



MODERNIZING CHILD CARE IN ONTARIO
CITY OF TORONTO RESPONSE TO THE PROVINCIAL DISCUSSION PAPER
September 14, 2012

CONTENTS

INTRODUCTION	3
A Vision for Child Care in Toronto	3
Child Care in Toronto	4
Consultation Process and Parent Survey	4
SERVICE SYSTEM ROLE	5
KEY AREAS OF THE DISCUSSION PAPER	7
Operating Funding Formula	7
Capital Funding Priorities	9
Quality Programs.....	11
Modernized Legislative and Regulatory Framework.....	12
Support for Accountability and Capacity-Building.....	15
FINAL COMMENTS	16

APPENDIX A – COUNCIL RECOMMENDATIONS

APPENDIX B – TORONTO CHILD CARE SERVICE PLAN 2010-2014

INTRODUCTION

The City of Toronto thanks the Province of Ontario for providing this opportunity to respond to the discussion paper, "Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together".

The recommendations contained in this report are intended to

- Support the development of a cohesive early learning system that includes both full-day kindergarten and child care as equal providers of early learning opportunities
- Assist in creating a funding model that addresses the challenges of parent affordability and operator viability
- Strengthen the planning framework at a local level by clarifying the service system management role and including school boards and community partners as key planning collaborators
- Promote consistent quality standards across the province by using established tools
- Guide a much-needed legislative review of the "Day Nurseries Act".

A Vision for Child Care in Toronto

City Council has endorsed the full vision for early learning and care in Ontario set out in the Report, "With Our Best future in Mind: Implementing Early Learning in Ontario". This vision included Full-Day Kindergarten (FDK) with corresponding before- and after-school programs, complemented by services for younger children through a Child and Family Centre model. While FDK will be fully implemented in September 2014, there is no implementation plan for other parts of the vision.

The City of Toronto would like to see a provincial commitment to working with partners to further integrate services, with a view to developing a broader early learning system that improves services for all children and families. Toronto will continue to advocate for a fully integrated and comprehensive early learning system as the best response to child and family needs. Early learning opportunities must be part of a single, cohesive system, supported by a provincial policy framework that aligns child care, FDK, family support and other programs. School boards are key partners and significant providers of early learning and must have their roles and responsibilities incorporated into the policy framework.

The Modernizing Child Care discussion paper is a positive step in beginning to address the needs of the child care system. At the same time, its focus is on how the child care system can be stabilized over the next three years. In the future, following stabilization of the sector, the expansion of the system and the integration of services for children and families must be priorities.

The City agrees that the key areas identified in the paper are the right issues to be addressed if child care in Ontario is to be stabilized. In fact, Toronto City Council has made a number of requests in recent years for the financial and policy resources needed to stabilize and maintain high quality, regulated child care during and following FDK implementation. Previous recommendations and requests are summarized in Appendix A.

Child Care in Toronto

The child care system in Toronto is the second largest in Canada (behind the Province of Quebec). The system includes over 53,000 licensed spaces located in over 900 child care centres, of which more than 600 have a service contract with the City of Toronto to provide child care to families in receipt of fee subsidy. Licensed home child care agencies manage approximately 3,400 spaces in 974 private homes. The 24,000 fee subsidies available in Toronto, however, only allow 28 per cent of families with the lowest incomes to access a child care fee subsidy, and there is a waiting list of over 21,000 for fee subsidy. Thirty-two per cent of children in Toronto live under Statistics Canada's Low-Income Cut-Off (LICO), compared to 19 per cent in the rest of the Greater Toronto Area, making affordability of child care a key issue.

Child care operators in Toronto, as in the rest of the province, are facing challenges as FDK implementation adversely impacts the financial viability of many centres. Recently announced one-time provincial investments will assist service system managers with capital and transitional resources required to transition the service system to one focused on caring for younger children. Additional policy and legislative resources are required to complete the transition and to ensure that the system remains stable and accessible in perpetuity.

Consultation Process and Parent Survey

In preparing this response, the City of Toronto has drawn on the significant expertise available through child care providers, registered early childhood educators, and child care advocates in Toronto.

