



**Manitoba Child Care
Association**

Budget Consultations 2014



Recommendations for Early Learning And Child Care

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Summary of Priority Recommendations for Early Learning and Child Care Provincial Budget 2014 – 2015

1. Continue to move early learning and child care forward by keeping and building on all the initiatives already in place.
2. Develop a shared vision and a provincial framework for early child development to guide action by government, NGOs, individuals, and families.
3. Commit to a re-design of the child care system over the next 5 years, to ensure an equal partnership with education, where ECEs are included as equal partners, and benchmarks identified and monitored.
4. MCCAs most current Market Competitive Salary Guideline Scale for Early Learning and child Care Centres should be the minimum salary range for full and part time ECEs and CCAs and new annual funding must enable salaries to be indexed annually.
5. An ECE Recruitment and Retention Committee be established to do research into workforce challenges, gaps, needs and develop an action plan.
6. Update Manitoba's competency standards for ECE's, administrators, and family child care providers.
7. Review classifications, increase entry level training to 60 hours, and add degree programs in ECE.
8. Require ongoing professional development of all practitioners, allow 3 paid in-service days annually, and provide a professional development learning support grant.
9. License and fund more full and part time child care centre spaces as ECEs are available.
10. Provide provincial leadership to ensure communication, collaboration, and consistency between child care and schools.
11. Index subsidy levels annually.
12. Introduce a consumer protection and education strategy to assist parents choose quality child care.
13. Provide an annual funding increase that reflects increases to operating costs, inclusive of new expenses introduced by the province, and enables all facilities to pay market competitive wages, and does not unduly burden volunteers with fundraising.
14. Identify a strategy to assist facilities with higher than affordable operating costs due to, for example, fixed expenses such as rent.
15. Regulate the maximum fee child care centres must charge.

16. Provide resource, training, guidance, and support to board members.
17. Return Child Care Coordinators to work directly under the MELCC Policy and Planning Branch.
18. Ensure decisions made by Manitoba Education and/or provincial school boards that intersect or overlap with child care are made in partnership with Family Services and direct service providers.
19. The recommendations made by the Office of the Auditor General must be addressed promptly, and efforts made to improve transparency, public reporting, data collection, communication, information sharing, pre-planning, stronger licensing, and compliance with regulation.

The Manitoba Child Care Association

The Manitoba Child Care Association (MCCA) is a non-profit, membership funded organization established in 1974. Our mission is to advocate for a quality system of child care, to advance early childhood education as a profession, and to provide services to our members. We are the voluntary professional association for the childcare workforce in Manitoba.

Our 3,900 members share the goal of providing high quality early learning programs in safe, nurturing, and stimulating environments that foster child development and include support to families.

MCCA is an active partner in the development of early learning and child care services in Manitoba. We believe ongoing communication and dialogue are important to help the Government of Manitoba meet their goals, set priorities, plan for the future, and make decisions. We know the information we provide can help policy makers strengthen the programs and initiatives already in place and set a strong foundation for the future.

Building on Progress to Date

There has been substantial growth, many positive enhancements and new initiatives to stabilize and strengthen the early learning and child care system in Manitoba. Great strides were made during the first Five Year Plan for Child Care, 2002 – 2007, and development of new services continued through Family Choices, Manitoba's Five-Year Agenda for Early Learning and Child Care, 2008-2013. The practice of developing long range plans, which include specific objectives and timelines, has worked well for child care in Manitoba. It is a process MCCA encourages be continued in the future. The policy recommendations from MCCA, as the voice of the child care community in Manitoba, as well as the Child Care Regulatory Review Committee, advisory group to the Minister of Family Services and Labour must be considered when planning.

The Manitoba Child Care Association recommends that the Government of Manitoba continue to move early learning and child care forward by keeping and building on all the initiatives already in place, as they are essential to support and improve the infrastructure and operations.

There is much more work to be done.

A strong, effective, and progressive early child development strategy for Manitoba will include a shared vision; a provincial framework to guide action by governments, by non-government organizations, individuals, and families; it will focus on all aspects of children's development; promote early intervention; link the range of programs and services that children and families may require. Along with health and family support, early learning and child care is a key component of an early child development strategy.

A Bold Plan for Moving Early Learning and Child Care Forward

Essential components of an effective child care strategy for the future will include plans to:

- modernize early learning and child care
- achieve an available, well compensated, early learning and child care workforce
- ensure province wide accessibility to affordable training and professional learning
- provide accessible, affordable, high quality early learning and child care services
- ensure adequate funding for a high quality early learning and child care system
- build strong governance and skilled administration
- add provincial leadership to ensure collaborative relationships with education

1. Modernize Early Learning and Child Care

Background: As of June 29, 2013 there were 11,415 individual children registered and waiting for an early learning and child care space on the online registry.¹ Clearly, the shortage of spaces is huge and the pace of system development must speed up in order to close the gap between supply and demand.

