



September 24, 2012

Honourable Laurel Broten
Minister of Education
Mowat Block
22nd Floor - 900 Bay Street
Toronto, Ontario M7A1L2

Dear Minister Broten:

**RE: Modernizing Child Care in Ontario:
Sharing Conversations, Strengthening Partnerships, Working Together**

Family Day Care Services has a long history of service delivery within the early learning and child care sector. Since its founding in 1851, our organization has been a leader in a range of services related to children and families and in the last forty years in the delivery of licensed home child care, centre-based child care and special needs services as well as family resource programs and Ontario Early Years Centres.

We value the opportunity **Modernizing Child Care in Ontario** presents to share ideas and promote discussions relevant to the future of high quality early learning and care in Ontario. Please find attached Family Day's feedback on this discussion paper. Our goal in responding was to provide a broad overview of what we feel the sector needs to remain healthy, strong and viable – during transition and in the future.

As part of our own response, we would like add our full endorsement of the Quality Early Learning Network's position on **Modernizing Child Care in Ontario**. We concur with the QELN's opinions and ideas regarding guiding principles and the steps necessary to modernizing the child care sector.

On behalf of Family Day, I am extending our appreciation at being invited to share in the conversation and to work together to strengthen partnerships across the sector as we work towards the transformation of early learning and care in Ontario.

Yours truly,

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Chief Executive Officer
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FAMILY DAY CARE SERVICES

MODERNIZING CHILD CARE IN ONTARIO:

Sharing Conversations, Strengthening Partnerships, Working Together

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Here are our broad recommendations for each of the five categories outlined in the discussion guide. Although we could respond in detail to each of the questions posed in *Modernizing Child Care in Ontario*, we fully endorse the specific recommendations developed by Quality Early Learning Network. At this point in time we believe the government's first step should be to make a clear commitment to provide today's modern families with access to a range of child care service options. The implementation of full-day kindergarten is an important first step towards supporting families but modern families require much more in terms of their child care options. We believe that all children in Ontario should have access to a range of child care services that are delivered by responsive, family-centred, non-profit or public organizations.

1. Operating Funding

Family Day believes the first step towards modernizing the early learning and care sector is to review and change the funding mechanisms for child care. Family Day supports the recommendations for significant additional investments and a new, coherent base funding model outlined in *SOLUTIONS*, the February, 2012 paper issued by the Quality Early Learning Network . We encourage the government to move forward with comprehensive funding reform that will address the funding imbalance in the system.

2. Capital Funding

We recommend that the CMSMs/DSABs should lead a service system planning process to determine the allocation of capital funding. The planning process should include boards of education, local departments of health and recreation and non-profit service providers of licensed child care in each community. It is critical that the government ensures that funding is planned and rolled out in a manner which allows for sufficient needs assessment of each community and of the child care service providers who are impacted by FDK.

Boards of Education currently operate with a cost-recovery perspective and treat child care services as tenants rather than integral partners. Given the discussion guide's stated objective of introducing a schools-first capital retrofit policy, it is critical that the government ensures that schools are viewed as public assets. The schools must be available year-round and allow child care services to have access to a broad range of the school facilities.

Because schools will not have the full capacity to meet the demand necessary for all licensed child care in Ontario, community-based, non-profit child care which is not located in schools should have the opportunity to access government loans and funding mechanisms which will further support services for families.

3. Quality Programs

Program guidelines and evaluation of quality programs should be based on existing research and evidence. We recommend using the 2005 **ELECT** document as the foundation for child care programming, program evaluation and for ongoing professional development and education for the early learning and care sector.

As the child care system stabilizes and continues through this time of transition, we recommend a continued commitment to further research and study of the impact of high quality early learning and child care programs.

4. Modernized Legislative and Regulatory Framework

Standards for early learning and care environments should be established in keeping with best practices related to health and safety. The regulations should be developed in accordance with provincial health and safety standards with some modifications allowed for local community health standards. We strongly encourage the government to focus on the current licensed sector with a long term goal of ensuring that all individuals who provide child care in their home for unrelated children and remuneration should be part of the licensed child care system. In this area, Family Day is in support of the position of the Home Child Care Association of Ontario.

The system of licensing and quality measures needs to be interrelated with a clear knowledge that the staff who are licensing are well educated and informed on various models of curriculum and from program quality measures. Agencies must provide a curriculum model consistent with the **ELECT** document and have in place mechanisms to measure the quality of programs and be responsible for reporting on those measurements on an annual basis. We recommend using an agency-wide risk management approach that would license agencies and hold them accountable for ensuring compliance to provincial health and safety standards. In addition to meeting licensing requirements, agencies would have to demonstrate that they had a model of curriculum and a model of measurement in place.

5. Support for Accountability and Capacity Building

Child care operators working within the current system have had to operate within a context of reduced funding and a confusing, complex array of legislation and regulations inconsistently applied across various regions. In a well-funded, stable system that is base funded, organizations should be encouraged to work together to strengthen and share infrastructure and resources in a broad range of areas including human resources, quality measurement, health and safety, finance practices and information technology.

Currently, organizations that offer child care as only one of their services, may be evaluating their agencies as a risk management requirement or through an accreditation model. Those types of mechanisms should be considered appropriate to assess the overall ability of an organization to manage its systems and demonstrate accountability.