



Home Child Care Association of Ontario
Association Ontarienne de garde d'enfants à domicile

September 24, 2012

Minister Laurel Broten
Child Care Modernization
c/o Early Learning Division
Ministry of Education
22nd Floor, Mowat Block, 900 Bay Street
Toronto, ON
M7A 1L2

Dear Minister Broten:

The **Home Child Care Association of Ontario** is pleased to provide this response to **Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together**, released by your Ministry in June 2012. Our association is grateful for the commitment that government has demonstrated, through the release of the discussion paper, to addressing the challenges facing the sector.

Our response to the paper will only address the issue of home child care, though our member agencies are submitting comprehensive responses dealing with all the issues raised in the discussion paper.

The **Home Child Care Association of Ontario** is deeply committed to facilitating the provision of high quality early learning and care experiences for children ages 0 – 12 years in the homes of independent contractors across Ontario. Providers are caring for children in urban, suburban and rural communities, in high-rise apartments, town homes and single-family dwellings. This diversity, along with flexibility and culturally responsive care, makes licensed home child care the choice of families for more than 30,000 children.

Many of our member agencies are submitting individual agency-based responses to the *Modernization* paper. Their responses will assist in addressing some of the significant differences between urban, suburban and rural areas of the province. There is a high degree of consensus among our members about the importance of regulation and accountability.

The Association is committed to working with the Ministry of Education to increase accountability within child care programs in homes in Ontario, help stabilize the child care system and ensure that families have quality options for their child care needs. The Association recommends a phased-in approach.



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The first phase is very simple:

1. All home based child care should be governed by the same legislation as licensed child care.
2. Phase 2 is to promote Agency licenses/permit/certificate. Establish the ideal standards for the agencies, operators, and childcare providers.

The Home Child Care Association of Ontario represents more than 70 Licensed Home Early Learning and Child Care Agencies. The membership of the Home Child Care Association of Ontario is deeply committed to the well-being of children and their families and so we have a strong interest in how programs and services for children are organized and delivered throughout the province. We believe that we have the capacity to strengthen the home child care system.

HCCAO is committed to working with the Ministry throughout the Modernization process to ensure that the families and children in Ontario benefit from a regulated, monitored, early learning and child care system. We look forward to the opportunity to explore with your Ministry options for consideration regarding Licensed Home Child Care in Ontario.

Respectfully,

Marni Flaherty
President of the Home Child Care Association of Ontario
www.hccao.com

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MODERNIZING CHILD CARE IN ONTARIO

HOME CHILD CARE ASSOCIATION OF ONTARIO

Context

The **Home Child Care Association of Ontario** is deeply committed to facilitating the provision of high quality early learning and care experiences for children ages 0 – 12 years in the homes of independent contractors across Ontario. Providers are caring for children in urban, suburban and rural communities, in high-rise apartments, town homes and single-family dwellings. This diversity, along with flexibility and culturally responsive care makes licensed home child care the choice of families for more than 30,000 children.¹

Many of our member agencies are submitting individual agency based responses to the *Modernization* paper. Their responses will assist in addressing some of the significant differences between urban, suburban and rural areas of the province. There is a high degree of consensus among our members about the importance of regulation and accountability. For example, all home child care agencies support a system wherein all Ontario's children who are cared for in the home of someone other than a parent or relative, deserve to be in licensed home child care. A list of member agencies is appended to this paper. (Please see Appendix One.)

While the **Home Child Care Association of Ontario** recognizes the critical need to move expeditiously on the Modernization process, we strongly believe that there are some sector specific challenges facing the licensed home child care sector. It is essential that there be a comprehensive discussion between the government and the **Home Child Care Association of Ontario** about how to bring more providers into the licensed system, increasing accountability with respect to safety for those in the informal sector and to move forward in ensuring that all children and their families are able to access high quality early learning and care.

The Home Child Care Association of Ontario believes:

¹ This number includes the children in the licensed care home child care system as well as additional children that providers are caring for who are receiving the benefits of the licensed system.

- Quality in home-based care is achieved through enforcement of licensing standards, on-going monitoring by professional staff, fair remuneration, training, education and social support.
- Licensing standards should apply to all home-based child care providers because every child cared for in a home-based setting deserves the protection of these standards.
- All children should have equal access to quality care.
- Providers should receive fair payment.

Goals of the **Home Child Care Association of Ontario**:

- To encourage and promote communication among individuals, groups, corporations, organizations, federal, provincial and municipal authorities engaged in the planning, financing and delivery of home child care services.
- To encourage and promote the development of policies and programs in the home child care field.
- To encourage and promote the adoption and maintenance of appropriate standards of practice in the provision of home child care.
- To encourage and promote the continuing education and development of all individuals, groups, corporations, organizations and federal, provincial and municipal authorities involved in the provision of home childcare.
- To encourage and promote social action as appropriate.
- To encourage and promote research in the home child care field.

