

January 2, 2017

The Honourable Indira Naidoo-Harris
Associate Minister of Education (Early Years and Child Care)
Early Years Division
Ministry of Education
900 Bay Street, 24th Floor, Mowat Block
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Dear Associate Minister Naidoo-Harris:

Response to your request for comments on the “Building A Better Future” discussion paper

The following reflects our view on some of the important factors that will have an impact on the makings of an accessible, responsive, affordable, and higher quality early years and child care system in Ontario.

Just one thing, though, before getting to the meat of this letter: We don’t see this as the beginning of the conversation; we see the conversation as ongoing. This particular discussion is past the mid-point and even closer to the finish line than we might ever have imagined. We think, with a continued commitment to good *system* development in your renewed framework for the Early Years and Child Care, you could really hit the ball out of the park and complete the work that we saw surge forward first, in 2009, with Charles Pascal’s *With Our Best Future in Mind*, and then, in 2010, with the implementation of many of his recommendations for system redesign, including full day kindergarten.

If we know anything from the history of child care in Canada, it is this: provincial *leadership* counts. Sure, a comprehensive federal framework accompanied by sufficient funding is important - essential – to what happens here in Ontario. But, we’ve been seeing nebulous notions of parental choice and flexibility creep into the narrative on the federal front. What frightens us with “choice and flexibility,” is that these words suggest an invitation for neoliberalist stifling of what could otherwise be - finally – a real, public system of *provision* of early childhood education and care on a national scale. This suggests to us that provision of an accessible high quality early years and child care system is still going to be determined by the provinces (and territories). At the same time, our remarks aren’t intended to detract from a similar call for a strong federal framework that will set a foundation for public provision of ECEC in provincial and territorial systems.

Also for the record, we still see many of the not yet implemented recommendations from Charles Pascal’s *With Our Best Future in Mind* – especially for the seamless extended day of full day kindergarten that is staffed and delivered by Early Childhood Educators who are (unionized) school board employees; for school organized and delivered before and after school programs; and, for child and family centres that are at their core full day child care from which parents can choose their ideal hours of use – as still necessary to our early years and child care system in Ontario. We agree Ontario needs a strong

framework for the early years and child care. If, for whatever reason, it has to be called a “renewed” framework, so be it.

What is needed now, for the early years and child care system, can be achieved in a gradual, orderly transition following from the innovative work that was set underway when your government created the public alternative to private delivery of early childhood education and care in Ontario for children ages four and five years. The reality is that more than one quarter of families in which parents are working or in school for 30 or more hours per week, have no regular child care arrangements. They resort to split shifts and weekend work which results in poorer work-life balance, reduced family time, and increased stress. And, of the children who are in a care arrangement full-time, more than one third are in informal care arrangements.¹ Rather than “pacing the cage”² of private operation of service delivery that restricts real access to early years and child care for children birth to three years, it would be nice if, eventually, there were a public early years and child care system with no portion of it reliant on private delivery for children younger than six years.

We hope the renewed framework for the early years and child care receives the same level of policy intent and implementation commitment as full day kindergarten has had. Thus, we are delighted you have asked for our feedback on how you should build a better future through a renewed framework for the early years and child care.

Avoid getting stuck in a low quality trap

Given the timing of the next provincial election, it is understood that there is a certain degree of pressure for the current Government of Ontario to deliver quickly on promises that have been made this year. The Throne Speech identified the Capital funds that are to go into the creation of 100,000 new child care spaces and subsequent media reports and informal discussions suggest that annual operating funding of approximately \$650 million will be made available by the end of the 5 year period.

This is a good time to remind ourselves of what can happen when there is rapid expansion of a child care system for the sake of access and affordability without continuous commitment to quality. Pierre Fortin, in his 2016 Gideon Rosenbluth Memorial Lecture this past November, referred to the Quebec experience as being “stuck in a low-quality trap.” He identifies this “hardly [a] desirable option” as the consequence of a government striving to improve affordability for parents while still restraining the provincial child care budget. An underfunded child care system that is made more accessible for parents by reducing their fees comes at the expense of an early childhood system delivered by competent, qualified educators. Actual costs of child care are much higher than the prices that parents or the subsidy system ever pay, especially for infant and toddler spaces (for which parent fees are more in the range of half the actual cost of a space).

When the Government of Ontario makes realistic forecasts for amounts of operational funds needed for the expansion of licensed child care spaces, the actual supply costs of licensed child care spaces as

¹ General Social Survey of Canada, 2011

² Bruce Cockburn (1996).

opposed to the current - frankly, low ball - prices that are charged to parents must be considered in all their (sure, frightening) truth.

