



TO:	CHAIR AND MEMBERS COMMUNITY SERVICES COMMITTEE MEETING ON SEPTEMBER 10, 2012
FROM:	LYNNE LIVINGSTONE MANAGING DIRECTOR NEIGHBOURHOOD, CHILDREN AND FIRE SERVICES
SUBJECT:	PROVINCIAL MODERNIZING CHILD CARE POLICY DIRECTION AND FUNDING ANNOUNCEMENTS

RECOMMENDATION

That, on the recommendation of the Managing Director, Neighbourhood Children and Fire Services, the following report **BE RECEIVED** for information purposes.

PREVIOUS REPORTS PERTINENT TO THIS MATTER

- Access to Child Care Fee Subsidy Wait List Policy Change and Business Practice Changes – November 1, 2011
- Barriers and Challenges in Accessing Child Care in London – June 14, 2011
- Overview of Child Care in London and the City of London's Role as a Consolidated Municipal Service Manager (CMSM) – February 15, 2011
- Provincial Announcement on Early Learning and Child Care – May 10, 2010
- Provincial Announcement Regarding Full-Day Learning for Four and Five Year Olds in Ontario – November 16, 2009
- Full Day Learning for Four and Five Year Olds Pilot Projects in London– October 19, 2009
- Update on Provincial Child Care Funding Allocations – September 28, 2009
- Dr. Charles Pascal Report: With Our Best Future in Mind, Implementing Early Learning in Ontario – July 20, 2009
- Reinstating London's Child Care Fee Subsidy Wait List – February 25, 2008
- Options for Short Term Measures to Address the Child Care Fee Subsidy Wait List – October 29, 2007
- Child Care Fee Subsidy Wait List – October 15, 2007
- Child Care Fee Subsidy Wait List Policy and Wait List Implementation – July 9, 2007

BACKGROUND

PURPOSE OF THIS REPORT

The purpose of this report is to provide:

1. Information on the recently announced Provincial discussion paper relating to the Modernization of Child Care in Ontario;
2. The Consolidated Municipal Service Manager's plan to respond to this discussion paper; and,
3. Information on recently announced Provincial funding for child care.



Modernizing Child Care in Ontario Policy Discussion Paper

On June 27, 2012 the Ministry of Education formally released a discussion paper entitled *Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together*. The discussion paper's stated aim is to "introduce a conversation about the long-term vision for child care in Ontario, as well as targeted medium term objectives for the next three years." The discussion paper seeks to begin a conversation with municipalities, the child care sector and families to help guide the modernization of the child care sector so that it works more effectively with Full-Day Kindergarten and creates a more integrated early learning and child care system.

The discussion paper indicates that over the next three years the process of modernization will not be about expansion of services. Rather, the focus will be on stabilizing and transforming the current system to enable higher-quality, more consistent services that are more closely integrated with the education system.

The discussion paper is seeking feedback by September 24, 2012 on five "key areas for action" over the next three years:

- Operating funding formula
- Capital funding priorities
- Quality programs
- Modernized legislative and regulatory framework
- Support for accountability and capacity building

Within each of these five areas the discussion paper includes key questions to help guide the conversation. These questions can be seen to be telegraphing future Provincial policy direction with respect to child care issues. Some of the key issues are:

- Acknowledgement that the existing funding formula is out-dated, and that there are inconsistencies amongst municipalities in the amount of funds allocated to each. The discussion paper and the related funding policy announcement discussed below indicate that a new funding formula is being considered that will rebalance how child care funding is distributed across the Province;
- An indication that future capital spending on child care will have to be coordinated with local School Boards;
- Acknowledgement that the existing Day Nurseries Act no longer fully meets the licensing, compliance and quality requirements of the licensed child care sector. The discussion paper also seeks input on areas where new licensing approaches could support specific situations such as the informal child care sector and remote, northern and rural communities;
- A desire to enhance program quality and consistency by developing mandatory program guidelines for child care operators. Current guidelines focus almost exclusively on facility design and operational factors but do not provide substantive direction on program quality elements.

The Consolidated Municipal Service Manager's (CMSM) response to the discussion paper

As the CMSM for London-Middlesex, Neighbourhood, Children and Fire Services worked with the County of Middlesex to develop a response to each of the areas identified in the discussion paper. Child care and recreation service providers with whom London and Middlesex have a Purchase of Service Agreement participated in a day long discussion around the key questions asked in the discussion guide. A draft paper was then shared with the child care community for their feedback.