Our Key Messages:

- ✓ The provision of quality care remains critical; regulatory changes must support the provision of quality early learning and care experiences for children.
- ✓ Promoting the financial viability of the licensed home child care sector is important.
- ✓ Parental choice must be upheld; the scope of the licensed home child care sector must be expanded to ensure parents may choose from a range of home-based options for the care of their children and that each of these options meet government standards.
- ✓ The Ministry of Education is encouraged to apply the same regulations to the informal, unregulated sector as to the licensed home child care sector.
- ✓ The safety of the children must never be compromised.
- ✓ The Day Nurseries Act and accompanying Regulations must support inclusiveness.

It is within this context that the **Home Child Care Association of Ontario** submits the following brief response to the questions directly related to home child care. We look forward to working closely with the government to move this important process forward in a thoughtful, planned manner that builds on existing strengths and effectively addresses current challenges.

A Changing Early Learning and Care Environment

The **Home Child Care Association of Ontario** is fully cognizant of the need to address the challenges facing the licensed early learning and care sector in Ontario. Its member agencies are not immune to the consequences of an outdated funding mechanism, the impact of the introduction of full day kindergarten and the challenges of working within the constraints of a regulatory environment that establishes minimum standards and may no longer reflect the current lives of parents and their children. For example, extended maternity and paternity leave policies have made a difference in the age that infants enter the licensed child care system. This is just one of the changing realities that should be considered as the Modernization process moves forward.

Modernization of our sector is well overdue and the reality that the government has recognized this is an important step forward. It is essential to build on what works and to move forward in a way that supports and enhances access to high quality early learning and care opportunities for children and their families.

There are thousands of children on waiting lists across the province and many more thousands whose parents have simply given up on the possibility of accessing affordable, high quality early learning and care. The research is definitive about the value of high quality early learning and care to young children and their families and our shared knowledge of this fact must form the basis of the modernization process.

Guiding Principles:

The document *Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together* identifies five major guiding principles:

- 1) Support and choice for children and families.
- 2) Commitment to quality programs for all children.
- 3) Efficient funding formula.
- 4) Supportive legislation and regulations.
- 5) Evidence-based decision making and reporting.

The **Home Child Care Association of Ontario** strongly supports the principles guiding the development of the modernization paper. An ongoing commitment to these critical principles will be an essential component of a successful modernization process.

Moving Forward

Modernized Funding

The **Home Child Care Association of Ontario** fully supports the recommendations outlined in the 2012 report authored by the **Quality Early Learning Network** entitled *Solutions – How the Ontario government can rescue and ensure the viability and quality of the province’s child care system*. This report provides a comprehensive

strategy to completely revamp existing funding mechanisms in the child care sector. We urge the government to implement the recommendations made in the [Solutions](#) paper.

Specifically with regard to home child care, we recommend that Ontario increase investment in licensed home child care so that the sector can recruit and retain qualified caregivers. The ultimate goal is to insure that all providers are part of the licensed system giving all children the benefit of attending a home that is regulated and monitored.

Modernized Regulatory and Legislative Framework

The **Home Child Care Association of Ontario** believes that within a modernized early learning and care sector ALL providers who care for other people’s children for payment will be part of a licensed child care system.

Modernization of the early learning and child care sector will require a phased-in approach. In the first phase of this process, we recommend new regulations be enforced so that providers in the informal, unlicensed sector are able to care for fewer children than those who are providing care as part of the licensed child care sector. The **Home Child Care Association of Ontario** recommends an immediate regulatory change that limits the number of children to four (4) including the provider’s children under the age of six (6) with an additional requirement that informal providers have the same age grouping restrictions as those in the licensed sector.

Furthermore, since the process for bringing all providers into the licensed system is complex, the **Home Child Care Association of Ontario** would welcome the opportunity to meet with the Ministry of Education to explore how best to implement this transformation of home-based care.

To fully modernize the licensed home child care sector, the **Home Child Care Association of Ontario** recommends the following changes that build on the existing model of a single caregiver (independent contractor) providing care in her own home, supported by a licensed home child care agency.

1. Allow for two caregivers (both independent contractors) providing care in a single home, supported by a licensed home child care agency.

- a. One provider must be a Registered Early Childhood Educator.
- b. The second provider must be over the age of 18 and have basic first aid training.
- c. Any two provider home must have a contract for services with a licensed home child care agency.
- d. Agencies will be responsible for demonstrating that all quality indicators can be achieved in the two provider home. (space, safety, quality of program delivery, addressing parent and child needs)

2. Provision of care for children with special needs to ensure that the licensed child care sector is inclusive.

- a. The true spirit of integration must be the driving force behind the placement of children with identified special needs.
- b. Update the current discriminatory language in the *Day Nurseries Act*.
- c. The *Day Nurseries Act* and funding models must recognize that in some instances a child's needs may be so complex that fewer children can be cared for in the home. Providers must be compensated appropriately (not be penalized) for caring for children with significant special needs.
- d. The compensation for caring for children with special needs should not impact parent fees. (Providers should be supported and compensated to care for children with special needs in a way that does not have an impact on parent fees.)
- e. All children have unique needs, and in the case of children with special needs, the care needs may be significantly higher. This must be addressed within the context of regulations. For example, children with complex medical needs will require additional supports and funding.

Providers who are both willing to, and capable of, meeting the needs of these children must receive both financial and logistical support to do so.