In the rush to fulfill the Government's vision, it is essential that an appropriately funded infrastructure is put in place. Special attention must be given to situations and conditions where the risks are known to be highest and where the potential returns of a high quality system are going to have a greater impact. The available data across a number of jurisdictions, including Quebec and the City of Toronto, document that levels of quality of child care services and levels of access to licensed child care suffer most in low income, high need areas.

When system design and comprehensive public policy are short-cut to meet rapidly approaching political deadlines and when program implementation is short-cut to achieve politically compelling (but not always the most coherent) promises this can lead to long term consequences for the overall child care system.

Case in point, when you made your speech at the September AECEO/OCBCC conference in Ottawa, it was indicated that the Province will be looking to provision of more accessible and affordable child care through increased Home Child Care and, possibly, expansion of the for-profit sector. It is important that we consider why it is that the most nimble and cheapest form of licensed child care in Ontario is delivered by home child care providers who work with licensed Agencies. This form of licensed child care is low-compensation "by design" and its low capital and operating expenses make its expansion a desirable option for rapid expansion of spaces while maintaining a limited provincial budget. That home child care is more affordable (for parents and for funders) should not distract any of us from the root cause of its affordability. Many home child care providers working with licensed agencies are systematically marginalized workers. If they were compensated in the same way that staff in child care centres are – with an hourly wage, even if just minimum wage - the home child care system would not have the same appeal as it does right now as a method for expanding accessible (affordable) child care in Ontario.

In our September 12, 2012 feedback to the Province on child care modernization, we made several recommendations for how to support quality. Some of the recommendations, we see, have been woven into Provincial strategies; and other not yet implemented recommendations that we made, we still stand by – and hope you will consider. One recommendation that we would like to highlight from that paper is anchoring licensed home child care (actually, we recommended centres be anchored too) to Pascal's proposed model of Child and Family Centres in order to strengthen home child care. There is still potential for this as a "strengthened" of home child care, if providers were anchored to proposed Ontario Early Years Child and Family Centres. The stability of the OEYCFCs is what would matter most if this were to be a successful model. At the very least, OEYCFCs would have to be physical spaces, consistent across Ontario, and sturdily governed with high levels of operational accountability to a number of specific elements that are consistent with higher levels of structural, process, and relational/orientational quality in early childhood education. So far the guidelines for OEYCFCs do not promise that they will have these characteristics in all service areas across Ontario.

Whether there is a change in the model of home child care in Ontario or not, there is no room in a high quality system for any component of or set of services within that system to be held to a lower level of standards. With that in mind, all home child care providers should be subject to individual licensing and annual health and safety inspections by personnel who are independent from the operator; additionally every home child care provider should demonstrate evidence of relevant pedagogical training and ongoing involvement with an anchoring organization in order to receive public funding in any form.

This proposal, in essence, changes the role of Home Child Care agencies to program and pedagogical support while integrating them closely into the overall system of child care and early years centres; in many cases, depending on results of local service planning, existing (and proven to be well operated) home child care agencies could be repositioned as “early years” service agencies that focus on enhancing system competence. We do not support any process of organizing the early years and child care system through private (including not for profits), non-governmental agencies without direct and specific local accountability (akin to the “Trusts” in England and Wales), this would be absolutely counter-productive to local service planning and integration.

Modernize system planning

As ironic as it might sound, system design that is based on parent *need* is sometimes just another way of *caging* the early years and child care system. It is already evident that parents do not have the early years and child care options they need – good (and not so good) child care programs across Ontario have waitlists; families are approved for fee subsidy (in some communities) and then cannot find a licensed space – or families find a licensed space (in some communities) and then are put on a waitlist for fee subsidy; many parents who are commuters, shift workers, or weekend workers are left with no option but unregulated care to meet their nonstandard work hours; children experiencing disability face barriers to participation in licensed child care that still (even though it’s 2017!) interfere with their families’ non-precarious involvement in the full time workforce; and, the current family fee formula discourages part-time care and discriminates against families that work non-standard schedules.

