

April 11, 2018

**Six steps to immediately resolve the concerns inherent in the
BC NDP 2018/2019 child care plan**

It is commendable that the BC government is making child care an important platform for the next three years. BCCCOA is excited about the possibilities for child care with the current budget, and visions a diverse, inclusive, cohesive and high-quality child care system throughout the province.

Rushing to implement the first stages of this plan occurred without consultation directly with the providers of child care in the province - causing divisive fractures within the child care field. In order to move forward, child care providers and the BC NDP must come together to collaboratively contribute to the creation of a made-in-BC plan.

The BCCCOA calls for the BC NDP to:

1. Immediately implement BCCCOA's proposed "Six Simple Steps" in order to resolve the concerns child care stakeholders province wide have raised in response to the 2018/2019 funding cycle CCOF and CCFRI contract.
2. Immediately begin a transparent, inclusive and proportionately representative consultation with child care providers in BC to collaboratively develop an implementation plan towards universal child care in BC.

Pamela Wallberg, ECE, Infant-Toddler, BFA, MA
BC Child Care Owners Association
Acting Chair

Six steps to immediately resolve the concerns inherent in the BC NDP 2018/2019 child care plan

Action Step One: Amend licensing regulation to increase infant-toddler care in BC

A. Amend licensing regulations to add a category in licensed group child care (30 months to school age), reading:

Group child care - (30 months to school age) - maximum group size 25, with not more than 4 children younger than 36 months old in a single group -

≤ 8	One infant-toddler educator
9 – 16	One infant-toddler educator, one educator
17 – 25	One infant-toddler educator, one educator, 1 assistant

B. Amend licensing regulations to add a new Care Type:

Group child care - (18 months - 36 months) - maximum group size 10

≤ 5	One infant-toddler educator
5 - 10	One infant-toddler educator, one educator

C. Amend licensing regulations to provide additional categories in licensed multi-age child care:

Multi-Age Child Care - maximum group size 8, having no more than 6 children younger than 36 months old and, of those 6, no child younger than 18 months old.

One infant-toddler educator

In-Home Multi-Age Child Care - maximum group size 8, having no more than 6 children younger than 36 months old and, of those 6, no child younger than 18 months old.

One infant-toddler educator

Multi-Age Child Care - maximum group size 8, having no more than 6 children younger than 36 months old and, of those 6, only 1 child younger than 18 months old.

One infant-toddler educator
One assistant

In-Home Multi-Age Child Care - maximum group size 8, having no more than 6 children younger than 36 months old and, of those 6, only 1 child younger than 18 months old.

One infant-toddler educator
One assistant

Rationale:

Increases infant-toddler care without the need to build new centres. The province-wide average vacancy for child care in 2016 is 30.9 %. (Fraser institute report)

Initial findings, BCCCOA Child Care Provider Demographics in BC (in publication) suggest that this would create 1963 of spaces for children under 36 months without requiring any new centres to be built in Surrey alone.

New licensing regulations would remain within Canadian standards of quality for ratios and group sizes (see: SASK, AB)

Allows for more flexibility in providing licensed programs to meet demand and needs in communities

Action Step Two: Amend Child Care Fee Reduction Initiative so that all parents in BC can access funding

Amend access so that parents who provide in-home care (FCC or IHMA) are able to access the CCFRI for their own child (ren) who are registered and occupying a licensed child care space within their program

Rationale:

A mother running an in-home licensed care program will be unable to access the Fee Reduction Initiative funding for her own child. Licensing regulations require a mother running an in-home licensed program to enrol any child under the age of 12 who lives in the home within the program - preventing her from accepting other children, but now equally preventing her from accessing the CCFRI funding.

Ironically, BC MLA's voted on March 8, 2018 to allow their own children on the floor of the legislature - we are assuming that MLA's are paid for their work while on the floor of the legislature. Similarly, public schools receive government funding for students who are taught by their own parents.

Action Step Three: Ensure all licensed child care providers are given equal access and opportunity to receive Major and Minor Child Care Capital Funding

Rationale:

The vast majority of child care spaces in BC are created by private operators, using private funds or securing personally guaranteed loans, which result in higher fees. 79.9 percent of child care operators in BC are private operators (MCFD, Child care programs and services, report 2010/2011). Supporting all providers in opening child care spaces will ensure that the most possible spaces are opened in a timely manner in BC. This is inline with the UN recommendations for governmental funding support to all provider types within the BC child care system.

Action Step Four: Amend qualification requirements to include a 1 year ECE Assistant license to practice (LTP)

Amend qualification requirements to include a non-renewable 1 year ECE Assistant license to practice, to be inclusive of any individual who has completed a bachelor's degree or diploma program in a related field:

Child and Youth Care
Community Rehabilitation
Disabilities studies
Education
Educational Assistant
Human Ecology
Family Studies
Kinesiology
Nursing
Psychology
Social Work
Tourism and Recreation
Therapeutic Recreation

Rationale:

There is an extreme ECE shortage in BC, and centres are regularly gaining staffing exemptions.