Seven external consultation sessions were held with 142 participants. External sessions included meetings of District Child Care Advisory Groups and with the committees of the Toronto Child and Family Network (Early Learning and Care, Early Identification and Intervention, Family Support, Health, and Aboriginal and French-Language groups). An additional six sessions were held with Toronto Children's Services front-line and management staff, which were attended by 112 people and an additional 68 responses were received from municipal staff in directly operated child care centres. Findings from these discussions informed recommendations included in this submission.

Finally, Children's Services promoted an online survey that asked for parent input in key areas of interest. Responses were received from 352 parents, 90 per cent of which were from parents currently using child care. Parents identified a number of care arrangements that they used either currently or in the past, including before- and after-school programs, private nannies, parent co-ops, centre and home-based care, and the use of family members. In looking for child care, 82 per cent of respondents indicated that the cost of care was too high and 77 per cent indicated that the waiting list for a child care space was too long. Seventy-one per cent of respondents were aware of Toronto's quality ratings and 63 per cent had used them in looking for quality child care.

When asked for their thoughts on what would help parents find quality child care, a majority of parents indicated that they could use more information as many of the respondents relied on word of mouth to find care. Suggestions included information boards in hospitals, schools, and community centres, as well as lists of all the programs that are available and how to apply for them. Parents agreed that quality ratings should be publicly available.

Asked for suggestions that would improve the overall quality of child care, parents strongly responded that the cost of child care is unaffordable and that the lack of access to space and subsidies in Toronto are major barriers that are causing problems. Many parents had stories of long periods of time spent on waiting lists, and of struggling to pay the cost of care. With respect to costs, many parents recognized that child care operators are not sufficiently funded to provide affordable care. In terms of program quality, many parents clearly valued the staff in their child care centres and suggested that staff could be better paid and provided with more training opportunities in order to improve the quality of programs. Higher staff to child ratios were also preferred by some parents.

Findings from the consultation process have informed this submission. Parents' desires for information on all the programs available could be addressed by better co-ordination of all the early learning opportunities that exist. Parents' concerns with respect to affordability and access to spaces are important issues that require additional resources. However, these can also begin to be addressed by a base funding model and clearer capital planning roles as recommended in the body of this submission. Parental awareness and use of quality ratings confirms that the Toronto Operating Criteria is a useful tool that might be valued by parents in the rest of the province. A recommendation to this effect is also included. Finally, the City of Toronto agrees that training opportunities and requirements for registered early childhood educators should be formalized and improved.

SERVICE SYSTEM ROLE

Recommendations

- Clearly endorse the Consolidated Municipal Service Manager (CMSM) role as the service system manager, and as the stakeholder that can best balance a system-wide perspective with child care needs at the operational level. Embed this role in policy directives to school boards
- Transfer licensing responsibilities to CMSMs in order to ensure that system growth is planned in a way that addresses equitable access for families. Alternatively, include the approval of CMSMs as a required step in the licensing process.

The City of Toronto Children's Services Division is the Consolidated Municipal Service Manager (CMSM) for child care. In this provincially-mandated capacity, the City ensures that

- Policies, programs and services are planned, coordinated and complementary;
- Access to services is equitable; and
- Resources are effectively invested in a transparent and accountable manner that best addresses community needs.

In addition to service system planning, Toronto's role as CMSM for child care includes managing fee subsidies, service agreements and supports for children with special needs. Priorities and directions in these areas are outlined in the Council-approved Child Care Service Plan 2010-2014, attached as Appendix B

www.toronto.ca/children/pdf/serv_plan_2010/servplan_2010.pdf

Municipalities are also planners and managers of services for children other than child care, including parks and recreation, public health, library and other programs. With a single governance structure and the local authority to drive changes, municipalities are well-positioned to advance the integration of services at the local level. The modernization of child care, FDK, and other early learning opportunities should make full use of the funding, management and planning capacities that municipalities already possess.