The document attached as Schedule A (*Modernizing Child Care in Ontario – London-Middlesex’s Consolidated Municipal Service Manager’s Perspective*) is the final version of the CMSM’s response to the Ministry of Education. Some of the key points included in this response are:

- The need for a greatly simplified funding allocation that balances the need to support the child care system as a whole while at the same time also directly supporting children and families with higher needs;
- The need for clarification around the CMSM’s role and responsibilities with respect to how the child care and early learning system is funded;
- The need for an equitable funding allocation for municipalities that provides CMSMs with the flexibility to respond to local circumstances while also establishing the Ministry of Education’s system expectations and desired outcomes;
- Continued support for a “schools-first” policy that more closely integrates child care and elementary schools;
- Development of a Provincial framework to assess quality in child care programs that can be applied locally using a peer-accreditation approach;
- Development of a Provincial *Special Needs Resourcing Community of Practice* to identify and share best practices in this area amongst CMSMs and DSSABs;
- A streamlined and modernized licensing and regulatory framework under the Education Act that preserves the best aspects of the Day Nurseries Act for younger children while supporting the development of more flexible regulatory options for older children and those living in smaller and remote communities.

Provincial child care funding announcements

Following the release of the Modernizing Child Care discussion paper, the Ministry of Education provided details of additional funding to CMSMs for child care across the Province. The funding is structured to support the child care sector over the next three years until the results of the modernization have been implemented.

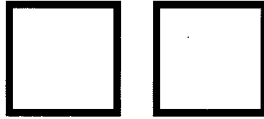
The total amount of Provincial funding announced for the 2012-2013 fiscal year is \$90 million and is split as follows:

- Approximately one-third is allocated to specific funding pools intended to directly support child care centres. Seventy percent of this allocation is available in the 2012 calendar year; the remaining 30% will be available in the 2013 calendar year;
- \$50 million has been reserved by the Province as “Bridge Funding” to help mitigate the impact on municipalities whose funding is reduced as result of the implementation of a new funding formula;
- The balance of funding is allocated to support First Nations child care, Transition Capital Funding, and child care retrofit investment in schools.

London-Middlesex’s portion of the 2012 calendar year funding outlined in the first point above is \$674,882. As the CMSM, we are working to distribute these funds to the child care sector in London and Middlesex within the time frames and according to the specific guidelines that have been provided.

Schools first policy and related policy/funding announcement

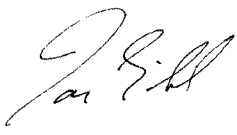

The Ministry of Education has repeatedly articulated a policy direction to strengthen the availability of child care within school settings. In a separate but related policy/funding announcement, the Ministry provided direction to local school boards to work with municipalities to co-develop plans to convert existing school based child care spaces for 4 and 5 year olds as well as space not required for institutional purposes to spaces that can be licensed for children 0 to 3.8 years old. These investments will also create opportunities for community-based child care centres to relocate to schools.



The details of this policy are still being released. Indications are that school boards will be given the capital to retrofit the physical space occupied by child care programs in their schools. It is understood that school boards will be required to submit a plan, developed and signed in partnership with the CMSM, to the Ministry of Education outlining how the available funds will be spent. Neighbourhood, Children and Fire Services is already working closely with all school boards in the municipality to develop these plans.

FINANCIAL IMPACT

London-Middlesex received \$674,882 in one-time funding for the balance of the 2012 calendar year. This funding is 100% Provincial and there is no Municipal contribution required. Despite the existence of a wait-list for child care fee subsidy in London, Neighbourhood, Children and Fire Services intends to distribute these funds to the child care sector in ways that do not create on-going operating or financial pressures for which there is no permanent funding source.

SUBMITTED BY:	RECOMMENDED BY:
	
IAN GIBB MANAGER, CHILDREN'S SERVICES NEIGHBOURHOOD, CHILDREN AND FIRE SERVICES	LYNNE LIVINGSTONE MANAGING DIRECTOR NEIGHBOURHOOD, CHILDREN AND FIRE SERVICES



SCHEDULE A

Modernizing Child Care in Ontario

London-Middlesex Consolidated Municipal Service Manager's Perspective



London
CANADA

August 2012

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MODERNIZING CHILD CARE IN ONTARIO LONDON-MIDDLESEX'S COMMUNITY PERSPECTIVE

INTRODUCTION

Child care and early childhood education in Ontario has evolved over the past 30 years without the benefit of a unifying vision or cohesive Provincial policy. Funding, although substantial, is not integrated with the Province's strategic priorities, is hard to understand, cumbersome to manage, and is not distributed equitably throughout the Province.

Similarly, Ontario's efforts to improve the quality, consistency and accountability components of the child care system have fallen far behind the progress made in other jurisdictions. There are few Provincially mandated requirements related to quality, and those that are in place focus on simple compliance to minimum standards established by an out-dated legislative and regulatory framework. There are few indicators that measure, at least from a public policy perspective, the value of Ontario's strategic investment in the early years.

Despite this, Ontario's child care and early learning system continues to serve hundreds of thousands of parents and children every day.

Modernizing Child Care in Ontario begins a long-overdue review of child care funding, quality assessment and accountability policy. Parents, service providers and municipalities throughout the Province are engaged in discussions on how to bring the child care system up to date and how to build a solid foundation for a truly cohesive and integrated early learning system for the children and families of Ontario.