The rhetoric of asking “do parents have the early years and child care options they need?” might prevent us from seeing strengths in the system that already exist. There are strengths in the existing framework that just need to be activated in the renewed framework. *Schools First* is so close, *so close*, to being the “real thing”³ – some communities are integrating early years programs and child care into schools as was recommended by Pascal; however, so many other communities have failed to thrive in their cooperative planning relationships between municipal authorities and school boards. Zachary Spicer explores many aspects of government planning and administration, especially where they intersect between municipal and provincial levels. His research shows that while some degree of informality in planning relationships for essential services may be beneficial – for modern planning, informality only works in situations where the relationships are long term and proven trustworthy. On the other hand, for new partnerships (which is the appropriate way to describe this new planning situation with school board involvement in the early years and child care system), planning and

³ Coca Cola doesn’t have to be the only real thing out there, does it?

implementation effectiveness is strengthened when the expectations are explicit, processes are formalized, and decisions are well-documented for public scrutiny.⁴

Acknowledge cost

This year in particular, we appreciate that the Ontario Government is experiencing heightened pressures to make licensed child care more affordable for families in this province. The release of the excellent Cleveland, Krashinsky, Colley and Avery-Nunez “City of Toronto Child Care Demand and Affordability Study” in October 2016, adds to the pressure that something “must be done” to make child care more affordable for families. We agree something must be done; and so does Social Development Minister Jean-Yves Duclos, who, in mid-December, announced that the federal government is clearly hearing the message that affordability must be dealt with in their coming strategy for a national ECE program. Prime Minister Justin Trudeau, in a year end press conference on December 12, acknowledged that without a national perspective on child care, families are challenged in their ability to work and raise their families the way they would like to.

Where we might differ from others in how we view *affordability* is this: We know that good child care cannot be produced more affordably. We think it should cost more with investments in better wages, benefits and ongoing staff education. Thus, while the share of the cost that parents pay (that means the price) should unquestionably be lower; good, accessible child care will not exist unless public funds cover more of the (high) operating costs associated with high quality care.

Quick fixes with catchy slogans of the (low) dollars-per-day-kind⁵ may speak in high volume to families who are struggling to cover the cost of child care while paying all of their other expenses; however, without *significant* public investments covering the actual cost of child care, the workforce will, inevitably, continue to subsidize this essential public service with low wages and almost non-existent benefits.

Focus on system competence

A high quality system is one that is predictable, the doors are open to all who want to use it – where they want to use it, and the workforce is well-prepared, highly qualified, skilled, and well-supported. Expanding a system without addressing the barriers to quality endemic in the current child care and early years system in Ontario is hasty.

It will be important to continue to develop good systems for monitoring early years and child care programs as this system is made more comprehensive. As has always been the case, a license is not a guarantee of quality; nor is a license-based system a definitive sign of system competence. Sorting out

⁴ Spicer, Z. (November, 2016). Governance by handshake? Assessing informal municipal service sharing relationships. Canadian Public Policy [ahead of print article, doi: 10.3138/cpp.2015-079].

⁵ Our estimate of the new \$25 per day pilot program in Alberta, with the public funds at the level that was announced by their provincial government, could result in compensation for ECEs at around \$17 per hour.

licensing and quality – including who measures quality and what is measured with respect to quality in this evolving early years and child care system demands more Ontario based scholarly research. Current methods of quality evaluation for licensed child care (such as operating criteria and licensing) assume operator independence (potentially making them less suitable for evaluating early years programs and kindergarten) and tend to focus on interactions between children and early childhood educators (which, while important, miss many of the daily aspects of early childhood education that are in addition to practitioners’ work directly with children).⁶ As the system changes, the existing licensing and quality measures should evolve. In the meantime, a move to risk-based licensing is a step in the wrong direction during system development when the child care system is undergoing significant change.

Ontario must also recognize that the levels of competency and commitment to achieving its early years and child care system objectives vary among the CMSMs and DSSABs. This calls for a strong provincial framework and high levels of service system management accountability. We recommend that you continue to build on the strengths of the existing framework – address the weaknesses outright, and keep Pascal’s recommendations very close in mind. Stagnation’s tools work best in the hands of the underprepared for the task. Be sure to request, review, and follow-up on all planning that has been shifted from the province to CMSMs and DSSABs. They have been providing feedback to the province that they are inadequately resourced for taking on some aspects of this new system without more help from the province. Demand that CMSMs and DSSABs articulate their plans clearly and vet them through their municipal councils – so that there is authentic accountability to the public in all aspects of this renewed system. Strategies without theory; data without conceptual frameworks; and local plans without documentation or accountability are distractions in this important period of system redesign that could, in turn, be world renowned. Many CMSMs and DSSABs are lacking the human resources and, in some cases, the planning capacity in their children’s services departments to design comprehensive and fair early years and child care systems that are not just replications of past approaches. Provide confident direction to the municipal authorities that you so heavily depend upon for the planning and implementation of this early years and child care system; provide support; and, hold them to a standard of performance that befits a world-class early childhood education and care provision.

Our recommendations for the renewed framework for the early years and child care are:

1. Carefully manage growth of the licensed child care part of the early years system. Growth in the supply of licensed spaces without a substantial corresponding increase in funding is premature. We are pleased that there is a proposed new investment for the development of spaces; yet, for the proposed number of spaces, the funding levels need to be high too. Diminishing quality in this next stage of early years and child care system development would be so disappointing.