Feedback from consultation sessions endorsed the City's role as service system manager for child care in Toronto, and recognized the City's expertise in the planning of child care services and in identifying and addressing needs at the local level. At the same time, creating a cohesive policy framework requires that partnerships with school boards and other community collaborators be maintained and strengthened with roles and responsibilities clearly established. The City regularly engages stakeholders, including the boards of education, in its service planning and implementation activities.

Specifically, the City of Toronto recommends that the CMSM role and accountability structure be embedded throughout all Ministry of Education school board memos and policy directives related to early learning and care. The role of the CMSM in the discussion paper could have been stronger as it relates to system planning, providing information to parents, collecting data, communicating with operators, and quality assurance. In addition, in order to effectively plan the development of the child care system at the local level, it is recommended that CMSMs be transferred control of child care licensing. Alternatively, the approval from CMSMs could be included as a required step in the licensing process, as is the case with other municipal departments (Planning, Building, Public Health) to ensure that growth in the system is directed to address access.

The Ministry of Education's priority should be on building CMSM capacity where it is needed. The recommendations contained in this response would strengthen the City's (and other CMSMs') ability to manage the child care system within provincial guidelines in a locally responsive way.

CMSMs also ensure that the needs of Aboriginal and Francophone communities are taken into account when planning services. These communities are recognized as unique in Toronto and as such dedicated committees have been established to seek advice on planning for their unique needs. Toronto encourages ongoing commitments to both of these communities.

KEY AREAS OF THE DISCUSSION PAPER

Operating Funding Formula

Recommendations

- Index provincial transfers to service system managers to relieve inflationary pressures
- Develop a more transparent, simple and flexible funding formula based on a provincial framework of principles, standards and strategic goals for the child care system that allows more local flexibility in achieving standards and goals
- The funding formula should have two allocations:
 - Operating funds for base funding, fee subsidies, and special needs resourcing
 - Capital
- On an interim basis, provide block funding that allows CMSMs to address local pressures, with child care service system goals negotiated yearly between the province and service system managers
- Annualize one-time funding allocations announced in 2012 to allow stabilization of the system over time. Ongoing, systemic issues cannot be addressed with one-time funding
- Develop funding formulas based on demographic factors such as the number of children living below LICO, the number of families with young children in the labour force, population growth, etc.
- Include in the funding formula flexibility in the funding to Aboriginal communities in order to address cultural needs and increase the participation rates in licensed child care.

Currently, child care operators in Ontario receive operating funding in a number of forms, including fee subsidy, wage subsidy, and special needs resourcing. Revenues are also received from parent fees.

The discussion paper asks what elements should be considered when developing a new funding formula. Operating funding should be allocated according to provincially-developed principles, standards and strategic goals that allow service system managers to customize funding in a way that best addresses local needs. Every CMSM has unique needs to accommodate. The formula used to allocate funds should be public, transparent and equitable, taking into account demographic factors in addition to child population, such as the number of children living below LICO, the number of parents in the labour force with young children, other population trends and cost of living increases. Other parts of the province have no wait list for fee subsidy, while Toronto's wait list continues to grow. The Province should look at the demonstrated needs across service system managers and allocate funding based on these demographic factors and other unique needs.

The unique demographics of Toronto have resulted in a significant waiting list for fee subsidy. At the same time, the affordability of quality, licensed child care is a challenge for many families. The City of Toronto has heard that it is important to address affordability for all families, including families who pay the full child care fee. Many families who earn average

incomes struggle with the cost of care. Eighty-two per cent of respondents to the parent survey indicated that the cost of quality child care was too high.

To address these challenges, Children's Services commissioned a 2011 report on child care funding, titled "Early Childhood Education and Care in Toronto: Funding the Future", which included recommendations that

- As an urgent priority, provincial transfers to municipalities be indexed;
- Child care funding be reviewed in light of the implications of FDK on the viability and sustainability of child care services, and adjusted to reflect the anticipated fee increases
- More autonomy should be assumed by the City of Toronto in managing the multiple child care funding stream to tailor available funds to meet the needs identified in its service plan.

