

June 13, 2023

Toronto City Council
100 Bay Street, Toronto, ON

Re: EC 4.3 Update on Canada-Wide Early Learning and Child Care Agreement Implementation in Toronto

Dear Deputy Mayor and Council:

We are writing today to share our perspective on the implementation of the Canada-Wide Early Learning and Child Care (CWELCC) agreement and report EC 4.3. Our organizations have been actively engaged with the delivery, development and advocacy for early learning and child care and its workforce for many years in Toronto and across the province.

We want to commend Toronto City Council and Children's Services staff for their continued leadership in the delivery and management of early learning and child care, and for your advocacy to other levels of government on behalf of Toronto's children and families.

The staff report provides an excellent analysis of the benefits and challenges of the CWELCC program implementation, and reaffirms the City of Toronto's commitment to the Toronto Growth Strategy. The Economic and Community Development Committee's recommendations strengthened the call to both the provincial and federal governments to make critical improvements and investments.

We would like to provide some additional comments, and highlight additional changes we believe are essential for Toronto to ensure a qualified workforce, expand high-quality programs and provide equitable access for all families across Toronto.

The Workforce Crisis

As the report notes, many child care centres in Toronto are unable to attract and retain qualified staff, and are unlikely to operate at their current licensed capacity or expand, unless the staff shortage is addressed. The solutions must start with decent work and pay. ECEs and child care workers need significant improvements in wages, comprehensive benefits and better working conditions.

We support recommendation 3, which calls for enhanced provincial funding to support sustained increases to wages and benefits for all staff in the early years and child care sector.

However, we believe compensation improvements in the community sector must be comprehensive (including wages, benefit plans and pensions) and achieve equity with their public sector comparators - municipalities. (The Chair indicated at the Committee meeting that an additional amendment that would capture this concept would be developed and brought forward to Council.)

Equitable Access for Priority Groups will Require More Fee Subsidies

We agree with the proposed priority expansion plan that will support growth in all wards, and give priority for expansion for underserved communities. As the report notes, 77% of Toronto's subsidy families pay less than \$10 per day. Without additional fee subsidies, and changes to the income test and eligibility, low income and families in priority communities will be shut out of the new system.

We support recommendation 2. However, it is critical that it be amended to add expansion of fee subsidies, along with changes to income thresholds and eligibility criteria. Additional fee subsidies, in addition to the growth of licensed spaces, are essential to ensure equitable access for all Toronto families.

Child Care Growth and For-Profit Expansion

The new Provincial Growth Targets for Toronto will require an additional 12,000 spaces be created, beyond the 1,600 spaces already included in the City's 10-year capital plan. The province has established a capital start-up grant program; however, there has been no commitment to provide major capital funding to support renovations, retrofits and new builds.

The province is now opening the door to licensees who chose not to opt-in to the CWELCC program in 2022. They will be included in Toronto's new space count, but do not need to be aligned with the Access and Inclusion plan. Recent provincial guidelines indicated that 66% of applicants for licenses in the pipeline for 2022 were from the for-profit sector. We have tremendous concern that for-profit operators and large corporate chains will compromise the quality, public accountability and future stability of our child care system.

The federal provincial agreement calls for new spaces to be predominantly in the non-profit and public sector. If Toronto is to ensure that it maintains or increases its share of not-for-profit and public sector spaces, there must be major capital funding to support this growth.

We support recommendation 6 with small but significant amendment to replace "in the not for profit and publicly-funded sector" with "in the not-for-profit and public sector."

We support all the other recommendations in the report, and encourage Council to adopt these.

We want to, again, thank the City for its leadership on early learning and child care. We look forward to working with you in the development of the Access and Equity plan, and the provincial Funding Formula changes that we believe must be amended to recognize and support the funding levels and costs in Toronto.

Toronto has long been a child care leader and we look forward to working with all of you to make affordable, quality child care a reality for all Toronto families.

Kind regards,

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