3. Regulating Professional Development Requirements

The review of the *Day Nurseries Act* and accompanying regulations opens the possibility of recognizing the importance of ongoing professional development to the provision of quality care. The **Home Child Care Association of Ontario** urges the government to make a regulatory change that mandates a minimum number of hours of professional development for providers on an annual basis.

Conclusion

The **Home Child Care Association of Ontario** looks forward to further discussion with the Ministry as the modernization process moves forward. We urge the government to take this opportunity to address the crisis facing the early learning and care sector in a manner that will allow for an expanded system to better meet the needs of families as provincial finances allow. A temporary fix in this time of constraint will simply serve to exacerbate the child care crisis.

Our member agencies have put considerable thought and energy into their responses to the questions posed in the modernization paper. The experiences of these agencies in rural, suburban and urban communities may be different but their commitment to the well being of children and families is universal. Their responses to the questions reflect this strong commitment.

Home Child Care Association of Ontario 2012 Membership

Kreative Kids Private Home Daycare Agency - Orangeville

Andrew Fleck Child Care Services - Ottawa

HCCAO

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Response to Modernization Paper

Final

September 19, 2012

Bruce County Home Child Care Program - Walkerton

Canadian Mothercraft of Ottawa Licensed Home Child Care - Ottawa

Caring for Kids Non Profit Private Home Day Care - Mississauga

Centre pour enfants Timiskaming Home Child Care - Haileybury

Centrepointe Child Care Services - Ottawa

Cherish Private Home Child Care - Milton

Child Care Algoma - Sault Ste Marie

Children's Resources on Wheels Licensed Child Care - Smith Falls

Children's Village of Ottawa-Carleton - Ottawa

ChildSPEC Licensed Home Day Care Services - Brampton

Circles in the Sun Home Child Care Services - Toronto

City of Brantford Child Care Services, Private Home Day Care - Brantford

City of Cornwall Private Home Daycare - Cornwall

City of Thunder Bay Private Home Day Care - Thunder Bay

City View Centre for Child & Family Services - Nepean

Community Child Care of Ottawa - Kantana

Community Home Child Care - London's Children Connection - London

County of Grey Home Child Care Program - Owen Sound

County of Wellington Child Care Services - Private Home Day Care - Guelph

Day Care Connections - Toronto

Dream Weavers Day Care Inc. - London

Durham Professional Home Day Care Inc. - Pickering

Family Day Care Services - Toronto

Family Space Quinte Inc. - Belleville
Fort Frances Private Home Child Care Program - Fort Frances
Galt Day Care Services Inc. - Cambridge
Global Child Care Services - Ottawa
Great Beginnings Home Child Care - Windsor
Haldimand-Norfolk R.E.A.C.H. - Townsend
Halton Day Care Services Inc - Milton
Hand in Hand Home Childcare Services Inc. - Scarborough
Happy Face & Mallow Day Care Centre Ltd. - Toronto
Hearst Familycare Agency - Hearst
Heritage Home Child Care Services - Scarborough
Home Child Care Program - Parry Sound District Social Services - South River
Hopscotch Home Daycare Agency - Newmarket
Huron County Community Child Care - Clinton
J & F Home Day Care Services Inc - Toronto
Jubilee Heritage Family Resource - Village Home Child Care - Sudbury
Kiddie Kare Day Care Services Inc. - Mississauga
Kids Kare Home Day Care Agency Ltd. – Brampton
Kids R Gems Day Care Ltd. - Barrie
Lambton Rural Child Care - Petrolia
Les services a l'enfance Grandir Ensemble - Ottawa
London Smiles Day Care Services - London
Macaulay Child Development Centre - Toronto

Manitoulin Family Resources Inc. - Mindemoya
Metcalfe Home Day Care-Rural Family Connections Inc. - Metcalfe
Military Family Resource Centre - Ottawa
Mini Minders Inc. - Aurora
Municipal Home Child Care - Ottawa
Network Child Care Services - Toronto
Niagara Region Home Child Care Program - Thorold
Northern Treasures Licensed Home Child Care Program - Timmins
ODAWA Sweetgrass Home Child Care Agency - Ottawa
Oxford Community Child Care Inc. - Woodstock
Parents' Home Child Care of Ottawa - Ottawa
Perth Care for Kids Home Child Care - Mitchell
Prescott Russell Child Care Agency- L'Orignal
Region of Waterloo Home Child Care - Waterloo
Rexdale Home Child Care Agency - Etobicoke
Simcare Childcare Services - Orillia
The Corporation of the County of Simcoe Family Day Care - Midhurst
The Infant Care Services Inc. - Toronto
There's No Place Like Home Inc. - Toronto
Today's Family – Caring for Your Family - Hamilton
Toronto Home Child Care Agency - Toronto
Twinkle Stars Private Home Day Care Services - Toronto
Wee Watch Enriched Home Child Care - Ottawa

West End Home Child Care Services - Toronto

West Nipissing Child Care Corporation Home Based child Care - Sturgeon Falls

YMCA of North Bay Private Home Childcare - North Bay

York Professional Care & Education - Aurora