



January 17, 2019

Hon. Todd Smith
Minister of Economic Development, Job Creation and Trade
777 Bay St., 18th Floor
Toronto, Ontario
M7A 1S5

CC: Hon. Lisa Thompson, Shannon Fuller

Re: Bill 66, Restoring Ontario's Competitiveness Act, 2018

Dear Minister Smith,

Established in 1950, the Ontario Municipal Social Services Association (OMSSA) is a non-profit association whose members are the Consolidated Municipal Service Managers (CMSMs) and District Social Services Administration Boards (DSSABs) across Ontario. Our members' interests are represented to OMSSA by the senior human services staff of the CMSMs and DSSABs. Service System Managers play a central role in the planning, funding, administration and operation of early years and licensed child care services in Ontario.

Bill 66, *Restoring Ontario's Competitiveness Act, 2018* proposes significant changes to the *Child Care and Early Years Act, 2014*. OMSSA recognizes and appreciates the Province's intention to increase access to child care and supports many of the recommended changes.

The change to allow authorized recreation providers to serve four and five-year-olds helps to align the age requirements for all program types providing before and/or after school programs. In many cases, authorized recreation providers rely on external funding sources to provide affordable fees in many cases. A key source of this funding is the Ministry of Culture, Tourism and Sport through the Ontario After School Program. Our hope is that this Ministry will support these programs in expanding to serve four and five-year-olds, in part through the maintenance and expansion of this program. Without additional resources, the ability of these organizations to open up space for four and five-year-olds is expected to be limited and the access that we are all hoping for will not be realized.

While Bill 66 contains some positive changes in early years and child care, there are very serious concerns around children's safety and quality of child care. This is especially true with respect to unlicensed and informal child care, where oversight and standards do not exist.



Service system managers have a duty and responsibility to express concerns when there is a potential for children to be at risk. Specific changes OMSSA is concerned with in Bill 66 include:

“Currently sub-subparagraph 1 iv A of subsection 6 (3) of the Child Care and Early Years Act, 2014 provides that the group of children in the care of one home child care provider may not include more than two children who are younger than two years old. This sub-subparagraph is amended to increase the number to three children who are younger than two years old.

Currently, sub-subparagraph 1 iv B of subsection 6 (3) of the Child Care and Early Years Act, 2014 provides that the group of children in the care of two home child care providers may not include more than four children who are younger than two years old. This sub-subparagraph is amended to increase the number to six children who are younger than two years old.

Currently, subparagraph 2 iii of subsection 6 (3) of the Child Care and Early Years Act, 2014 provides that the group of children in the care of an unlicensed child care provider may not include more than two children who are younger than two years old. This subparagraph is amended to increase the number to three children who are younger than two years old.”

Increasing the limit on the number of children under two years of age makes supervision more difficult, particularly in emergency situations, raising serious concerns among our membership. OMSSA strongly supports licensed child care and the oversight and accountability it provides to protect children’s safety. OMSSA does not support the proposed reform for unlicensed child care providers, as they are not subject to the same oversight and accountability. As a result, this change has the potential to put many children in unlicensed child care at risk.

OMSSA believes efforts should be made to encourage unlicensed child care providers to become part of the licensed system. The implementation of a new child care tax credit, as proposed prior to the election and during the provincial election campaign, is likely to have the opposite effect of the current subsidy-based system, and therefore lead to the expansion of unlicensed child care. OMSSA and its members are concerned that this will lead to more serious and even fatal incidents, with an extremely limited ability to track, monitor or assess these new risks, due to a lack of oversight on the unlicensed child care sector.

Taken together, these two changes (incentivizing the expansion of unlicensed child care, and increasing the number of very young children allowed under each provider’s care) will create a system that many families will be hesitant to trust or to use. OMSSA would be pleased to



work with the Province on ways to encourage unlicensed providers to become part of the licensed system. This could be accomplished by maintaining existing ratios for unlicensed child care providers and removing unnecessary barriers to becoming licensed or maintaining a license, encouraging more providers to participate in the licensed system.

In summary, OMSSA agrees on the need to increase access by creating new cost-effective licensed child care spaces, but feels strongly that increased access cannot be achieved at the expense of children's safety and quality of care. The health and safety of our youngest most vulnerable children must be the top concern in any decision related to early years and child care.

OMSSA expects that the Province will release its new child care plan following the release of its 2019 Budget. OMSSA and its members stand ready to work with the Province and to continue to play an important role within Ontario's early years and child care system. We will be submitting recommendations related to Ontario's child care and early years system following our Children's Services Summit on January 23-24.

OMSSA encourages the Province to reconsider the proposed changes specific to early years and child care within Bill 66, and consider these instead within the development of its new child care plan. This will provide an important opportunity to consider these changes as part of a wider review of the early years and child care system. Local flexibility is also important to address the unique circumstances in rural, urban, suburban and Northern communities.

OMSSA has enjoyed a strong relationship with the Ministry of Education on early years and child care and looks forward to building on that relationship in the future. Our members look forward to consulting on the new child care plan and working together on shared priorities of quality, access, choice, safety and reducing administrative burdens within the early years and child care sector.

Sincerely,

Doug Ball

Executive Director

Ontario Municipal Social Services Association (OMSSA)