⁶ Urban, M., Vandenbroeck, M., Van Laere, K., Lazzari, A., & Peeters, J. (2012). Toward competent systems in Early Childhood Education and Care. Implications for Policy and Practice. *European Journal of Education*, 47 (4).

2. Remain clear on the actual costs of child care operation and always distinguish between the fees (reported prices) that are charged for parents for their daily, monthly, annual use of child care. Current and *realistic* costs of child care must be used for determining the size of provincial funding envelopes. Acknowledgement of the real cost of child care is essential for forecasting appropriate funding levels. This is a major part of maintaining a motivated early childhood workforce and for sustaining any hope of delivery of high quality care through this early years and child care system.
3. Ensure that there is an adequate cadre of well trained, appropriately compensated early childhood educators in place before substantial expansion of the system takes place; this requires attention to recruitment and retention of new ECE graduates and systematic upgrading of the existing workforce.
4. Any provincial funding must be flexible enough to allow the municipalities (CMSMs and DSSABs) to manage the mix of capital and program funding, especially in those areas where suitable facilities must be developed over a short period of time.
5. Change the Education Act to enshrine a requirement to ensure that schools are configured to accommodate services for preschool children (all schools; the schools that “can’t do it” have to prove they can’t – not vice versa). This will require changes to the accommodation formula and reviews. Space planning should consider forecasted changes in the child population past the 5 year planning horizons.
6. The fee subsidy system needs to be modernized alongside these processes of early years and child care system development:
 - a. Expand subsidy eligibility for families in Ontario by reducing the 30% tax-back rate on taxable incomes over \$40,000;
 - b. Increase the \$20,000 exemption level above which a 10% tax-back begins. This threshold has remained unchanged since the beginning of income testing in Ontario;
 - c. Establish a pathway that ultimately leads to a tax-back level of approximately 10% of net income for all full fee parents - this can be accompanied and partially funded by changes to, or complete elimination of, the federal income tax Child Care Expenses Deduction;
 - d. Remove the “activity” requirements of subsidy eligibility for families. Permitting discretion for eligibility at the municipal service management level gives the impression that the Province of Ontario has backpedalled ever so slightly in valuing all children’s participation in early childhood education. Participation in early childhood education in licensed child care is good for children. It should be accessible for all families. For families who are at a level of income that makes them

eligible for receiving a child care subsidy, it makes no sense to hold them to other performance measures just so that local governments can feel reassured that they have allocated public funding only to those families who “deserve it.” Modernized early childhood education systems have no space for this “poor house” mentality of days gone by;

- e. Revise the family fee calculation to reflect actual days of care required; replace the current formula that divides the monthly fee by the number of days of care, with a more fair and stable formula that calculates a daily fee on the basis of 21.75 days per month and charges this amount for each day of care utilized by the family.
7. Develop a serious and accessible strategy for parental leave that is meaningful to families and that reflects the kinds of non-parental early years and child care provisions that the Ontario Government is willing to invest in. A twelve month leave program that has parents seeking extraordinarily expensive (and virtually non-existent) infant spaces for 6 months is a dropped thread in policy cohesion – technically, not a gap in services.
 8. Before there is any expansion of the early years and child care system through expansion of the home child care sector, the home child care model should be significantly reformed.
 9. Provide guaranteed access to early childhood education in the early years *and child care* system for three year old children in Ontario - for four hours per day. Parents could be responsible for paying the fees for remainder of the day if they wish to enroll their children in child care programs for longer than four hours each day.
 - a. It is perhaps obvious (but worth being explicit) that the four hours of early childhood education and care would be funded through *base funding* – the formula for which would have to account for suitable compensation for the ECE workforce; and there would have to be a high level of accountability for the provision of such a program (including to the public – similar to the existing full day kindergarten strategy).
 - b. This recommendation is rooted in extending the same values and principles of public education systems⁷ (i.e., the values and principles that led to the expansion of kindergarten to a full day in Ontario), to the development of public early childhood education for three year olds.

There are many more considerations in developing an accessible (affordable) program such as this one that we recommend (including the need to address the very sticky problem of how, within our existing Education system, there remains an untidy intersection of public governance for schools and independent governance

⁷ Moss, P. & Bennett, J. (2006). Toward a new pedagogical meeting place? Bringing early childhood into the education system. Briefing paper for a Nuffield Educational Seminar: September 26, 2006.

(as in, not for profit and for profit operation) of the birth to three sector); however, we think that even this “innovative” and sensational extension of the public Education system to three year old children in Ontario can be achieved through a gradual, orderly transition.

Sincerely,

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