jurisdiction of municipalities, and are already eligible for funding under the SALCA, others are run independently as non-profit corporations. Rural and northern communities, especially those without municipalities, are more likely to operate libraries and museums as non-profit corporations. In urban centres, libraries and museums are more likely to be run as non-profit corporations when they are catered to specific cultural and/or religious groups.

Aligning with the 2024-25 program priorities, libraries and museums run as non-profit corporations are well positioned to connect older adults to programs and services, cater programming to underserved populations, and promoting the inclusion of all seniors by reducing accessibility barriers.



PARKS AND RECREATION ONTARIO

## First Nation Organizations

### Recommendation

PRO recommends that **First Nation organizations** be included as eligible prescribed entities under the new regulation and the definition of 'Indigenous communities and organizations' is **broadened** to include **all** Indigenous communities and organizations.

PRO applauds the inclusion of Indigenous communities and organizations in this proposed new regulation. Evidence demonstrates that the collective health and well-being of Indigenous communities is strongly tied to intergenerational relationships and knowledge sharing. Therefore, the inclusion of Indigenous communities and organizations as eligible prescribed entities will not only benefit older Indigenous adults and Elders, but also collective communities.

However, under the new regulation, we are concerned that First Nation organizations would not be eligible as prescribed entities. To clarify eligibilities, we recommend the definition be revised to include, (1) A First Nation community which is managed by elected councils according to the laws of the Indian Act; (2) An Indigenous (Inuit, Métis, and/or First Nations) community or organization.

Only [23% of First Nations people in Ontario live on reserve](#). Throughout Ontario, First Nations and intercultural Indigenous organizations already deliver targeted programming that serves older Indigenous adults and Elders in urban centres. [Friendship Centres](#) throughout the province offer [Life Long Care](#), a program that aids elderly urban Indigenous peoples in accessing transportation, opportunities for socialization, and emotional and spiritual supports. Similarly, independently run Indigenous organizations such as, [The Healing of the Seven Generations](#) (H7G) based in Kitchener-Waterloo, operate [programming](#) for older Indigenous adults that involves outings, social events, and other activities. Friendship Centres and organizations like H7G are not specifically Inuit or Métis entities – they serve all Indigenous peoples. Therefore, under the current proposed regulation these organizations may be excluded from eligibility as prescribed entities. First Nation and intercultural Indigenous organizations provide crucial culturally responsive programming to older Indigenous adults and Elders. Including these organizations as prescribed entities will enable them to expand programming, thereby reaching more older Indigenous adults and Elders across Ontario.

## Impacts to Current Entities

### Impact #1:

Expansion of prescribed entities beyond municipalities will cause the totality of funds to be spread thinly among successful applicants.

### Recommendation:

The Ministry should implement a comprehensive strategy for ongoing SALC funding increases to ensure a well-funded program that continues to be impactful in communities.

PRO supports the intention of this new regulation to increase service to areas of Ontario that do not currently have SALC programming. Additionally, the expansion of eligible prescribed entities will enable



## PARKS AND RECREATION ONTARIO

SALC programs to better deliver specialized services to underserved older adults and communities. However, with the expansion of prescribed entities moving beyond municipalities, the Ministry needs to be aware that the totality of funds available will be spread thinly among applicants. Therefore, the Ministry should implement a comprehensive funding strategy that ensures regular and ongoing increases to the SALC program that account for the expansion of eligible entities.

### **Impact #2:**

Expansion of prescribed entities beyond municipalities may cause oversaturation of programming.

### **Recommendation:**

The Ministry should grant funding priority to existing SALC entities and any newly approved SALC operators must demonstrate unique and distinct programming in the geographic area in which it is based as to not duplicate service and/or create competition for funding.

For many years, municipalities have successfully operated SALC programs that provide older adults with meaningful opportunities to socialize and engage in social and physical activities. The role that municipalities play in providing critical recreation opportunities for older adults cannot be understated. It is paramount that historically successful SALC programs do not experience decreased funding because of program eligibility expanding under the new regulation. During the application review processes, PRO recommends that SALC programs with historically high engagement rates be given funding priority. Additionally, we recommend that newly approved SALC programs operating in the same geographic area as existing SALC programs, must provide unique and distinct services. Implementing these limitations to the approval processes of new SALC programs will prevent programming oversaturation and competition for funds.

### **Impact #3:**

Newly prescribed entities may lack experience in working with older adults, leading to decreased program quality among SALC entities.

### **Recommendation:**

The Ministry should collaborate with PRO to explore opportunities to implement a consistent, quality assurance standard across all SALC programming in Ontario.

Many municipalities have extensive histories of providing programming for older adults and require program leaders to hold accreditations related to lifespan development and healthy aging. The proposed expansion of eligible prescribed entities may result in programming run by organizations who lack experience in working with older adults. Working with older adults requires a unique knowledge base and skillset.

PRO offers [HIGH FIVE® Principles of Healthy Aging](#) training programs, which provide insights into the unique needs of older adults when participating in recreation or leisure activities and uses an evidence-based approach to improve the experience of program participants. Through experiential learning activities, scenarios and group discussion, leaders of older adults gain knowledge, tips, and resources to enhance their programs as well as their relationships with participants. Topics include ageism, program



PARKS AND RECREATION ONTARIO

planning, as well as the importance that physical literacy plays in sustained long-term health, increased social connectedness, improved mental and physical well-being and a better quality of life.

PRO would be pleased to openly dialogue and collaborate with the Ministry around the inclusion of a quality assurance measure to be considered during the application and/or reporting process for SALC entities. We invite the Ministry to consider working with PRO to explore how we might support the implementation of consistent, quality assurance across SALC programming.

## Conclusion

High quality, accessible recreation opportunities are integral to healthy aging among older adults. Provided for the benefit of both individuals and communities, recreation is a public good, in the same way as education or healthcare. Quality recreation services need to be available to all older adults, sustainable, and supported at all levels of government, to enable lifelong participation.

PRO supports all Ontario communities in the pursuit of developing and furthering service provision to older adults, especially those who experience systemic inequities. We are pleased to discuss our comments further with the Ministry, should any clarity be required. Thank you for the opportunity to provide comments on this important proposal.

Sincerely,

A handwritten signature in black ink that reads 'S. Ane'.

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A handwritten signature in black ink that reads 'Kim Gavine'.

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