The London-Middlesex Consolidated Municipal Service Manager (CMSM) is encouraged by the possibilities described in the modernizing document. Nearly 50 child care professionals representing over 75% of our licensed child care programs came together in August 2012 to discuss *Modernizing Child Care in Ontario* and to help inform this response. We are pleased to be able to provide the Ministry of Education with our CMSM's high level perspective on the five areas outlined in the *Modernizing Child Care in Ontario* discussion guide.

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THE LONDON MIDDLESEX CONTEXT

Every municipality and region in the province has its own unique set of circumstances and experiences that have shaped the child care system within its boundaries. London-Middlesex has identified certain key elements that we believe are important in understanding our “modernization” philosophy.

The child must always be at the centre of the system - Every discussion about the evolution of the child care system in Ontario must always remember that the child is at the heart of our system. Every suggestion, every decision and every action must always be based on what is best for the child.

A cohesive, integrated early learning system - Our community strongly endorses the need for a comprehensive, cohesive and integrated system approach to supporting children, youth and families. The licensed child care system must be viewed in the context of our broad community commitment to supporting children and parents to achieve the best possible outcomes for their children. We believe that child care is part of a continuum of early learning that stretches from pre-natal support for expectant mothers through early childhood development, early learning and child care programs and into the formal education system. Although not specifically referenced in this discussion document, this continuum of learning includes Family Resource Centres, Ontario Early Years Centres, Family Literacy Centres, Public Health programs and Neighbourhood Family Centres. London-Middlesex encourages the continuing integration of these early learning and development initiatives by the Ministries of Education, Health and Children and Youth Services.

It is the approach to child care and early learning that needs modernization, not necessarily the partners that operate within the system. London-Middlesex has a dynamic child care, early learning and early childhood development network. While we acknowledge that there is room for improvement, we also celebrate that in our community there are innovative providers who continue to successfully navigate the ever changing child care environment. London-Middlesex’s child care network is proud to include world renowned leaders in early childhood curriculum, special needs inclusion, business systems, and professional development. As a community, we are leading the way in the integration of initiatives for children, youth and families, including our Neighbourhood Family Centres, our Ontario Early Year’s Centres and our Recreation programs.

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OPERATING FUNDING FORMULA

“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.” – Modernizing Child Care in Ontario

Guiding Principles

The Ministry of Education’s funding allocation to the London-Middlesex CMSM is made up of over 20 separate funding envelopes, each with its own objectives, guidelines, restrictions and reporting requirements. There are certainly opportunities to simplify and streamline this system based on the following guiding principles:

A strong early learning, early childhood development and education system strengthens all Ontario, and child care is a critically important component of this continuum of learning. Research from around the world has continually shown that public investment in child care and early childhood education delivers long-term positive benefits for both the child and the family. In turn, these benefits accrue to all taxpayers and residents of Ontario regardless of their direct use of the child care system through improved public health, higher standards of employment and a stronger economy. Therefore, it is a given that Ontario will continue to invest public funds to support an integrated and efficient system of early learning supports for families. A fully funded, universally accessible early learning system is the ideal outcome for most proponents of the child care system. However, given the current economic realities of our Province, it may take many years to achieve this objective and the Provincial funding approach must necessarily reflect this reality.

The child care and early learning system should be supported by the Provincial tax base. However, direct parental contributions to the cost of child care should also remain a component of any funding mechanism. Not only do parent fees increase the total pool of available resources that can be invested, they also ensure that parents and service providers maintain direct influence over the child care options that are available to them.

Funding for child care needs to be stable, predictable and permanent. There needs to be equity in funding levels between regions, while allowing for local flexibility and expertise to effectively respond to community need. Parents, service providers and service managers need long-term indexed funding commitments in order to effectively plan and support the development of a quality child care system. In return, each of the partners should be held accountable for achieving objectives and outcomes established by the Ministry of Education.



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Funding Formula

Discussions about funding formulas for child care have typically approached the question from either the “supply” side or the “demand” side of the issue. However, both of these perspectives have weaknesses that limit their general applicability.

The “supply” based funding formula approach generally starts with what is currently available in each community and focuses on funding what is there already. While this helps to stabilize the existing system, it also tends to preserve the regional inequities that currently exist. Areas where there is already a higher concentration of child care spaces will typically have a funding advantage, while rural, remote and rapidly growing areas where the concentration of child care spaces is typically lower will find it harder to grow their networks and to achieve equity with other regions.

The “demand” based funding formula tends to focus on demographic criteria such as population. The major challenge with a demand based approach is that the demand curve for child care is highly elastic - as the cost to the parent for the service decreases, demand can increase dramatically. Quebec’s experience with the introduction of the \$5.00 per day child care program is recent proof of this elasticity.

