



National leadership that supports a vibrant network of family resource agencies

Un leadership national au soutien d'un réseau dynamique d'organismes communautaires de soutien à la famille

18 November 2016

Charities Directorate
Canada Revenue Agency
Ottawa, Ontario
K1A 0L5

Political Activities by Charities - Consultation

Dear Sir/Madam,

FRP Canada (Canadian Association of Family Resource Programs) would like to add its voice to the ongoing CRA consultations regarding the Income Tax Act and the political activities of Canadian charities. On behalf of FRP Canada, I would like to support the Imagine Canada position on political activities by Canadian Not for Profits (NFP) and NFP charities, according to how the Act is currently constituted.

FRP Canada is a 40 year old charity that, through members in some 2300 communities across Canada, reaches half a million families a year, most living in conditions of risk. As such, we find we are constantly walking a fine line in efforts to advise different levels of government on policies and legislation that may impact children and their families. Our expertise in this sector is deep and our network wide, therefore FRP Canada can offer wise and non-partisan counsel. However, we frequently refrain from doing so for fear of running contrary to CRA rules and the Act itself, particularly during and following the *Continuance* process. Political and public policy discourse around issues affecting children and families is poorer for the lack of participation by FRP Canada and its NFP partners. This situation should at a minimum be clarified and in some areas rectified through legislative amendments to the Income Tax Act.

FRP Canada strongly agrees with the detailed recommendations of Imagine Canada and others on the need to bring much needed clarity to the definitions and scope around partisan political activity. Charities such as ourselves should not be afraid to contribute to important political and policy discourse, for fear of running afoul of the Act.

Specifically we advocate that:

- That the Income Tax Act be amended to restore an emphasis on charitable purposes, rather than how those purposes are achieved; and,
- That over time a broader legal and regulatory reform for the charitable and non-profit sector is required, spurred by wide-reaching discussion with experts, as well as Canadians-at-large, to define the level of civic participation and representation that Canadians expect from their charities.



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Charities play a key role in the lives of Canadians through efforts in areas that would be difficult for a government to directly undertake. Indeed, charities can and do help governments discharge their mandates and implement programs. Charities, as well as non-charitable NFPs, should be seen more as partners than adversaries to governments of the day: there is much to accomplish together on behalf of Canadians. The contribution by charities can be resolutely strengthened by a less restrictive ability to directly participate in non-partisan political and public policy/legislative deliberations.

Thank you for your attention and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kelly Stone', with a stylized flourish extending to the right.

Kelly Stone

Executive Director / Directrice générale

Canadian Association of Family Resource Programs (FRP Canada)

l'Association canadienne des programmes de ressources pour la famille



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cc: Ontario Nonprofit Network via info@theonnc.ca