September 24, 2012

Hon. Laurel Broten
Minister of Education
Government of Ontario

Dear Minister

As education critic for Ontario New Democrats, I am pleased to submit to you the following comments in response to your Ministry’s discussion paper entitled “Modernizing Child Care in Ontario.”

Action is badly needed to address the current child care crisis in this province. As numerous advocates and experts have indicated, Ontario lacks a comprehensive early learning and care system.

Currently in Ontario, we only have licensed child care spaces for one out of every five children. Licensed child care, where available, has become unaffordable for many parents with fees reaching as high as $2,000 a month. Modest-income parents who qualify for a subsidy are forced to wait months or even years before securing financial help. Furthermore, communities across Ontario are seeing some of the best child care centres shut their doors – victims of chronic underfunding and impacts of the implementation of full-day kindergarten.

With the lack of licensed child care, and the majority of parents in the paid workforce, more parents are forced to rely on unregulated child care where there is no assurance of quality. And worse, large for-profit companies are expanding in Ontario further compromising the quality of care. Finally, working conditions for many workers in the child care sector are unacceptably
poor, with wages that are simply too low to reasonably live on. As a result, trained child care workers are exiting the sector leaving behind them a shortage of trained staff.

Ontario’s New Democrats are committed to taking action to ensure that Ontario families have access to public, non-profit, affordable, high quality child care. We made significant commitments in the last election campaign of freezing child care fees, and investing to help centres survive the transition to full day kindergarten. In addition, as you know, we made child care a top priority in negotiations around the 2012 budget, and worked with your government to secure significant additional funding to help stabilize and support child care centres.

Much more needs to be done. Likewise, based on discussions with parents, teachers and experts in the field of early childhood education and care, we are submitting to you some suggested directions for action to build an accessible and sustainable child care system in Ontario.

First, it is important to establish some overarching goals which should guide our actions:

1) **Accessible child care for all:** There must be a clear commitment from this government that affordable, accessible and flexible child care and early learning opportunities will be available for children from all families who need or want it. We know this can’t be done overnight but it must the goal towards which we aim.

2) **High quality care:** Parents need to know that when they drop their children off for the day they can rest assured not only that their children are safe, but they are thriving in a nurturing, stimulating and educational environment.

3) **Public and not-for-profit delivery:** Research indicates that both the quality of care and working conditions for staff are compromised in for-profit child care settings. The Ministry of Education must ensure that public funds go towards high quality public and non-profit programs for Ontario’s children.

4) **Adequate and sustainable funding:** Government has a responsibility to ensure adequate funding for the delivery of quality care, and to ensure funding is sustainable.

5) **Comprehensive policy framework:** Child care and early learning programs should be integrated into a comprehensive early learning framework that includes other family support and community services.

To achieve these five goals, I would encourage the government to take the following actions:

**Operating Funding Formula**

1) **Make child care affordable:** Currently parents who don’t qualify for subsidy are expected to pay the full cost of child care. This model is neither secure (as child care centres are vulnerable to children leaving and parents’ access to child care subsidy) nor affordable for parents (who are already struggling to afford current fees).
Ontario must develop a plan to move towards a more sustainable funding model, as in Quebec and Manitoba, where government provides a percentage of base funding to all public and non-profit child care centres. Parents simply cannot continue to be expected to cover the full operating costs of child care centres. Such a shift will make fees affordable for families and make child care centres operators less vulnerable to closure.

2) **Recognize diverse needs:** The new funding formula needs to be responsive to the specific needs of rural, remote, northern and francophone communities. It also needs to respond to the extra costs of special needs children.

3) **Coordination of subsidy applications and waiting lists:** Money could be saved by having subsidies administered centrally.

**Capital Funding**

4) **Security of tenure in schools:** To ensure the best use of capital investments to upgrade child care spaces, child care operators must have a much more certainty of tenure in schools, which means moving away from a landlord-tenant relationship, and towards a partnership model.

**Quality Programs**

5) **Stop the spread of for-profit child care:** For-profit child care companies are chomping at the bit to profit off Ontario parents and children. The government must make it clear that for-profit care is not a viable solution for addressing the shortage of licensed care. Public dollars should not being going to pad the profits of such providers. Following the lead of some municipalities, the government should put a moratorium on the any new spending of public dollars (e.g. subsidies for children) on for-profit centres.

6) **Curriculum and Quality:** The government should set province wide standards for curriculum and quality assurance building on existing initiatives rather than starting again from scratch. For example, the Toronto Operating Criteria offers a promising mode for quality assurance, and significant work has been done developing the Early Learning for Every Child Today (ELECT) curriculum.

**Modernized legislative and regulatory framework**

7) **Update the Day Nursery Act:** The requirements of the Day Nursery Act should be reviewed, but this should not be seen as an endeavour to lower standards or to cut costs. We urge caution over the expansion of informal care recognizing that regulation and licensing of current informal care is not a substitute for properly inspected, licensed child care centres.

8) **Local Planning:** Municipalities should be given the power to approve or deny new child care spaces to ensure a more rational geographic planning of such centres.
Support for accountability and capacity-building

9) **Comprehensive strategy:** Ontario needs a comprehensive early learning and child care strategy with targets and timelines for delivery of child care spaces.

10) **Explore ways to reduce duplication and complexity for parents:** For example, it would be parent-friendly to move towards consolidated waiting lists.

I hope you will consider the above suggestions, many of which are echoed by parents, workers, and child care experts and advocates.

Let me conclude by raising two interim issues.

First, the slow pace of the roll-out of the $242 million in stabilization funding is of great concern to me. I am upset to hear that even though the funding framework was on the Minister’s desk in June, it still has not been approved. I am further disconcerted to hear that money unspent from the initial allocation of funding could be clawed back if not spent by municipalities by December 31, 2012. Municipalities – and parents – need your assurance that every dollar will be spent as intended on child care and not clawed back.

Second, it has come to my attention that existing in-school child care centres that can’t provide before and after school care for older children are being told they have to leave. I urge you to intervene to ensure that if the child care centre will not provide before and after school care then the school will run it, so that younger children are not forced out of their child care spaces.

Thank you for your work to improve child care and early learning in Ontario.

I look forward to working with you to address the challenges faced by today’s parents.

Sincerely,

Peter Tabuns, MPP
Toronto-Danforth