London-Middlesex proposes that rather than a supply or demand approach, the Ministry of Education articulate a “strategic funding” approach that takes into consideration the following four elements:

1. The number of children within the CMSM/DSSAB, gathered either at the macro level (i.e. all children under the age of 12) or sub-classified by specific age groupings;
2. A Provincially established strategic objective for the level of child care services that are available within each CMSM/DSSAB, possibly expressed as a percentage of the total child population. This service level expectation could be expressed at the macro level (i.e. enough licensed child care spaces for X percent of the child population) or further sub-classified by specific age groups;
3. A Provincial metric reflecting the average cost to operate a child care space across the Province. Given that personnel costs account for approximately 75% to 90% of the total cost of providing child care programs, this cost metric must be related to labour costs. Given that overall labour costs in child care are now being driven by the wages and benefits paid to RECEs by School Boards, there must be a direct connection between the cost-of-care metric and the salaries paid by School Boards; and
4. A clearly articulated understanding of how the total cost of providing child care is to be cost shared amongst parents and the Provincial and Municipal levels of government. (Note – The London-Middlesex CMSM believes that since child care and early childhood education is a critical component of the entire education system, government contributions should come exclusively from the Provincial tax base and not from the Municipal property tax base.)

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One Funding Envelope, Local CMSM/DSSAB Flexibility

London-Middlesex proposes that the existing 20 plus funding envelopes it receives be consolidated into one funding envelope. Within that consolidated envelope CMSMs/DSSABs would be required to support four critical system components that fall into two specific categories. These components are:

Category 1 – Funding intended to support the entire child care system

1. **Base Program Funding** - Funding provided to all licensed child care programs (including centre based and licensed private home care) to stabilize and support the provision of child care services to all families in the region, regardless of income. This Base Program Funding would replace the existing Wage Subsidy funding, and would be used to support all aspects of the program’s operations, including facility costs, repairs and maintenance (both operating and capital), professional development and program expenses in addition to wages;
2. **System Development Funding** – Funding allocated to the CMSM/DSSAB to support the development of programs or initiatives (i.e. quality improvement, targeting at risk populations, professional development, etc.) that are specific to the region’s needs;

Category 2 – Funding intended to support specific children and families

3. **Fee Subsidy Funding**- Funding managed by the CMSM/DSSAB that provides eligible parents with a fee subsidy to help them afford the parental contribution requirement in the system;
4. **Special Needs Resource Funding** - Supplemental funding managed by the CMSM/DSSAB that is available to parents and service providers to create and support accessible inclusive environments for children with special needs.

CMSMs/DSSABs need flexibility within their funding allocation to use the total available funding in ways that make sense for their community. If CMSMs/DSSABs receive one consolidated funding allocation as described above, they should also be required to submit a plan to the Ministry of Education outlining how they intend to allocate the total funding across the four critical system components. Alternatively, the Ministry of Education could establish specific dollar amounts or percentages the CMSM/DSSAB is expected to flow to each component. Either way, the CMSM/DSSAB would be required to report service data relevant to the planned allocations.



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CAPITAL FUNDING PRIORITIES

“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.” – Modernizing Child Care in Ontario

London-Middlesex supports a "schools first" capital funding model. We believe that there is a continuum of learning and development that extends from expectant parents to young children to successful secondary and post-secondary students. We agree with the premise that the promise and expectation of Full Day Kindergarten will only be fulfilled if the “0 to 4 front-end” gets built at the same time. We embrace the value of connecting children and parents to supports that help build a solid foundation for educational success long before they enter the formal school system - in London we are actively engaged in the development of Neighbourhood Family Centers located at, and in partnership with, local elementary schools to help accomplish this objective. We believe that by integrating child care and early learning programs into school environments, we can help strengthen the continuum of learning and improve educational outcomes through the family’s early attachment to the education system.

However, we believe a schools-first policy will be most successful if it also is based on certain principles, including:

Investments in child care spaces at school cannot be made at the expense of existing community child care programs. Child care spaces in schools must either offer community child care programs the opportunity to relocate into and integrate with the school, or be based on a robust market analysis and business plan demonstrating the community's need for additional spaces. This business plan should be created using a standardized template that justifies the identified need and discusses potential partners, business viability, the organization’s management capacity, etc. Care must also be taken to ensure that the capital grants used to create school-based child care do not create a financial disadvantage for existing community based programs that must continue to pay rent or a mortgage.

Both school-based and community Investments in child care spaces must be based on plans that are jointly submitted by School Boards and the CMSMs/DSSABs. London-Middlesex benefits from a strong and respectful working relationship amongst partners that share a common vision for early learning and early childhood education. Regular community meetings and discussions have helped to establish this level of trust. However, in other jurisdictions, Ministry of Education facilitation of these conversations may be helpful in developing good partnerships.