CMSMs need the flexibility to develop funding mechanisms to address affordability. Fee subsidies are no longer an adequate means of addressing the affordability of the child care system. Toronto recommends a transparent, simple, and flexible funding model comprised of operating and capital allocations. Operating funds should be available for base funding, fee subsidies, and special needs resourcing, with capital funds available for construction, health and safety and other capital projects.

A base funding model that addresses affordability for families and sustainability for operators is needed. Such a model would help families who do not qualify for fee subsidy and, at the same time, address inequities in the cost structures and funding available to different providers. For example, rental costs vary across the system (occupancy costs are paid on behalf of some operators based in schools), and wage subsidy is inequitably allocated due to the limited resources available. Base funding would create a level playing field for all operators if funding were allocated based on fixed costs. Of course, even in a base funding model, some families will continue to require fee subsidies. As poverty levels increase, so should the availability of fee subsidies.

A number of areas in the child care system are thought to be underfunded, including staff salaries, special needs resourcing and professional development opportunities. Base funding could begin to address these issues. Special needs resourcing in particular is in need of readjustment under a new funding formula. We know that 10-12 per cent of children are in need of support; funding formula adjustments should reflect this need. Base funding could also streamline reporting requirements, making operations for service system managers more efficient, another consideration raised by the discussion paper.

On an interim basis, while a new funding model is being developed, it is recommended that the province provide block funding to service system managers. Interim block funding and child care system goals should be negotiated yearly between the Province and local service system managers based on agreed upon objectives and outcomes. As different areas have different priorities, these goals could differ across the province. For example, communities might require flexible resources for fee subsidies, to improve quality, or for Aboriginal programs. This interim measure would provide some flexibility to service system managers while work on the

development of a new funding model is being completed. The effectiveness of this measure would require some program guidelines (e.g. wage subsidy) to be suspended.

Lastly, regardless of the funding formula, provincial funding must be indexed to inflation. Children's Services' base funding pressures are increasing by up to \$8 million per year as the cost of providing services rises. Currently, the shortfall is made up through contributions from the Child Care Expansion Reserve Fund. This fund, however, will be depleted without additional resources, resulting in a loss of more than 2,000 subsidies that are currently fully funded by the City. At the same time, the one-time funding allocations announced in 2012 need to be annualized if the system is to be stabilized. Ongoing systemic issues in child care cannot be rectified with one-time funding.

Capital Funding Priorities

Recommendations

- Recognize child care as a valued, core part of the school program so that early learning opportunities are part of a single, cohesive system
- Establish, through clear guidelines and expectations, a lead planning role for CMSMs for capital dollars flowing through school boards. CMSMs, through their child care service plans, should lead a joint planning process to ensure an equitable system that maximizes limited resources and includes school-based and community-based child care
- Protect capital investments in schools by guaranteeing security of tenure and moving away from a landlord-tenant model
- Give equal importance to community- and school-based child care spaces in recognition of high-need areas and lack of space in schools
- Permit only one child care operator in each school. A single operator in a school creates a more efficient and less fragmented system while freeing up resources for the subsidy system.

The recent release of the Schools-First Child Care Capital Retrofit Policy is an important step as it provides school boards with capital dollars to fund child care retrofits in schools. Child care in schools is helpful to many families as it reduces transitions for children and can be more convenient for parents. Schools can also be important community hubs, with child care spaces as an important component of services needed by families. For these reasons, Toronto is recommending a revised school capital policy that would provide financial assistance to school-based child care operators. The current policy direction has created some concerns among operators related to security of tenure for school-based child care, the ongoing need for community-based child care spaces, and how capital investment in these services will be planned to ensure equitable access to care.

The discussion paper asks what supporting policies are required to ensure the success of a schools-first child care policy. One of the most consistent messages heard through the consultation process was that child care centers in schools need security of tenure. Operators are concerned that without a formal commitment from school boards they will continue to operate under uncertain conditions. Clearly, security of tenure is more important as significant

capital investments are made. Child care must be recognized as a valued and core part of the school program. A single, cohesive early learning system should mean that child care centres do not pay rent for space in schools – taxes already cover this space. A partnership rather than a tenant-landlord relationship is needed. The Ministry of Education should lead this necessary shift in boards of education and at the individual school level. As a first step, the Ministry of Education could require that school officials participate in the governance of their child care centres, for example, by having principals sit on the board of directors of non-profit centres located in their schools as non-voting members. In addition, only one child care operator should be permitted in each school. A single operator makes administration more efficient and is closer to the ideal of seamless, integrated services.