Parents waiting for child care may not realize that new spaces hinge on the availability of community volunteers that have the time and talent to launch a new child care centre from scratch. Volunteers must seek out a suitable physical space, oversee the licensing process, find funding sources for renovations or capital costs, apply for grants, and oversee the renovations. Capital, start up, and operating funds from the province are not guaranteed, so it is not uncommon that one or more of those volunteers will have to personally guarantee a line of credit at a financial institution. The founders often serve as the first board of directors, and must establish goals, all policies including personnel, wage scales, job descriptions, oversee financial operations, negotiate collective agreements, handle complaints and are responsible for the overall operation of the child care centre.

However well intentioned the volunteers are, it is an enormous undertaking that will consume a significant amount of time and energy until (if) the facility opens and funds are available to hire staff. This method of establishing new child care centres is an antique that must be replaced with a modernized system that removes the burden from community volunteers and more efficiently responds to the service needs of the thousands of parents waiting on the online registry. It is time to entrench early learning and child care within a strong foundation that enables the establishment of a range of timely and responsive services across the province, skilled leadership, strong governance, stable funding, modern legislation, and a trained, well compensated and supported early learning and child care workforce.

¹ Manitoba Early Learning and Child Care, Online Child Care Registry, www.gov.mb.ca

Priority Recommendations to the Government of Manitoba

1.1 Commit to a re-design of the child care system over the next 5 years into one that will successfully establish and provide the volume and range of not for profit, high quality, accessible, and coordinated early learning and child care services parents are waiting for.

1.2 The re-design should lead to a true and equal partnership between the education and child care systems, which includes child care within the learning continuum from birth forward.

1.3 The distinct knowledge, skills, abilities, and contributions of Early Childhood Educators must be included as equal partners.

1.4 Benchmarks for an effective early learning and child care system for the future include²:

- integrated governance and not for profit service delivery
- funding adequate to support program quality and provide reasonable access
- enough programs to meet demand
- quality learning environments supported by curricula, program standards, trained and adequate staff
- accountability by constant quality improvement supported by data collection and the monitoring and reporting of child outcomes

2. An Available and Well Compensated Early Learning and Child Care Workforce

Child care is central to providing support to children and families, enabling parents to contribute to the economy and ensuring the learning, care, and developmental needs of children are met. The child care workforce is critical to the success of these outcomes and to the well-being of a healthy and productive society.² – *CCHRSC Working for Change Report, 2004*

Background: Quality early learning and child care is best provided by consistent, sensitive, responsive, well trained and well compensated educators. There are many rewards for working in child care, but market competitive compensation is still not one of them. Decades of below market compensation has left child care with a solid reputation, deeply entrenched after 40 years of licensing in Manitoba, as a poorly paying sector, vulnerable to changes in government and in the economy.

The shortage of Early Childhood Educators continues, even with training and tuition support programs. In 2013, 19% of centres and nursery schools are not complying with trained staff requirements and another 11% of facilities exempted from the requirement to meet the standards because they had staffing plans in place to help them work toward meeting them.³ In total, 30% of existing licensed child care centres still cannot recruit employees with the qualifications

² Early Years Study 3, 2011

³ Office of the Auditor General – Manitoba, January 2013

required by the Community Child Care Standards Act, exactly 30 years after it was introduced in 1983. Ongoing licensing of new spaces, the possibility of licensing of on-reserve programs, the hiring of ECEs by school divisions and other employers that value the training, high exit rates, and the aging of the existing child care workforce, are all factors that must be considered when developing effective recruitment and retention plans.

Although there has been progress on wages, compensation for most Early Childhood Educators (ECEs) has remained 20-25% below competitive rates.⁴

There has been no report on the findings of the provincial wage consultation conducted by MELCC the fall of 2012, and no action plan announced about the provinces commitment to standardize wages. The development of a provincial wage scale, first recommended by MCCA to the Manitoba Day Care Task Force 1989, has finally been identified as an initiative by Manitoba Early Learning and Child Care. This may, at long last, provide an overdue solution to the recruitment and retention problem and establish confidence that early learning and care is a viable career option.

It is also a risky initiative, and MCCA cautions that introducing a mandatory provincial wage scale that falls below market competitive wages will backfire and generate anger, discouragement, and increase exit rates from the field. The workforce is expecting a wage scale to catch up, not a rollback to a below market average, or to be frozen in place.