Jurisdictional and operational issues must be answered through policy solutions developed at the Provincial level. The agreements and operating criteria between local School Boards and child care operators that determine how space is used and shared must be based on consistent Provincial templates that embody the spirit of an integrated education/child care system and that recognizes the parent’s and provider’s needs to have programs operate on non-instructional days. The Ministry of Education should establish standard operating criteria for long term leases, hours of operation and occupancy costs. Uniform policies, such as the application of a School Board’s boundary policy, may be required. Additionally, the roles and responsibilities of each of the partners (i.e. School Principal, School Board, child care provider and parent) must be clearly established and understood. To facilitate the operating cultural shift required to successfully implement the schools-first policy, the Ministry of Education could include incentives for Schools/School Boards that proactively seek out opportunities to develop child care spaces in partnership with their CMSM/DSSAB.

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School-based child care will be unable to fulfill all of the community's need for spaces. Where adequate school-based spaces cannot be developed to meet community need, additional funding should be provided to the CMSM/DSSAB to support the creation and start-up of community spaces - this funding could take the form of one-time capital grants, low-interest loans or mortgage and interest subsidies for specific lengths of time. To support the connection between child care and schools, School Boards could adopt a "family of child care programs" model that strengthens the programmatic relationship between schools and the child care centres and licensed private home child care programs that surround them.

Regional Equity - Capital investments in both school-based and community-based child care presumes that there is a Provincial expectation for the level of child care availability within each region and across the Province. Incremental capital investments should be available to support the expansion of services in areas that are not well served.



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QUALITY PROGRAMS

“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.” – Modernizing Child Care in Ontario

Experience tells us that while poor quality is easy to recognize, high quality is often difficult to define. What constitutes “quality” is often defined in terms of one’s own personal perspective, and is therefore subjective. Quality is also dynamic, reflecting ever-changing, ever-improving standards, knowledge and experience.

Evaluating quality in child care settings is even harder to do, since the assessment process includes many hard-to-define elements such as the quality of the interrelationship relationships, the learning environment, program philosophy, and cultural and economic influences. Quality assessment must also take into account the unique perspectives of the child, the parent, the educator and the funder.

Despite this challenge, there is a need for a process that allows parents, funders and regulators to assess the quality of care available in child care programs.

Assessment of Program Quality

Licensing compliance and quality assessment are steps along the same continuum. At one end of the continuum is basic license compliance, where the rating is made relative to rigid, static and defined standards. Somewhere in the middle of the continuum is discrete quality assessment, and at the other end is continuous quality improvement.

Because there is such a difference between license compliance and quality improvement, each must be approached separately. Our perspective is that if the assessment of quality based on a uniform framework is the tool, then continuous quality improvement across the system is the outcome.

A Quality Framework - London Middlesex supports the development of a universal framework to assess quality in child care programs that is built on measurable and understandable indicators. As noted in the *Modernizing Child Care in Ontario* discussion paper, any assessment framework must be applicable to all program philosophies, age groups and program models. The framework needs to address quality from many different perspectives, such as from the perspective of the child, the parent, the educator, the centre’s administrative leadership and Board of Directors, the funder and the community. As well, the framework needs to approach quality assessment holistically, including common principles and indicators for multiple components such as environment, personnel, program/curriculum (including the relationship to the Ontario Early Learning Framework and the Kindergarten Curriculum) and the relationships between children, educators and parents.



While there is tremendous value in being able to evaluate quality in a particular program at a given point in time, we believe there is even greater value for all stakeholders if the assessment process

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promotes continuous improvement in quality over time. Assessment approaches such as the one used in the ECERS and ITERS systems not only provide a rating at a given point in time, but also describe what constitutes higher levels – this approach helps define a quality improvement path for individuals and programs.

Investing in Early Childhood Professionals – A critical component of any quality initiative has to include an investment in the professionals that are responsible for the service. In the current operating environment, RECE recruitment and retention are significant challenges that must be addressed before any quality improvement program can gain traction in our community.

The CMSM's/DSSAB's Role in Quality Assessment and Improvement – London-Middlesex

proposes that while it is the Province's responsibility to develop this universal framework, it should be the CMSM's/DSSABs responsibility to ensure that the framework is applied appropriately within each region, and that the results of the evaluation are used to improve the local system. (As discussed later in this document, this quality assessment role needs to be separate and apart from the licensing and compliance requirement.) Facilitation of a community based Quality Assessment and Development Program that is broadly supported by the local child care community should be included as an expected function of the Consolidated Municipal Service Manager.



CMSMs/DSSABs could be expected to submit an annual three year rolling Quality Assessment and Development Plan to the Ministry of Education as a condition of funding. This plan would identify how child care providers are involved in the plan, evaluate where the CMSM/DSSAB is in terms of current quality, and outline how the information obtained through the assessment process would be used to improve quality across the local network over time.