It is important in Toronto, where there is a large number of vulnerable neighbourhoods and limited space in schools, that the role of community-based (outside of school) child care centres be maintained. Toronto families will always have a need for community-based care, and these spaces are important to many communities (for example, child care located in Toronto Community Housing locations provides valuable support to children and parents who may be struggling with financial or other issues). Community-based child care programs can collaborate with other agencies to offer more effective services and contribute to community cohesiveness.

Many schools in Toronto have limited space, so there is limited opportunity for expansion, especially since the Schools-First Child Care Capital Retrofit Policy does not permit expansion of the gross floor area of a school. Further, schools are not always in a convenient location for families, especially those with children not of school age. Parents often choose to access care based on immediate availability or proximity to work and not necessarily at the school. Lastly, many schools have closed enrolment. When children use child care that is outside of their home school district, they are unable to enrol in that school, creating a disruption in the family's child care plan. Child care in schools is the preferred option in a system that is fully funded and universal. In the absence of such a system, school-based spaces cannot work for all families.

Capital development both in and out of schools must follow local service planning principles. It must be recognized that CMSMs are able to take a system-wide view of the child care system that includes child care spaces in all school boards as well as in the community. While school boards may act as the flow-through for capital dollars, the planning approach developed in CMSM child care service plans will enable the development of an equitable and comprehensive capital investment plan that addresses local needs. CMSMs are also the party best able to ensure that capital development is informed by the availability and allocation of fee subsidies.

The new child care spaces created under Best Start provide a good illustration of the importance of service planning. Spaces under the program that were created in accordance with the Child Care Service Plan remain successful, while many others have closed. Effective capital development in schools can also be hindered by the Accommodation Review Committee (ARC) process. When child care is situated in schools, decisions regarding the future of schools must take into account the interests of the children and parents who use the child care and the impact of any decision on the child care system and municipal child care service plans.

Quality Programs

Recommendations

- Province-wide quality assurance guidelines should be in place. The City of Toronto's Operating Criteria, as a reliable and validated tool, could be the base for such a program. The application of the tool and reporting of results should remain a CMSM responsibility
- Explore mandatory early identification tools in child care settings
- Promote ELECT as a consistent curriculum guide across the province
- Allow programming, planning and professional development time for Registered Early Childhood Educators as a necessary input to high-quality programs.

Quality in child care has long been a priority for child care operators in Toronto. As the province looks to develop mandatory provincial program guidelines, it is encouraged to look to the practices already in use in Toronto.

The City of Toronto's quality assurance tool (Toronto's Operating Criteria) has been endorsed as a valid and reliable measure of quality in preschool child care settings and is currently being validated for infant and toddler age groups. It has also been found to be cost-efficient to administer, costing only five cents per day, per space. In fact, parts of the City of Toronto's quality assurance system are already being adopted in other Ontario jurisdictions such as Peel and Thunder Bay. Interest has also been received from jurisdictions outside of Ontario.

In response to the discussion paper question about what resources on program quality the government could develop, the Province is encouraged to work with Toronto to incorporate the Operating Criteria into a province-wide quality standard. The Criteria could contribute to better outcomes for children across Ontario. CMSMs would administer the quality assurance process within provincial guidelines. Assessments form only one part of a strategy to build capacity. Municipal staff follow up with programs to provide advice on how to meet the various quality requirements which, in Toronto, include criteria for all age groups, playgrounds, nutrition, administration, and financial management. Assessments inform training needs and help establish best practices. Scores related to a child care centre's activities, learning, health, safety, adult/child interactions and nutrition are posted online as a resource for parents and incentive for operators to improve.

