

January 31, 2017

Early Years Division
Ministry of Education
900 Bay Street, 24th Floor, Mowat Block
Toronto ON
M7A 1L2

Dear Ministry of Education,

We are writing in response to your request for feedback on Building a Better Future: A Discussion Paper for Transforming Early Years and Child Care in Ontario.

The Region of Peel is pleased to offer a response and recommendations on the four pillars outlined in the discussion paper that is intended to guide the province's renewed child care and early years framework and its child care expansion strategy. The enclosed report incorporates feedback from the Region of Peel's Human Services and Peel Public Health Departments.

We commend the province for continuing to advance its vision to address issues which affect the early years system and for engaging service system managers, providers, families and other system partners in the feedback process.

We look forward to the province's review of the feedback received through this process and our continued partnership in achieving our shared vision that all children and families have access to accessible, responsive, affordable and high quality early years and child care programs.

Sincerely,



Suzanne Finn
Director, Early Years and Child Care Services
Human Services Department
suzanne.finn@peelregion.ca



Anne Fenwick
Director, Family Health
Peel Public Health
Health Services Department
anne.fenwick@peelregion.ca

Attached:

Building a Better Future: A Discussion Paper for Transforming Early Years and Child Care in Ontario,
Region of Peel Submission to the Ministry of Education

Building a Better Future: A Discussion Paper for Transforming Early Years and Child Care in Ontario
Region of Peel, Submission to the Ministry of Education
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PILLAR #1

Access to Licensed Child Care and Early Years Programs

Access to licensed child care and early years programs means that all families are well supported and able to work or study, and actively participate in licensed child care programs and/or family resource programs as required. In order to achieve this, Regional staff recommends that the province take action to:

- Ensure that all families have access to child care of their choice and includes evening, weekend, and ad hoc (emergency or drop in care);
- Facilitate access for families who are in vulnerable circumstances (i.e. living with poverty, recently immigrated, precarious employment, or have a physical or mental illness) as they need equal access to high quality early years and child care so their children receive the best chance for positive and healthy growth, development and learning opportunities.
 - Increase supply of spaces to support families who work in precarious employment through increased provincial funding and specific requirements for the Service System Manager to assess need in their jurisdiction.

In order to achieve meaningful access for all families, support and action are required by all levels of government, communities, employers and providers to effect change, and include:

- a. Federal Government
 - Provide the necessary capital and operating funding to support the implementation of the National Child Care Strategy; and
 - Enable Service System Managers to have limited on-line access to Canada Revenue documentation to accelerate the fee subsidy assessment process.
- b. Provincial Government
 - Increase capital and operating funding to support system expansion with an emphasis on creating infant and toddler spaces, offering extended hours of care and prioritizing school based settings;
 - Consider expansion beyond a schools-first approach by accessing government owned buildings by all three levels of government (e.g. community centres, libraries, etc.) for child care and early years programs and services;
 - Address demand in areas with low school-based child care options;
 - Reach out to leaders in school boards to create a common vision that schools belong to the community and mandate boards to review policies that present barriers to school-based child care. This shift in mindset is critical as all partners work together to support children in Ontario;
 - Offer incentives to businesses to support the expansion of workplace child care;

- Share demographic data at the dissemination area level with system partners to support system planning;
 - Evaluate alignment with underserved areas when assessing/reviewing new licensing applications;
 - Develop an early years and licensed child care public awareness campaign that:
 - targets key audiences e.g. new immigrants, individuals with precarious employment, etc.; and
 - encourages unlicensed providers to join licensed home child care agencies.
- c. Local Governments
- Establish fee subsidy policies which increase access to services for families and balance the need for accountability of public funds;
 - Examine zoning and by-laws guidelines to support new development of child care locations in underserved areas;
 - Leverage publicly owned buildings i.e.: libraries, municipally and regionally owned infrastructure, and establish low lease cost to support affordable early years and child care; and
 - Purposefully plan to provide child care programs in all new schools.
- d. Others
- Employers should assess employee demand for workplace child care and/or engage licensed child care providers to offer flexible hours; and
 - Providers could look for opportunities to expand licensed home child care programs in rural/under-served areas.

Region of Peel staff commend the province on their intention to strengthen and expand the early years and child care system. Wait lists for infant and toddler spaces are a reality in many communities as demand exceeds supply. In Peel Region, the licensed child care system currently serves approximately ten per cent of infants and fifty-seven per cent of toddlers requiring licensed child care based on the 2011 census data. In addition, children and families are frequently turned away from family resource programs due to program over-enrollment and space occupancy restrictions. The province's expansion strategy will enable more families to access high-quality early years programs and enable parents to study or work and feel confident that their children are safe and happy.

PILLAR #2

Responsiveness to Needs of Families and Children through Early Years Programs and Child Care in Schools, Communities, Workplaces and at Home

The Region of Peel recognizes that many changes have occurred in the early years sector over the past few years which reflect positive steps toward strengthening the existing system and responding to the needs of children and families. Despite many positive changes, many families continue to have limited or no options for affordable child care and are likely making child care choices that may not be in the best interest of their child(ren).

In order to provide families with more choice and flexibility, Regional staff recommends that the province:

- Provide additional provincial funding to expand and support the higher operational costs of part time, evening and weekend care;
- Review school board cost recovery policies with a goal of reducing/fully subsidizing lease/permits costs for designated and shared space in schools.
 - This recognizes that even a cost recovery lease approach by school boards will result in an increase in child care fees or, a reduction of service in early years programs. If the province opted to subsidize the lease cost for child care programs located in schools, the province can require that the savings in fees be noted on child care providers fee schedules as a direct provincial subsidy similar to the approach used for the Wage Enhancement Grant;
- Incentivize businesses to provide workplace child care for employees at a reduced cost; and
- Increase funding for family support programs to support expansion of programs.

