Modernizing Child Care in Ontario
Response from Child Development Institute

September 2012

Dear Minister Broten,

We sincerely appreciate the leadership you and your government are providing in the early childhood field and the specific actions to introduce full day kindergarten, provide additional funding and commit to a process of reviewing and re-developing the policy and legislative base for child care services in Ontario. We know this latter work is challenging but that it is important to set the new foundations in the right way. We also appreciate the opportunity you have provided for participation and input into this important process. As proud member of the Quality Early Learning Network, we fully support the recommended strategies and actions in the Solutions Paper and in the response from QELN to Modernization. We are also pleased to provide a select response from our organization to some of the aspects you have outlined.

We look forward working with you and your staff and other partners in moving this important work ahead. We welcome any other opportunities to provide input.

Yours sincerely,

[Signature]

Tony Diniz
Chief Executive Officer
Modernizing Child Care in Ontario

Our Lens
Our connection to child care is profound as the beginnings of one of our legacy agencies – The West End Crèche – was one of the pioneering child care centres in Toronto when it was established in 1909. Today, Child Development Institute as a multi-service multi-site provider operates 5 large neighbourhood-based child care centres in downtown Toronto in addition to the operation of the Parkdale High Park Ontario Early Years program. Several of our child care programs operate in ‘high needs communities’ (St. James Town, Parkdale and Regent Park) and we have chosen to be in these neighbourhoods provided that there continues to be a fundamental viability of service delivery. There are a number of challenges operating in these neighbourhoods, the most prominent is the dependence on subsidy administration; however, we welcome the substantial opportunities in child development and support for families. Over the last several years, we operated but then closed with regret three school based Best Start sites as they were not sustainable. Now, with the implementation of full day kindergarten, all of our early learning programs have experienced large changes in enrollment of preschool children which threatens the fundamental viability of these programs and the important services they offer to younger children and their families. While program delivery is now clearly challenging, the community need has not and we have substantial wait lists for service. CDI also delivers a full range of children’s mental health programs which include,

- a Daycare Consultation and Support Team which provides support to more than 40 child care centres in downtown Toronto regarding the care of children with special needs,
- School based children’s mental health programs which include our Start Right program to support about 30 schools of TDSB and TCDSB for children in kindergarten and Grade One with adjustment problems,
- Our award winning SNAP® program which is a leading evidence based children’s mental health program licensed and replicated in almost 100 sites across Canada and around the world.

Our Family Violence programs bring us into daily work with women’s shelters and with child welfare. All of our services embrace a number of values including quality at the level of excellence, linked and partnered with other services as needed and possible, integrated research and program development through outcome evaluation.

General Comments and Issues
Need to establish child care framework – we welcome the move that your government has made in positioning child care within the Ministry of Education. This underscores that while child care has a clear and important ‘care’ function, we are also recognizing and building on new brain neuroscience, that the early years are fundamental building blocks for learning and human development. While we celebrate this positioning and support a vision of a single seamless service stream, we do have other concerns that some of the unique differences need to be appreciated against the dominant culture of school based education. This will especially be important in school services where child care centres will have to differentiate their accountability and complexity of relationships to their boards of directors, their school board partners, their links to the municipalities, to the Ministry of Education and the College of Early Child Care Educators – and somehow to their parents in this maze of relationships. Specifically, we recommend the following:

1. That the Minister establish a Minister’s Child Care Advisory that will relate directly to her over the next three year period as she undertakes the important work of re-building the child care foundation.
2. That the Minister commission her staff to create an Accountability Framework for Child Care document which sets out to clarify the complexity of accountabilities and relationships in the development and delivery of child care.

**Neighbourhood based and not schools first** – While we appreciate some of the thinking behind the proposed ‘schools first’ planning principle, we do have some misgivings about this. We have had some excellent relationships with schools and we have had others where there were ongoing struggles. Some schools continue to see child care not as integral to their ‘learning agenda’ but as tenants and lower tier priority to other school pressures. While we appreciate the school-as-hub intention, the world of early learning and care is wider and more complex and must include licensed home child care and workplace settings. We have a wider vision of neighbourhood integration and our intent at CDI has been to integrate our services not only with schools but also with library, community recreation and other community services and be at the core of neighbourhoods. However, if the Ministry wants to actualize a ‘schools first’ principle, we recommend the following:

3. That the Minister direct Boards of Education to establish strong security of tenancy provisions for their child care partners operating in schools.
4. That the Minister directs Boards of Education not to charge market rent levels for child cares in schools, essentially to subsidize what has already been paid for through public funding.

**Stabilization** – we agree with the stated intent that the immediate and mid-term strategy should be system stabilization and transformation. We recognize that not every child care centre will survive the coming conditions but we remain highly committed to maintaining system capacity, wherever possible. We know from first-hand experience the cost and difficulty of opening new child care programs and that loss of system capacity is very hard and expensive to develop downstream. Stabilization should be the immediate priority but after approximately three years, there is such a discrepancy between community need and available child care services that we should re-focus on system expansion and develop strategies to increase service capacity in needed communities. The chasm between two numbers – that 70% of women in Ontario are working while licensed regulated child care is only serving 20% of Ontario’s kids – is striking and means that 50% or half of Ontario’s working families are struggling with unregulated private arrangements for their young children, at a time when their development is crucial to lifelong health and human development. We can and must do better.