In addition to the Operating Criteria, other quality improvement initiatives are being moved forward in Toronto. Early Learning for Every Child Today (ELECT) is a quality framework being promoted in child care and broader early learning programs through the Toronto Child and Family Network. With respect to the discussion paper question about how provincial program guidelines can support program quality, with the development of ELECT as a province-wide framework, there is no need to create a new one. Participants in the consultation sessions supported ELECT as a valuable resource that programs can use to improve quality, but also advised that resources are needed to achieve higher levels of quality. For example, following the model in place for kindergarten teachers, Registered Early Childhood Educators need planning and professional development time to effectively administer high quality programming. There is a stated need for ongoing and accessible

training and professional development opportunities in French. Program quality and consistency between school and child care settings could also benefit from ongoing joint training opportunities for teachers and Registered Early Childhood Educators.

The Quality Programs section of the discussion paper also mentions reviewing elements of the special needs resourcing program. Many operators indicated that it is becoming increasingly difficult under the existing funding model to provide sufficient care to all children with special needs. Operators of both child care centres and home child care programs have identified that more resources are needed to support the unique needs of children with special needs, and that these resources are vital to maintaining quality programs.

As child care increasingly focuses on serving younger children, this is a good time to introduce mandatory early identification tools in child care. Toronto will continue to support a broad definition of special needs and provide support to a wide range of children. A review of Children's Services' Every Child Belongs policy is currently being conducted to reassess how the service is working, what the gaps are, how they can be met, and how the policy should be amended. Findings from this review could be used to inform special needs resourcing models across the province.

Modernized Legislative and Regulatory Framework

Recommendations

- Review the Day Nurseries Act and apply research and best practices for a modernized Act that better aligns child care with Full-Day Kindergarten, streamlines regulatory requirements, and supports the transition to serving younger children
- Work with municipalities and school boards to ensure provision of a nutritious lunch to kindergarten students attending before- and after-school programs
- Strengthen the Family Support sector's ability to engage informal care providers, and recognize that the licensed sector needs to be expanded to meet the needs of families
- Develop age-appropriate licensing requirements for high-quality, out of school time programs for six-12 year olds based on research and best practice
- Provide policy and funding support for the continued development of the Best Start Child and Family Centre concept as part of a policy framework that creates a single system of early learning opportunities
- Rationalize child care responsibilities across provincial ministries (i.e. for child care, Ontario Early Years Centres, Child and Family Centres, and other programs).

There is broad consensus that the "Day Nurseries Act" (DNA) is out of date. The legislation is based on old realities and research - even the reference to day nurseries alludes to a medical model of care that no longer exists. Child care operators and system managers are also required to abide by rules contained in several disparate pieces of legislation, making child care governance difficult to understand. Clearly, the DNA does not adequately address the needs of the emerging early learning system in Ontario. For these reasons, a legislative review is necessary and we commend the Province for initiating discussions.

The goals of this review should be to align child care with FDK and facilitate the shift to serving younger children, normalize interpretations of certain parts of the DNA across the province, and streamline policy and procedure requirements. Toronto Children's Services has previously recommended DNA amendments that would address these goals. Above all, legislative changes must be based on evidence and best practices and consider other influences on families' need for care, such as the length of parental leaves (which impacts the amount of time infant rooms are used).

Aligning FDK with child care means creating a system of services where children can access the same resources and learn under the same environment, regardless of whether they are in the core school day program or in before- and after-school care. A provincial framework should address the existing siloed approach to early learning in Ontario. For example, children should be able to use the same playground and classroom regardless of which program they are attending. Similarly, supervision practices should be consistent across programs. These programs should not require additional licensing processes—obtaining licenses for existing space for before- and after-school programs has been onerous for operators and seems unnecessary as the space is deemed appropriate for children during the school day. This amendment would help the government to reduce duplication and inconsistency in requirements, an objective raised in the discussion paper question.

For the younger children remaining in child care, age group ranges and sizes should be reviewed to ensure both quality and financial viability. Some flexibility should be included to help operators meet operational needs. Specifically for home child care, DNA changes could include allowing providers to take more than five children if they are all above 3.8 years and only need before- and after-school care.