PILLAR #3

Affordability for Families that Need Support

Accessing affordable child care continues to be a huge concern for many families. With the increasing cost of child care, high-quality licensed programs are beyond the means of many parents seeking care for young children. While subsidies are available for low income families there are many families across Ontario who are on waitlists or are not eligible to receive a fee subsidy. The Region of Peel has been fortunate to maintain a zero waitlist for fee subsidy over the past three years. There are approximately 9,500 children currently receiving a fee subsidy in Peel Region, but as demand continues to grow, it is likely that a waitlist may be required in 2017.

Regional staff recommends the following actions for governments, communities, providers and employers in order to make early years programs in Ontario more affordable:

- a) Federal Government:
 - Establish maximum child care rates as part of a National Child Care Strategy to ensure affordability for all families, including those that are middle income earners; and
 - Allow families to claim the full amount of child care as a tax deduction.

- b) Provincial Government:
 - Update the fee subsidy model to so that families earning less than \$40,000 annually (currently \$20,000) would qualify for a full fee subsidy, with increasing incremental income levels for partial subsidy that would allow middle income earners to qualify. Tie the income test to cost of living increases to ensure the increase costs of basic needs are always factored into the formula;
 - Increase funding for fee subsidy to Service System Managers to support increased demand and address wait lists pressures;
 - Explore and implement measures that would help offset the cost of child care for all families, including middle income earners who may not qualify for fee subsidy;

- Explore a bulk purchasing approach to support child care providers and other programs to reduce the costs of common child care expenses (e.g. cribs, cots, toys and play material, play grounds, etc).
- c) Other:
- Local governments and communities should explore the use of existing community space, where lease costs are minimal, for child care and early years programs;
 - Service System Managers should explore how their General Operating Policy supports the priority of affordable licensed child care in their communities;
 - Employers should offer workplace child care at a reduced cost for employees and their local community.

PILLAR #4

Quality programs that contribute to healthy child development measured through established province-wide outcomes

All levels of government and child care and early years providers have a responsibility to support high-quality programs and services, however, the responsibility to ensure high quality programs should rest with the province.

Recommendations regarding the provincial role in ensuring high quality early learning and child care programs include:

- Developing a province-wide tool to evaluate if HDLH is effectively being implemented in a program. This would support a consistent standard of quality programming across the province;
- Providing clarity to Service System Managers regarding their role in supporting HDLH with child care providers.
- Requiring Service System Managers to develop an accountability framework for programs receiving provincial funding regarding continuous quality enhancements.
 - In Peel, an accountability framework has been put in place for operators/licensees to receive funding. This framework requires programs to accept children in receipt of fee subsidy, demonstrate inclusionary practices by participating in Peel Inclusion Resource Services and participate in a continuous quality enhancement initiative.
 - In addition, the Region of Peel also works with Child Development Resource Connection Peel to provide professional education opportunities to the early years and child care community;
- Developing additional resources for parents that would support them in choosing quality child care. Resources could include a guide outlining questions to ask a provider and what to look for when they visit an early years or licensed child care program;
- Developing a wage grid for Registered Early Childhood Educators (RECEs) and supporting the implementation of the grid with operating funding is critical to stabilize the workforce in early years and licensed care. Wage Enhancement has encouraged some RECEs to remain in the licensed child care sector. However, many are still receiving very low wages (Peel's

- RECE average is \$18.38/hour) which negatively impacts the quality of programs due to challenges with retaining quality staff and maintaining consistency of caregivers for children. Over the last five to six years, there has been significant turnover of staff in licensed programs in Peel, particularly at the supervisor/director level;
- Providing the Wage Enhancement Grant to RECEs working in family support programs starting in 2018. If the Wage Enhancement Grant is not extended to family support programs there will be three tiers of RECE wages in the early years and child care system which will lead to staff retention challenges impacting the delivery of high quality programs;
 - Aligning Early Childhood Education program standards to meet employers' need for highly skilled and qualified graduates;
 - Ensuring ongoing community professional education opportunities are made available to early years and child care educators working within the sector; and
 - Developing standards and policies for child care in Ontario in the following health-related areas:
 - a) **Healthy Eating:** Release a policy statement by the Minister of Education requiring implementation of [Nutrition Recommendations for Licensed Child Care Providers in Ontario](#) to ensure supportive nutrition environments in licensed programs. (This would be similar to the [Minister's Policy Statement on Programming and Pedagogy](#))
 - b) **Physical Activity and Sedentary Behaviour:** Require the implementation of physical activity and sedentary behaviour guidelines from the Canadian Society for Exercise Physiology. Canadian 24-hour Movement Guidelines for Children and Youth (for age 5-17) were recently released. These guidelines address physical activity, sedentary behaviour and sleep. Similar revisions to current [physical activity](#) and [sedentary behaviour](#) guidelines (including screen time), for children aged 0-4 years old are expected in 2017.
 - c) **Physical Literacy:** Develop a province-wide physical literacy program for the early years.
 - d) **Oral Health:** Require providers to implement policies to support oral and dental health
 - Ensuring the early childhood education curriculum is enhanced to include all aspects of child health and development including healthy eating, physical literacy, physical activity and the harms associated with sedentary behaviours.

Summary

Working towards a goal of building an early years system that provides accessible, affordable, responsive and high quality care for young children and families is a significant commitment. We commend the province for acknowledging the growing need for changes to the system and appreciate the opportunity to provide feedback based on the experiences in Peel Region.