

December 14, 2016

c/o Charities Directorate  
Canada Revenue Agency  
Ottawa, Ontario  
K1A 0L5

Re: Political Activities Consultation

Dear Agency officials,

Thank you for the opportunity to provide input during the consultation process on the role that charities play in supporting Canadians to thrive and build bridges between their communities and the government.

The Association of Ontario's Health Centres (AOHC) is Ontario's voice for community-governed primary health care, representing 107 community-governed primary health care organizations such as Ontario's Community Health Centres (CHCs), Aboriginal Health Access Centres (AHACs), Community Family Health Teams (CFHTs) and Nurse Practitioner-Led Clinics (NPLCs). Our members serve some of the province's most marginalized and complex populations, such as: Indigenous, francophones, LGBTQ, racialized, recent immigrants, refugees, people with special needs and seniors, to give a few examples.

AOHC, as well as our members, believe good health is much more than something one can access in a medical clinic. We believe that better health begins in our homes, in our schools, in our workplaces, and in the communities where we live. Our goal is therefore to work toward a complete state of wellbeing for individuals, families and entire communities. As such, we find evidence-based ways to support our membership and shed light on strategies to address their client needs so that funders and other provincial decision-makers can hear those voices as well.

To reflect on the potential impact of the proposed changes in the legislation governing charities, we offer an example in the area of oral health: Ontario Health Insurance Plan (OHIP) does not cover health care for our teeth and gums. About 17% of people in our province (that is 2.3 million people) cannot afford to visit a dentist or dental hygienist. They experience pain and infection, and often have nowhere to turn but the emergency room, where they can get only painkillers and no treatment.

Research by AOHC using Ministry of Health and Long-Term Care (MOHLTC) data has found that there are almost 61,000 visits to hospital Emergency Room each year and 218,000 visits to doctors for dental pain and infection. This costs the healthcare system at least \$38 million annually. Since 2010, Ontario has been offering free public dental programs for children from low-income families, but they are not reaching enough kids. In 2014, the Ontario government promised to extend programs to adults on low incomes – but not until 2025.

AOHC wants the Ontario government to keep improving the Healthy Smiles Ontario program so that more children from low income families have access, and to move much faster on the promise to extend programs to adults and seniors on low incomes. AOHC has advocated to achieve this goal through official submissions, public statements, postcard campaigns, meetings with all political parties and so on.

This is put one example of the issues we are attempting to address and we are concerned that the potential changes in the legislation will limit our ability to advocate for the people in Ontario who are most vulnerable.

Therefore, we strongly support [Imagine Canada's submission](#) to the Canada Revenue Agency, including the following recommendations:

1. The *Income Tax Act* should be amended to restore an emphasis on charitable purposes, rather than regulating how charities achieve those purposes (activities).
2. These initial amendments to the *Income Tax Act* to focus on charitable purposes are a short-term solution to address the limitations on political activity and must be seen as only a prelude to broader legal and regulatory reform for the charitable and nonprofit sector.
3. There should be clarification of the definitions and scope regarding “partisan political activity” so that we can be more confident in engaging in our work.

Changes to the *Income Tax Act* should be made a priority; revising current definitions does not fully address the issue.

Thank you for the opportunity to express these recommendations and enabling us to strive toward the best possible health and wellbeing for everyone in Ontario.

Best regards,



Adrianna Tetley, Chief Executive Officer  
Association of Ontario Health Centres (AOHC)

Copy: The Honourable William Francis Morneau, Minister of Finance  
The Honourable Diane Lebouthillier, Minister of National Revenue  
AOHC Board of Directors  
Imagine Canada  
Ontario Nonprofit Network