Changes to group sizes have a direct impact on how capital dollars are spent. New capital dollars are being spent according to the current, outdated play space provisions of the DNA. The earlier DNA changes are made with respect to capital requirements, the better capital money can be used in the future.

The discussion paper specifically asks whether a new licensing category is needed for older children. Toronto's position is that for older children (aged six to 12) a new regulatory environment is needed. Specifically, a broader range of age-appropriate programs is seen as a requirement for this age group. A system that meets the needs of six to 12 year olds will depend on a regulatory environment that allows appropriate models to be set up. As such, requirements for school age children should be established in legislation separate from the DNA. A number of community partners in Toronto are currently working on a Middle Childhood Strategy that would develop a comprehensive system of high quality out-of-school-time programs for children six to 12 years that includes a wide range of services, providers and interests that exist across the city. The strategy will be evidence-based and reflect community consultation findings, and could be used to inform the development of a new regulatory framework for the age group. It is clear that the strategy will rely heavily on school board participation and access to school space. As such, school boards must be full partners in planning for this age group. Other items, such as lunch provision for FDK children, also need to be addressed as changes happen in both child care and school programming.

The child care system is transitioning as a result of FDK to meet the needs of younger children, with a corresponding increase in the cost of care by upwards of 10 per cent. Efficiencies must be found within the system to help maintain affordability for those families not eligible for child care fee subsidies.

Guidelines governing the provision of before and after school care for those in FDK allow before- and after-school program operators to include the cost of a bagged lunch in their per diems, but children are intended to be the responsibility of the school and the board during the school day, which includes the lunch period. This is the type of policy issue that is forgotten without clearly defined roles. As a result, kindergarten aged students do not receive a hot lunch while older age groups continue to be supplied with one through their child care program. Instead the younger children are receiving five snacks per day; these resources should be rationalized to include a lunch.

Public entities should work together to find solutions to these issues as good nutrition is critical to children's learning. Over the next two years, it is recommended that the Ministry of Education, CMSMs and school boards work together to ensure that a financial structure is in place to support proper nutrition for children of all ages. On an interim basis, the City is considering providing grants to support the costs of bagged lunches, to allow time for a permanent solution to be found.

With respect to the discussion paper question on how the government can foster quality in informal home-based child care, it is important that the informal/unlicensed sector not be promoted. Informal care exists primarily because the licensed system is under resourced. Respondents to the parent survey strongly indicated (77 per cent) that there is a long waiting list to get a child care space. While it is important to stabilize the existing child care system, the expansion of spaces and subsidies will need to be addressed in the future given the small number of children currently being served. Toronto's preference continues to be for licensed, high quality care.

The discussion paper proposal to create a registry of informal/unregulated caregivers could cause confusion for parents who might believe such caregivers have been endorsed by the government. Instead of approaching this issue through the child care system, Family Support programs currently provide this function. Family Support programs have experience engaging and providing advice to informal caregivers, and they form part of the integrated child care system. However, the success of these programs will require inter-ministerial cooperation, as Family Support programming remains under the Ministry of Children and Youth Services.

Implementation of the City of Toronto's quality assessment tool, as discussed in the previous section, could result in significant efficiencies in the child care system, including fewer licensing visits. Quality assessments and supports can augment licensing and promote quality environments for all children in Ontario. In this scenario, the emphasis shifts from annual policy and procedure reviews to recognizing core requirements and focusing on staff-child interactions and quality play-based environments for children.

Community partners in Toronto are also working to further the Best Start Child and Family Centre concept. With three sites of practice in Toronto, and the City having been recognized

as a Community Integration Leader by the Ministry of Children and Youth Services, this important work will continue. The further development of this concept is essential to ensure that families have the services they need, including potentially providing greater access to Family Support programs by informal caregivers. Better integration of the early learning sector may require that the responsibility for disparate programs (such as Ontario Early Years Centres; parenting supports; data analysis functions, and others) be transferred to the Ministry of Education and managed by service system managers. Funding should come to municipalities through a consolidated funding envelope.