Priority recommendations to the Government of Manitoba:

2.1 MCCAs most current Market Competitive Salary Guideline Scale for Early Learning and Child Care Centres should be the minimum salary range for full and part time Early Childhood Educators and Child Care Assistants, along with the definitions and job descriptions for ALL 9 positions and ALL 5 levels of experience. Our scale:

- ✓ Is research based
- ✓ Is made in Manitoba, inclusive of a review of the 1987 Comparative Worth Study (Mansis Development Corporation); Occupational Standards for Child Care Practitioners and Child Care Administrators (Canadian Child Care Federation; Child Care Human Resources Sector Council); Manitoba's Child Care Competency Standards
- ✓ Is competitive with jobs outside of child care that have similar responsibilities and qualifications
- ✓ Is current as of August 2013
- ✓ Provides a logical salary structure that is easy to follow
- ✓ Is established within our industry
- ✓ Is already supported by many Boards of Directors and expected by a majority of the child care workforce

⁴ PeopleFirst HR Services, Recommendations on A Market Competitive Salary Scale for Group Child Care Centres, February, 2007.

2.2 ECEs and CCAs with comparable qualifications, experience, and job responsibilities should receive comparable market compensation regardless of where their child care centre is located in Manitoba, the number of licensed spaces, the ages of children served, or the occupancy costs paid by their employer.

2.3 In order to retain ECEs, compensation must be equivalent to that of other professionals that require comparable qualifications and experience, and have similar job responsibilities; therefore the province must consider salary ranges and benefits for members of similar professions such as for school divisions, when establishing a provincial salary scale. ECE salaries 2009/10 in Manitoba were 47% of that earned by teachers whereas a benchmark of 66% of that earned by teachers is suggested.⁵

2.4 The Government of Manitoba must ensure that the funding formula enables all early learning and child care centres to provide market competitive compensation and all licensed family child care providers to earn a fair income for the valuable service they provide.

2.5 Funding must include human resource needs and expenses in addition to the basic legislated child: staff ratios. Examples include having to pay overtime for evening staff meetings and professional development, a coordinator for the inclusion support program, secretarial, bookkeeper, and janitorial to attend to day to day upkeep and maintenance of the premises and playground.

2.6 Once established, the provincial salary scale must be indexed annually to ensure it stays competitive and is an incentive to remain employed in early learning and child care. The province must increase funding so the scale continues to be affordable over time.

2.7 No one should experience a wage rollback when the province introduces the provincial salary scale.

2.8 Employers should be required to provide a comprehensive group benefits plan of their choosing for their employees.

2.9 In 2001, the Manitoba Child Care Association's Labour Market Strategy Report made nine recommendations to "build the career corridor". The first recommendation, that the Government of Manitoba establish an ECE recruitment and retention committee, has not been established, but remains essential to ensure a comprehensive human resources strategy to address the recruitment and retention issues. We have a decade's long shortage of ECEs, and no formal research done to identify why, nor a comprehensive plan to address the issues.

⁵ Early Years Study 3, 2011

Examples of information that we need in order to develop solutions that will work include:

- Statistical data on the scope of the ECE shortage, a tracking of enrollment into ECE, graduation rates from ECE training, and turnover rates of ECEs
- A projections model to predict demand and supply for ECEs at least 5 years in advance
- Workforce needs according to planned growth of licensed child care spaces and hiring trends of related sectors that employ ECEs
- A mechanism to monitor, to ensure specific annual recruitment targets are achieved
- Mechanisms to survey the field to identify demographics such as gender, ages, diversity, training and knowledge gaps

3. Province Wide Accessibility to Affordable Training and Professional Learning

Background: The link between high quality early learning and child care and caregiver training has been well documented. The quality of care in the child care centre and family child care home will be only as good as the skills of the educator(s).

As early learning and child care has evolved as a service, so have the skill requirements of the educators. Manitoba standards that determine the ECE III classification were developed between 1995 – 1996. The Competency Standards for ECE II were last reviewed in January 2006. Manitoba's Early Learning and Child Care Competency Standards are outdated and in desperate need of modernizing to reflect current knowledge, skills, abilities, and expectations of the child care workforce in 2013.

The Child Care Human Resources Sector Council (CCHRSC), which ceased operating May 2013, has made available current research based Occupational Standards for Early Childhood Educators (2010); Occupational Standards for Child Care Administrators (2012); occupational profiles for school and infant care profiles (2012).

The two year ECE diploma, introduced in 1983, is both the minimum requirement and maximum amount of child care training held by the majority of ECEs classified in Manitoba.⁶ Enrollment in post diploma training programs that lead to an ECE III is low and in the near future Manitoba will have a critical shortage of ECE IIIs qualified to be centre Directors.

Once classified by Manitoba Early Learning and Child Care, there is no ongoing professional development requirement to ensure the educators knowledge and skills keep up with modern philosophies and approaches. Six other provinces in Canada have already introduced professional development requirements for “child care workers or home providers or both”⁷ Funding may not stretch far enough to allow employers to cover the cost of additional training nor that for the substitute or overtime. The education system recognizes that a certified teacher must engage in lifelong learning, and allows for 10 professional development work days per year. There is no such equivalent for the child care educator unless the facility remains open on one of the designated holidays observed by the provincial government and gets permission to

⁶ Information on classifications provided by Manitoba Early Learning and Child Care.