A Community-Based Peer Accreditation System – The child care community in London-Middlesex believes that peer-driven quality improvement programs (such as the Raising the Bar) are the best approach to engaging child care organizations at the local level, as they lend themselves to mentoring, inter-professional communities of practice and resource sharing opportunities. Participation in the Quality Assessment and Development program should be a condition of having a Purchase of Service Agreement with the CMSM. Programs should be expected to complete and report a quality audit every two to three years and be required to participate in on-going program and professional development opportunities. Results of the quality assessment process within each program should be made available to parents in the same way Day Nurseries Act licenses are posted.

Investing in Quality Improvement – All child care organizations understand the value of investing in quality improvement but many lack the time, staff, or financial resources to do so. Even identifying where to go to learn about quality can be a challenge. The Quality Assessment and Development Plan would require CMSMs/DSSABs to ensure there are appropriate learning opportunities available in the community, and explain how the Ministry of Education funding would be used.

Incentives for Quality Improvement – Our community has discussed the concept of tying the level of funding received by programs to an assessment of program quality. We have put further discussions on this issue on hold for two reasons – there is no recognized way to uniformly measure quality on a consistent basis, and there are funding inequities in the current system that

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put some providers at a financial disadvantage (i.e. differences in Wage Subsidy funding between providers) that make it harder for them to invest in quality improvement initiatives.

Communicating with Parents and Service Providers about Quality- Most CMSMs/DSSABs and child care organizations have developed some form of information package that helps parents choose an appropriate, high quality child care setting. These various brochures could be compiled into one Provincial message and then shared with parents through multiple media formats. Topics could include the difference between various models of care; how to recognize quality environments; and what outcomes to expect from quality environments. London-Middlesex also suggests the development by the Province of a parallel set of on-line tools (i.e. webinars, videos) to support service managers, child care providers and their administrative leadership.

Special Needs Resourcing

The demand for special needs resourcing in London-Middlesex far exceeds the current level of funding, and the problem is expected to get worse as Full-Day Kindergarten becomes fully implemented. Funding for special needs supports has not been tied to demand, and as more children enter into child care and Full Day Kindergarten programs, more children who need supports are being identified at younger ages.

Identifying Best Practices - Responsibility for determining how children with special needs receive supports should continue to be part of the CMSM's/DSSAB's service management role. However, it is noted that across the Province, CMSMs/DSSABs use different approaches to providing special needs resources in their communities. The Ministry of Education should document and share these different approaches and identify the strengths and best practices associated with each. CMSMs/DSSABs could then determine if their approach to system management is the best fit for their community.

Establish a Special Needs Resource Community of Practice - The capacity of CMSMs/DSSABs to manage special needs resourcing varies from jurisdiction to jurisdiction. The Province could establish and moderate an on-going Special Needs Resource Community of Practice to solve common problems and to develop and share new approaches. London-Middlesex would be pleased to help the Ministry of Education facilitate the development and start-up of this Community of Practice, which could be made available to CMSMs/DSSABs across the Province through a combination of web resources (i.e. webinars, blogs, etc.) and annual or semi-annual conferences.

A More Consistent Approach - The CMSM's/DSSAB's capacity to consistently manage special needs resourcing could be improved if there were Provincial guidelines associated with the funding. While still allowing for local solutions, the Ministry of Education could establish a more uniform service model through the development of eligibility criteria (i.e. physical, mental health, social needs), methods for prioritizing access to services, and methods to determine the type and level of support available to each child. These guidelines should also define expected outcomes for inclusive environments and provide a toolkit for measuring the achievement of these outcomes. The Ministry of Education should establish professional criteria for the individuals working in the provision of the service - in addition to advanced knowledge in the specific areas associated with children with special needs, strong interpersonal, communication and facilitation skills should also be considered as essential job skill requirements.

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Supporting Children Through Transitions - The quality and continuity of special needs supports received by children and parents would be enhanced if the jurisdictional and funding barriers that impact the transition from child care to elementary school could be eliminated. The Ministry of Education needs to ensure that there is continuity in the level of supports received by children and families as they transition from one system through the next. There are several pilot projects currently underway in the Province researching how to ease the transition barriers for children receiving speech and language support. The learnings from these projects should be applied to the entire special needs sector.

Expansion of Services for Children with Special Needs - London-Middlesex has identified the potential to expand the range of services available to children with special needs from being just licensed child care to including many other recreation types of options. For example, the City of London has developed a nationally acclaimed inclusion program for municipally operated recreation programs, and has been offering training for this model to other recreation service providers in the City and across the Province. Together with a restructuring of the regulatory framework governing the care for 6 to 12 year olds, this could help develop more learning and recreation options for children with special needs and their families.





A MODERNIZED LEGISLATIVE AND REGULATORY FRAMEWORK

“To put the child care sector on the path towards 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.” – Modernizing Child Care in Ontario

As noted in the *Modernizing Child Care in Ontario* discussion guide, there is a need to update the current legislation and regulations that govern the child care sector so as to better align these requirements with the changing needs of children, parents and service providers. London-Middlesex’s suggestions in this area include:

Broadening the Education Act - The Day Nurseries Act should be eliminated and the Education Act modified to include a specific “section” for an Early Years Division. The sections of the Day Nurseries Act dealing with facilities, policies and procedures and staff-to-child ratios would form the basis of this new Early Years section, with additional legislative support for the “care” and “quality” components. It is noted that these regulations would need to apply equally to school and non-school environments.