The exemption process is time consuming for Licensing officers and deters many potential job applicants. BC created the 1 year ECE LTP (2009) to allow educators to work while they are gaining their 500 work hours; this would create a similar program for ECE Assistants,

immediately increasing the potential workforce. Many applicants to the registry with these qualifications would already be approved for an ECE Assistant either through an exemption through their licensing officer or by evaluation of their education (which is also time consuming and utilizes unnecessary staffing resources)

This shifts the LTP requirements for an ECE Assistant in BC to be closer aligned to those of Alberta, without jeopardizing BC's overall higher training requirements. It is further reflective of BC's commitment to the Canadian Free Trade Agreement which automatically recognizes LTP equivalences between BC and Alberta.

Action Step Five A: Child Care tuition fee transparency

Require child care providers to advertise, report and collect child care fees as a "Comparable Base Tuition" rate using the following formula and terms. Include this data to be reported within the 2018 CCOF required survey.

Amend the CCOF and CCFRI contracts to require all operators to advertise, report and collect child care fees in this manner.

Terms

Base Tuition: refers to the amount charged for the maximum hours of care a child may attend without incurring additional fees. A minimum of 6 hours of care must be included.

Extended Care Tuition: refers to amount charged for care provided in addition to the base tuition hours.

Nutrition Fee: refers to an additional fee for snacks and lunch. This fee may or may not be an optional cost for families

Transportation Fee: refers to an additional fee for program transportation. This fee may or may not be an optional cost for families

Supply Fee: refers to any additional fees for program supplies, such as art, sport or diapering supplies. This fee may or may not be an optional cost for families.

Total Fee: refers to the total fee a family will pay for child care, in a monthly or daily calculation

Comparable Base Tuition: refers to the resulting rate once all base tuition factors and variations are accounted for as per the Comparable Base Tuition calculation and the resulting values are averaged.

Rationale:

The current system for charging child care fees is erratic and confusing for families. It is not necessarily based on centre operating costs, and focuses unduly on market competition. Adding transparency and a framework to understand child care fees is a strong step towards market stability.

Action Step Five B: Accurately calculate the regional median child care rates

The regional median “fee” calculated for the CCFRI “opt in” program to establish a means to compare programs within a geographic region should be based on Comparable Base Tuition rates only, given the diversity of programs in any given area.

Formula

Where BT = Base Tuition

H = daily hours reflected in the Base Tuition amount

BTD = Base Tuition when charged as a daily rate

BTM = Base Tuition when charged as a monthly full time tuition

BTM# = Base Tuition when charged as a monthly tuition based on the number of days per week registered (where # refers to the number of days per week)

WR = number of part time rate categories (4 if there are charge options for 1, 2, 3 and 4 days per week)

CBTA = Comparable Base Tuition for Schedule A tuition options

CBTB = Comparable Base Tuition for Schedule B tuition options

CBTC = Comparable Base Tuition for Schedule C tuition options

CBT = Comparable Base Tuition

Tuition Options	Description	Formula
Schedule A:	Daily charge (and/or drop in charge)	$BTD/H * 6 = CBTA$
Schedule B:	Monthly full time rate	$BTM/(20*H) * 6 = CBTB$
Schedule C:	Part time rates based on the number of days per week	$(BTM1/4 + BTM2/8 + BTM3/12 + BTM4/16)/(H*WR)$

$$CBT = (CBTA + CBTB + CBTC)/3$$

(or average of all CBT's if not all tuition options are available)

Rationale:

The current proposed “median fee” calculation is not reflective of equivalent comparisons. Calculating a median Comparable Base Tuition rate only, and prohibiting unauthorized increases to this rate, provides a balance between free-market child care rates and regulated child care rates.

Action Step Six: Wage increases

Immediately ensure that the Labour Market Partnership Steering Committee engages in consultation and gathers data in a way that is both geographically and care-type representational. Historical consultation has focused on special interest groups and has not been proportionately representational.

Continuous consultation should include geographic and care-type proportionate representation. The November “stakeholders” consultation should be re-convened with appropriate representation and without special interest groups. The provincial child care advisory council should be adjusted so that active council members appropriately represent child care in British Columbia and special interest groups should not hold a space on this council.

Rationale:

Educator training, recruitment, retention and compensation is vital. The child care industry is in crisis. Accurate data is required immediately in order to create a sustainable action plan.

To have a made-in-BC child care plan, actual stakeholders should have an active voice in all consultation and advising.