



A Child Care System for Today and Tomorrow

**Submission to the Early Learning Division, Ministry of Education,
Consultation on Modernizing Child Care in Ontario**

**YWCA Canada & Member Associations:
National Capital Region YMCA-YWCA
YMCA-YWCA Guelph
YWCA Cambridge
YWCA Hamilton
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YWCA Canada and our Ontario Member Associations who provide child care services – National Capital Region YMCA-YWCA, YMCA-YWCA Guelph, YWCA Cambridge, YWCA Hamilton, YWCA Kitchener-Waterloo and YWCA Toronto – applaud the Government of Ontario’s long-term vision “to build a high-quality, accessible and coordinated early learning and child care system” for Ontario. Achieving universal access to quality, affordable child care is a high priority for YWCA Canada and essential to women’s equality. As YWCA Canada’s 2011 report, *Educated, Employed and Equal: The Economic Prosperity Case for National Child Care* revealed, over the last 30 years women have reversed the gender gap in education and closed it in employment numbers. Given these trends, the social policy and program gap on early learning and child care is decades behind reality. Closing it is necessary not only to supporting Ontario’s children but also to the economic prosperity of the province. A modern early learning and child care system supporting children ages 0-12 is a social necessity.

In assigning provincial funding for child care, the government of Ontario should take into account evidence from a recent detailed review of Quebec’s child care system¹ which revealed a 22% increase in women’s employment since implementation, adding \$5.1 billion to the provincial economy and reducing the number of single mothers on social assistance from 99,000 to 55,000.

The consultation questions are answered in detail below, YWCA Canada would like to highlight the following key points:

- Viability of the community provider sector is at stake. Given current conditions and constraints, community providers are hard-pressed to generate viable models for child care provision. Loss of four-and-five-year-olds cannot be compensated solely by expanding infant care, and implementing a modernized child care system that serves the needs of 0-12-year-olds will have to include a viable community provider sector.
- The *Day Nurseries Act* needs to be updated and aligned with the *Education Act* to level the playing field for childcare providers and schools. This process should include direct consultation with directors and supervisors of child care centres to ensure understanding of the implications of regulations for day-to-day centre management.
- Child care for special needs children is under-funded and inadequate to support their best care, whether they are physically disabled children with medical needs, developmentally disabled or trauma survivors.

¹ Source to be completed

In addition to the recommendations noted in this submission, the sponsors endorse the recommendations for the *Day Nurseries Act* in the YMCA's presentation, *For Ontario's Children: Building An Integrated and Efficient Early Learning & Child Care System*.

1) Operating Funding Formula

Objective: To modernize the approach to operating funding within the next three years, the government will develop and implement a new more transparent approach to funding that responds to demand for services, helps stabilize fees and improves reliability of child care to better support child care operators and parents.

- **How can the approach to child care funding be revised to enable more transparent and efficient allocations to municipal service system managers and First Nations?**

Full Base Funding

The new formula should implement full base funding, calculated on an annual budget for all regulated non-profit and public programs. This province-wide formula should take into account:

- type of service
- age groups
- licensed number of spaces
- actual enrollment
- special needs enrollment.

Payments should be made to child care centres on a monthly basis, and the full operating budget would be paid by the local municipal service manager. Parent fees would be set on a sliding scale based on income and paid directly to the municipal service manager.²

Annual Increase

The funding formula should incorporate an annual increase that reflects increases in fixed costs including, but not limited to staff salaries, rent and utilities.

Stipulate Salary Portion

The provincial government should stipulate the portion of the funding to go to salaries to ensure the portion of funding operators devote to salaries is sufficient.

Level the Playing Field

The significant salary gap between community-based ECEs and school-board-based ECEs makes it very difficult for community-based providers to attract and retain the best possible staff. The salary gap needs to be diminished.

² See Quality Early Learning Network, Solutions: How the Ontario government can rescue and ensure the viability and quality of the province's child care system, 2012.

- **What elements should be considered when developing a new funding formula (e.g. demographics, demand, costs)?**

Care for Infants & Toddlers

It is increasingly difficult for providers to finance care for infants and toddlers (0-3.8-year-olds). Child care for this age group requires investment to ensure continued availability and accessibility. This review should include consideration of a different funding formula for providers who are only caring for 0-3.8-year-olds. Given many school boards have not expressed interest in providing care for infants and toddlers, the funding formula needs to ensure community providers are able to care for this age group.

Retrofitting funding should be made available and incentives should be provided to school boards to support retrofitting school space to enable third party community providers to provide care to 0-3.8-year-olds.

- **How can current funding be streamlined or consolidated to improve flexibility and efficiency?**

The full base funding formula suggested above would effectively streamline funding. Weighting funding toward the number of licenced spaces in a centre, over the number of spaces occupied will help address funding issues raised by ratios when spaces are unoccupied. For example, a room licenced for 16 preschoolers with several spaces unfilled and would still require two staff to maintain the ratio. Funding could also be streamlined by rolling pay equity, wage enhancement, wage improvement and one-time health and safety funding into the formula.

2) Capital Funding Priorities

Objective: To support child care operators as they adapt to FDK over the next three years, the government will pursue a capital funding approach that emphasizes child care spaces in schools in order to increase seamlessness for children and convenience for families.

- **How can the Ministry of Education facilitate collaboration and joint planning among school boards, service system managers and child care operators so they can plan and manage this approach?**

Include child care operators in the long-term visioning for these school-based centres and harmonize policies for use of school space. Regulations should be consistent across the school and school-based child care centres, including:

- Health department regulations
 - Use of playground equipment
 - Duplication of registration and documentation, including immunization.
- **What supporting policies are required to ensure the success of a schools-first child care policy (e.g. long-term planning on space for school-based operators, reasonable accommodation costs, facilitators, and other shared space issues)?**

Remove capital replacement costs from child care providers for centres to be built in schools as buildings will be owned by the school boards in perpetuity. The Ministry of Education should provide funding for the entire building, including major renovations and upgrades as needed. These could be done in conjunction with other school maintenance and renovations.