5. That the Ministry direct municipal system managers to prioritize close work with child care centres at risk of closure and that they utilize any available mechanisms to prevent the loss of child care spaces.
6. That during this transition time, that the Ministry track closures of child care centres attributable to the transformation and provide analysis and action planning to mitigate loss of capacity.
7. That the Ministry maintain in their long range planning, a commitment to increase child care spaces and system capacity after stabilization and transformation have been completed.

**Funding**
In our Toronto environment, child care funding is astonishingly complex, irrational and problematic. Consider some of the following paradoxical examples:

- Some of our child care programs receive Wage Enhancement and others don’t which makes it very difficult for multi-site providers to pay staff on a uniform basis. We have had to ‘infill’ these discrepancies at our own costs to provide a stable and uniform wage enhancement to our teachers across multiple sites. We understand that with shifting enrollments to centres due to
FDK, that WEG levels could drop which might be the ‘killing blow’ for centres struggling to adapt to the new realities.

- We often have long wait lists for service but because of subsidy shortfalls, we sometimes have vacancies – and because we budget at such a high level of efficiency and utilization, vacancies provide havoc on the bottom line.
- Costs for licensed care in Toronto is now so high across the entire sector that the service is being vacated by fee paying parents who have maxed out their family budgets. Licensed care is increasingly being used by only families with high incomes or family with low incomes – middle income families are forced to look for other arrangements for their children. The challenge to create financially accessible service for families while also paying early childhood teachers appropriately salaries must be addressed.

Our organization has substantial capacity in financial management, program management and marketing and even with these organizational competencies, it is difficult to keep afloat. We need a dramatically different funding arrangement which flows available public funding to child care in ways that are more predictable and simpler. At the same time, we also need strategies to better address the financial accessibility of this service without lowering quality or the salaries for teaching and professional staff.

8. We urge that the Minister consolidate the many child care funding streams into a base funding model that has been outlined in QELN’s Solutions paper.

9. That the Ministry assure providers of their current WEG levels which might be threatened with shifting enrollments due to Full Day Kindergarten.

Service Planning
The fragmentation of early year’s services for families has been well documented in other reports. Even in the child care sector alone, services exist on a ‘market’ basis and care providers co-exist and compete with one another. For parents trying to access service, this means navigating a maze of services which for the most part operate in isolation from each other. Now the additional enrollment pressures from Full Day Kindergarten are further pushing the fault lines of this reality so that in most neighbourhoods there are likely several child care centres operating with struggling enrollment and all tottering on surviving. The time is now for a different approach, for a stronger systems management role which convenes providers serving the same neighbourhood to best organize their services together to meet need within a realistic sustainability framework. This could lead to specialization and better service, to planned closures where this is the reality and in some circumstances to mergers and consolidations to achieve better and stronger systems performance. This is happening in other services (e.g. healthcare) and we need this now in many communities in child care.

10. We recommend that the Minister urge or require municipal service managers to take a stronger role in child care service planning in order to shape services to best meet community need in the context of available resources.

Program Quality Assurance
Quality matters enormously in the field of early learning – children’s early development and their trajectories can flourish when they have the right environments and supports and opportunities; by the same token negative experiences may well have adverse outcomes for many children. We support a strong provincial licensing system that assures the same high quality standards for all of Ontario’s young children. We support that licensing be based on regulations and requirements that are evidence based on the developmental needs of children which includes the professional training and qualifications of those in care positions. With the growing overlap between school based environments for child care and school learning programs, it is indeed time to align the licensing requirements for these spaces.
11. We recommend that the Minister convene a panel of ‘experts’ to closely examine the specific licensing regulations and requirements in the Day Nurseries Act in the context of current research and best practice and make recommendations toward the new expected legislation.

12. We recommend that this panel also address the alignment of space requirements for child care and school usage as much as possible. We support that the outcomes of licensing continue to be made publicly available to parents to assist them in selecting child care and that the Ministry of Education strongly markets the availability of this information to parents.

While we stand clearly in favour of licensing and standards, we also believe that the time has come for one consistent set of standards and one quality assurance process to be used in child care. While there may have been some merit in the past in some municipalities requiring different and additional standards and their own quality assurance, this is now duplication, confusion and costly not only for the province and the municipalities but also for care organizations and providers who have to manage this assurance twice. We care not who actually conducts licensing (Province or municipality) but we do think it needs to be settled on one system.

13. We recommend that the Minister establish one set of strong licensing standards and one licensing process.

Special Needs Resourcing
With our particular interest in risk factors for young children, we have been active advocates for and a service provider in strengthening the fabric of child care to support the care of young children with varying and diverse needs. In our centres we routinely go to extraordinary measures to accommodate all children with varying needs and abilities and believe that all early learning in Ontario should be expected and supported to achieve this. While this consultation has not asked for input in this area, we are heartened by the paragraph in the Discussion Document which addresses this issue. We strongly support the Minister’s stated intent to review and update ‘elements’ of the special needs resourcing program.

14. We recommend that the Minister embed in the coming legislation that same commitment to meet special needs in child care.