Ratios - Greater flexibility needs to be built into the regulations relating to staff-to-child ratios and age groupings. Some of the possibilities that have been suggested by the London-Middlesex child care community include:

- Using age groupings based on pre-determined developmental milestones instead of discrete ages
- Having alternative licensing configurations available (i.e. age groupings of under 12 months, 12 to 24 months, 24 to 48 months and 48 to 60 months)
- Including the ability to mix infants and toddlers during opening and closing hours
- Greater flexibility with respect to mixed age groupings (i.e. more than 20% of the children and more than one room per centre)
- Introduction of a Family Grouping License (3 Infants, 5 Toddlers, and 8 Preschoolers) in one grouping for small centres and rural locations, through which a full spectrum child care program can be accommodated within a physical space approximately the size of a Full Day Kindergarten classroom.

Licensed Private Home Child Care - Licensed Private Home Child Care programs in Ontario have not developed or been supported in the same way as centre based programs. Yet licensed private home child care continues to be a valuable, cost efficient and flexible option for parents, especially those who live in rural communities or who work shift and extended hours.

This important sector is on the brink of collapse. Immediate changes to the regulations governing the number of children allowed per home are needed to address the impact of Full Day Kindergarten. The regulations governing child ratios should be consistent for providers working in both the regulated and unregulated home child care sectors, as has been recommended by the Home Child Care Association of Ontario. London-Middlesex’s licensed private home child care providers have made the specific suggestions that providers be allowed to care for two children under 18 months with a maximum of three children under the age of 3, and that the provider’s own children over the age of 4 be excluded from the total number of children allowed in the residence. As well, the value of allowing two home child care providers to operate from the same residence could be explored for communities where there is insufficient demand to support a larger centre.

Licensed private home child care is an inexpensive model (both to operate and from a capital

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funding perspective) that provides another flexible and responsive quality care option for parents, especially those in rural and remote areas where centre based care is not available. Investments should be made to expand the availability of this option. The funding that supports the administration of licensed private home child care systems should be restructured so that providers do not have to recover the cost of administration from the providers. This would also enhance the viability of the provider's operation and make them more cost competitive with unregulated providers.

To complement the modernization of the regulations regarding ratios, a Provincially sponsored public awareness campaign to explain the value of licensed home care versus unlicensed home care should also be developed to support parents in making informed choices.

Unregulated Child Care - As referenced in the *Modernizing Child Care in Ontario* discussion guide, it is recognized that there is a difference between the informal personal arrangements parents make with family members and the arrangements made by parents with non-related unregulated care providers that essentially operate as businesses. Comments in this section deal only with this latter group.

It is understood that unregulated child care is a necessary option for many parents. However it is argued that the main reason this option exists is because there is not an adequate supply of affordable licensed options available to parents. We are concerned that the development of a registry of unregulated providers will give parents a false assurance of quality. Rather than try to regulate providers in this sector, we believe the Province should be investing in the expansion and promotion of the regulated centre, school and licensed home sectors. To further support the value of licensed child care options, the Province should:

- Encourage both informal and unregulated child care providers to be associated with the Ontario Early Years Centres, Neighbourhood Family Centres or other family support type programs in the community. The importance of this association should be stressed in the promotional materials discussed previously
- Require all Ontario Works child care recipients to use licensed child care options
- Attempt to align federal and provincial tax credits to support parents who choose a licensed child care option

Regulatory Framework for 6 to 12 year olds - London-Middlesex believes that there is a continuing need for some form of regulatory oversight for programs for 6 to 12 year olds that includes some of the best practices of accredited recreation programs, such as those used by Parks and Recreation Ontario. This framework also needs to reflect the significant developmental differences between a 6 year old and a 12 year old, perhaps with different program and staffing requirements for 6 to 8 and 9 to 12 year old age groups. Operators providing service within these age groups would be expected to adhere to these standards, at least in order to receive funding or have a Fee Subsidy Purchase of Service Agreement with the CSM/DSSAB.



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In the *Modernizing Child Care in Ontario* discussion guide it is unclear if the “review of regulatory standards for child care” will continue to include standards for children up to age 6, or just up to age 4. If the latter, then the regulatory framework suggested above for 6 to 12 year olds should be broadened to include standards for 4 and 5 year olds in order to allow for before and after school and non-instructional day options for these children.

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SUPPORT FOR ACCOUNTABILITY AND CAPACITY BUILDING

“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.” – Modernizing Child Care in Ontario

Historically in Ontario, child care programs were developed in response to a specific community or parental need. As a result, there are thousands of unique child care programs, each operating independently from the others. Organizations range from very small nursery school programs to very large multi-site enterprises. Most child care is non-profit, but private and municipal operators play important roles in meeting the community’s need. Establishing accountability and compliance standards that apply equally to all will be challenging.