- **Where school-based space does not meet community needs, are there additional capital tools that could support community-based child care operators?**

Review of the *Day Nurseries Act* should include review of the physical space licensing requirements, as they are currently so exacting as to pose a barrier to space conversions.

3) Quality Programs

Objective: Over the next three years, the government will work to enhance program quality and consistency by developing mandatory provincial program guidelines for child care operators. We will also develop an updated framework to support children with special needs and offer new resources and information for parents and providers.

- **Based on your experience and knowledge of existing research and evidence, how can provincial program guidelines support program quality?**

As noted above, the *Day Nurseries Act* needs to be evaluated, updated and harmonized with the *Education Act* and this process should include extensive input from the sector. Current issues include:

- division of age groups
- ratios
- physical space
- equipment
- staff qualifications.

In addition we direct attention to the extensive recommendations in the YMCA's presentation, *For Ontario's Children: Building An Integrated and Efficient Early Learning & Child Care System*.

- **How can program quality be demonstrated and connected to the licensing process?**

Checklists are recommended as a mechanism to demonstrate program quality and connect to licensing. We recommend investigating the Raising the Bar quality initiative which is now operating in a number of Ontario communities. The initiative aims "to increase the standard of care above the minimum set by the *Day Nurseries Act*" as discussed in the submission to Modernizing Child Care in Ontario by YWCA Cambridge.

- **What additional tools or professional development opportunities would be helpful to support ongoing quality improvement?**

Professional development days similar to those provided to teachers are recommended for child care centre staff (ECEs).

- **What components of the special needs resourcing program should be reviewed and streamlined (e.g. eligibility criteria, services provided, qualifications for resource consultants)?**

The importance of investing in resources for special needs must be emphasized. Special needs are currently underfunded. Some YWCA Member Associations fundraise to support the large number of children they serve with special needs. Children who have witnessed and/or experienced violence, homelessness and other trauma have special needs that are not currently funded. Research indicates early intervention with these children is effective and a good use of resources. Centres struggle to fund staff to support special needs children with high physical needs, some of whom receive extra support in school but not in child care. Unsupported needs include high-functioning autism. Resource aides should be trained and meet a standard.

- **What resources about program quality could the government develop to help parents make choices about care?**

A well-resourced and easy to access website with checklists for parents would be a positive step. Parents should be consulted for input on developing such a site, perhaps through partnering on development with the Ontario Coalition for Better Child Care and their members.

4) Modernized Legislative and Regulatory Framework

Objective: To put the child care sector on the path toward modernization over the next three years, the government will propose legislative and regulatory amendments to reflect up-to-date evidence and experience and to support health, safety and quality for children, parents and providers.

- **How should standards be updated to improve health, safety and overall quality in child care?**

As discussed above, the *Day Nurseries Act* needs to be updated and modernized with input from child care centres. Sections and provisions that are no longer appropriate should be removed or amended. The government should consider centralizing immunization records.

- **How can the government reduce duplication and overlap in requirements for licenced child care providers?**

Duplication can be avoided by not requiring school-based providers to have to report data regarding zoning, occupancy, lead flushing, playground equipment, etc. that is already provided by the school to the board.

- **How can the government more effectively harmonize standards across legislation as well as regulatory requirements in child care (e.g. number/ages of children in licensed vs. unlicensed home care, clarification of programs that do and do not require licences)?**

As noted previously, synchronize the *Day Nurseries Act* and the *Education Act* to level the playing field for childcare providers and schools including adopting the recommendations in YMCA's presentation, *For Ontario's Children: Building An Integrated and Efficient Early*

Learning & Child Care System. In addition, physical space licensing requirements are too exacting; these need review.

- **As the government looks to deliver on the commitment to provide on-site after-school programs for six-to-12-year-olds, should we consider a new licensing category for older children that builds on the strengths of a recreation program model (e.g. different program requirements for older children, participation in recreation-focused programs)?**

Yes, after school group care for six-to-12-year-olds should be on the recreation program model including safety of equipment, staff requirements, play space requirements, and should reflect the Board of Education regulations for the same category of programs.

Staffing requirements should be amended to allow for graduates with other recreation qualifications to be hired.

5) Support for Accountability and Capacity-Building

Objective: As the government modernizes child care over the next three years, we will improve data collection, enhance licensing procedures and develop supports for parents and operators to help us better evaluate outcomes, support sector capacity, reduce duplication and improve accountability.

- **How can risk assessments help the government use licensing resources more effectively, encourage compliance and reward high-performing child care operators?**

Child care is not an area where a competitive “reward” system is appropriate. Resources should be placed where they are needed to nurture and support children. We recommend the government adopt an aspirational approach for the sector such as the voluntary and peer-driven Raising the Bar (RTB) quality initiative. Wellington County’s quality initiative, Operating Criteria, is also worth reviewing.

- **How can the government encourage quality and licensing compliance (e.g. administrative orders, administrative monetary penalties)?**

Compliance requires training to the new standard, so implementation of a revised *Day Nurseries Act* or substitute legislation will require accompanying training funding. Implementation should come in pieces that are manageable and not an overwhelming amount at once. Support child care centres to adopt policies consistent with the new legislation and develop a website with sample policies and online training.

- **What tools can support program and administrative leadership in child care (e.g. for centre directors and staff, volunteer boards)?**

See above - sample policies and forms on the website; a training webinar; local workshops.