The Province is also encouraged to consider how other provincial policy and program changes affect the child care system. For example, the Ministry of Community and Social Services/Ministry of Children and Youth Services has made a policy change related to the mandate of child protection agencies to help children avoid foster care and maintain family unification. The change has led to an increased number of requests for priority access to the subsidized child care system, placing additional pressure on the system in Toronto. This results in funding not being allocated to families who have been waiting on the first-come first-served waiting list. Options for alleviating this pressure on the child care system needs to be addressed.

Support for Accountability and Capacity-Building

Recommendations:

- Recognize and build on the extensive data available at the municipal level.
- Consolidate data collection functions that are currently housed outside of the City (i.e. Data Analysis Coordinators) to strengthen local data collection and decision-making. These resources should be used to build CMSM capacity where it is needed.
- Provide an Aboriginal data collection strategy.
- Mandate the school board role in local networks, such as the Toronto Child and Family Network, to promote planning and capacity-building processes that include boards, CMSMs, and the broader community. School board representation should involve senior board leaders.

The City of Toronto has a sophisticated information management system that informs resource allocation, ensures accountability and advances quality. Several accountability tools and processes are already in place at the local level. All of these are functions that require local data collection and analysis.

Toronto Children's Services works closely with other City divisions to share and analyze trends and display data. Local data collection should be strengthened by the consolidation of data collection functions within municipalities, including Data Analysis Coordinators (DACs) that are currently housed outside of the City. While DACs are valuable and a number of organizations would like to increase their data analysis capacity, it is preferable for this function to be with service system managers than housed with a single operator. Municipal staff already have local knowledge of services, and better data could help further the development of the Toronto Child and Family Outcomes Framework, which will help programs achieve agreed-on

outcomes. Transferring the DACs would also enable other CMSMs to build their capacity for gathering and assessing data.

With respect to data collection and questions about what information should be collected, there is a clear need for more and better data on Aboriginal children and families. Census data has proven to be inadequate, meaning that challenges exist in planning services for these families. A province-wide strategy and understanding of data requirements and collection methods should be developed.

Capacity-building activities include improving coordination among all the sectors involved in providing services to children and families through the Toronto Child and Family Network, and partnering with colleges to provide training opportunities. The Child and Family Network brings together leaders from government and the community to enhance community engagement, organize and integrate services, improve outcomes and align policies and programs. The province should continue to recognize local planning networks that include the CMSM, school boards, and other community partners.

FINAL COMMENTS

In conclusion, the City of Toronto thanks the Province for the chance to contribute to the important work of modernizing child care. There are a number of actions the Ministry of Education can take to modernize child care services in Ontario.

First and foremost, there is a need for a cohesive policy framework that includes all of the early learning opportunities available to children in the province. CMSMs, school boards, and community partners currently form a fragmented system that is cumbersome to administer and difficult to navigate. Provincial leadership is needed to mandate that all of these partners work together in the planning and delivery of various services. A commitment to and clear articulation of the roles and responsibilities of the various parties involved in funding and planning child care – provincial ministries, municipalities and school boards – is needed. Coordinated service planning must be led by CMSMs so that both school-and community-based child care spaces are properly planned from the perspective of the entire system. A new funding formula should sustain this role by allowing CMSMs across the province to address needs in a locally responsive way – within a provincial framework that sets strategic goals and directions.

These roles and responsibilities must be supported by a legislative and regulatory framework that reduces duplication, provides flexibility to operators, rationalizes and decreases differences in different program areas, and allows for new program models where needed (i.e. for six-12 year olds).

Finally, there is an ongoing need for additional resources in child care. The majority of children have no access to high quality care, and affordability and sustainability issues remain key challenges in the sector. The City would like to reiterate the need for federal funding in child care and would like more transparency regarding the provincial use of the Canada Social Transfer (CST), which is a federal block transfer program that can be used for a number of

social programs, including early childhood development, learning and care. The provincial government is encouraged to use its flexibility under the program to make full use of the amount of the transfer that is available for early child development, learning and care. The Province is also encouraged to report on the portion of the CST that is used annually for this purpose. At the same time, indexation of provincial contributions is essential just to maintain the system as it currently exists. Future priorities must respond to the ongoing need for more early learning opportunities in a variety of settings.