Data Collection, Evaluation and Reporting

Data Elements - A starting point for system development could be the mandatory provision of data elements that are common to all service providers - operator identifier, licensed and operating capacity, staff qualifications, key personnel and administrative leadership, fees, operating criteria, etc. These data elements already comprise much of the annual Day Nurseries Act licensing process. Using web-based technology and a standardized template, operators could be required to submit these data elements to the Ministry annually. It would then be relatively easy for both the Province and CMSMs/DSSABs to roll up the data, identify trends and develop plans in response to changing needs.

Common Screening Tools - There is some concern within London-Middlesex with respect to the use of a common developmental screening tool. While there is support for a more consistent approach to developmental screening, the concern is that some tools do not approach the child from a strength-based perspective, and there can be a tendency to “teach to the tool”. Our community also recognizes that developmental outcomes can be influenced by the age at which a child enrolls in a program and the frequency at which he or she attends. Unlike the formal school system, with its defined schedules and attendance expectations, children in child care enter throughout the year and often attend on a part-time basis. The concern is that a common developmental screening tool, especially one connected to an evaluation of the program’s quality or efficiency, may not fully reflect the impact of the child's attendance in the program.

Despite these concerns, our community does supports the development of a common observation-based “report card” system that emphasizes the child's strengths and documents his/her work in a portfolio that can follow the child through her or his early learning experience.

Common Registration Forms and Tracking Mechanisms - London-Middlesex believes that a common registration form and student tracking mechanisms can solidify the relationship between child care and the school system. We also see these as having value as a way to facilitate the “report card” system discussed above. However, since many children experience multiple early learning environments before settling down into their “home school”, there may be administrative and information privacy concerns that make these tools hard to manage. The child care community has also expressed concern that if a program evaluation and accountability process is attached to these tools, and the child moves from environment to environment it will be hard to determine the impact any one program had on the child.

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Licensing Compliance

In our community discussions, London-Middlesex identified that there is a difference between license compliance and quality of program. License compliance relates to whether the program needs established minimum standards in respect to health and safety, facility and equipment, staff qualifications, etc. Quality measures tend to reflect the nature of the relationship between educator, child and parent, the depth of program and curriculum planning and the impact or outcome the program has on the child and the family. It is suggested the processes of measuring compliance to the licensing standards and evaluating quality should be separate and distinct.

London-Middlesex does not support a greater role for the CMSM in compliance related licensing. License compliance is essentially about meeting a pre-determined minimum standard, not determining the quality of the program that is offered. We are concerned that if CMSMs/DSSABs are required to assume license compliance responsibilities, the compliance process and the minimum standards would become even more inconsistent from jurisdiction to jurisdiction. We believe that an independent third party would bring greater value to the licensing process, and would help to mitigate the potential conflict of interest and tension that would be created if the CMSM becomes the funder, system manager and regulatory authority. Finally, license compliance inspection is not currently within the CMSM's area of expertise, and we anticipate significant pushback around the growth of the municipal bureaucracy that would be required.



London-Middlesex does support a streamlined risk-based licensing approach that benefits consistently compliant operators and focuses more on new and developing programs. Additionally, London-Middlesex is home to many multi-site operators and sees the advantage in a system that licenses the operator, and not necessarily each individual centre.

Sector Leadership

Many child care organizations in London-Middlesex benefit from strong Boards and Administrative Leadership. London-Middlesex's objective is to ensure the continuing strength and development of these leaders, while making it easier to recruit and retain current and future sector leaders.

Within the child care sector it can be a challenge for many non-profit programs to recruit and retain Board members and senior management personnel. While the value of having better qualified administrative leadership is well understood, the concern has been raised that mandating some form of required education or knowledge for Board members and Executive Directors may make it even harder to attract people for these leadership roles.

It is suggested that the Ministry of Education establish a series of professional development workshops to support various aspects of administrative leadership. These workshops could be provided as webinars, or in person through a partnership with the CMSM/DSSAB. The administrative leadership's participation in these workshops could then be reflected as a component of the quality evaluation mechanism discussed elsewhere in this report. Similar to what was proposed for Special Needs Resources, the Ministry of Education could facilitate regional Administrative Leadership Communities of Practice, with annual or semi-annual conferences being organized to support the professional development of Board Members and the administrative leadership of child care programs.

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CONCLUDING REMARKS

The child care community in London-Middlesex is excited about the potential improvements suggested in *Modernizing Child Care in Ontario*. The evolving partnership with the Ministry of Education will help to maintain the viability of the existing child care sector. More importantly, modernization will help to create an even more cohesive and integrated system of early learning opportunities for children in Ontario.

After all, the child is always at the heart of what we do.