⁷ Office of the Auditor General – Manitoba, January 2013, page 136

take another day in lieu of. No allowable professional development days for educators of children during the most critical time of human development is very out of step with current research and knowledge requirements.

In 2012, a majority of the practicing child care workforce in Manitoba are Child Care Assistants (CCAs)⁸. A CCAs role should be to assist the Early Childhood Educator. However in the absence of ECEs, many CCAs are expected to take on the role and responsibility of the ECE. A 40 hour course requirement for all new CCAs and Family Child Care Providers was introduced in 2003, following a recommendation from the Child Care Regulatory Review Committee. The intention was to ensure all entry level educators had a basic orientation in child development, guiding children's behavior, and child care regulations. It was seen as a first step to training, but hasn't increased in 10 years.

As there is an unresolved shortage of ECEs, the majority of the child care workforce in Manitoba has no more than 40 hours of orientation training in early learning and care – a significant weakness in a province with a healthy child strategy and a strong interest in ensuring the best possible outcomes for Manitoba's children.

Priority Recommendations to the Government of Manitoba:

3.1 Manitoba needs to update the competency standards for Early Childhood Educators and child care centre Directors while the resources from the CCHRSC are current enough to be used as a resource.

3.2 Manitoba needs to undertake an assessment of the knowledge, skills, and abilities required of licensed family child care providers, update the competency standards to reflect current skill requirements, and examine the approved 40 hour training courses to ensure the competencies are covered.

3.3 In 2011, the Child Care Education Program Approval Committee developed a draft submission for the Education and Training for ECE III. The submission recognized the pan-Canadian trend toward integration of child care and education, the move toward degree programs as entry level training for ECE, the need to review training requirements for ECE III classification, and for providers of school age care. This initiative was a good first step in reviewing and modernizing Manitoba's classifications, however there has been no action on the submission for two years. MCCA recommends CCEPAC be provided with paid staff support in order to provide leadership in ECE training for Manitoba, complete work on the submission, and that community consultations be conducted on CCEPAC's recommendations prior to adjusting classifications for ECEs.

⁸ Office of the Auditor General – Manitoba, January 2013, page 127

3.4 Make available in Manitoba post-secondary Early Childhood Education programs at the Bachelor's, Master's, and PhD levels.

3.5 Introduce a continuous professional learning requirement of 24 hours per year for all Early Childhood Educators, Child Care Assistants, Family Child Care Providers, and Child Care Coordinators.

3.6 Allow licensed facilities to close without loss of income for at least three professional learning days annually.

3.7 Introduce an annual professional learning support grant in the amount of \$350.00 for each Early Childhood Educator, Child Care Assistant, Family Child Care Provider, and Child Care Coordinator.

3.8 Require 60 hours of introductory training within one year of employment, the cost of which is entirely funded by the Government of Manitoba through the tuition support grant.

3.9 Establish an enhanced funding model for family child care providers participating in ECE training that ensures an increase in income as milestones are achieved.

4. Accessible, Affordable, High Quality, Early Learning and Child Care Services

Background: At the end of the fiscal year 2012, there were 30,614 regulated child care spaces for the 111,700 children 0 - 12 years, with mothers in the paid labour force (2012 rounded estimate).⁹

As of June 29, 2013 there were 11,415 individual children registered for a child care space on the online registry. Of those, 7,963 require care in three months of June 28, 2013. This is an increase of over 1,000 total registrants since the same June 29, 2012. Many of these are in addition to the thousands that are still on paper lists that facilities are still working through. Wait times range from months to years across all age groups.

Parents in need of child care to work or attend school face lengthy wait times for a licensed space, and there is no comprehensive provincial or national policy framework on the horizon to address this problem.

A recent article *Who Collects Welfare*, Winnipeg Free Press, August 17, 2013 stated that 25,400 welfare recipients are single parents and their children, "many of them struggling to find decent, affordable daycare so they can return to work." Manitoba spends about \$320 million a year on welfare, three times more than grants to colleges, and about 10 times more than the province spends prosecuting criminals.¹⁰

⁹ Early childhood education and care in Canada 2012

¹⁰ Manitoba Entrepreneurship, Training and Trade annual report 2011/12

The gap between parents seeking licensed child care and those able to access the public system is staggering. Anecdotally, it is likely a majority are in unlicensed child care, where the monitor quality of health, safety, and learning environment is entirely up to parents.

On May 30, 2013, an incident in Winnipeg made national news headlines when an unlicensed home child care provider was reported to have left six children under the age of five unattended for more than an hour. A few weeks later, there was the tragic news that a two year old died in an unlicensed child care home located in Toronto. It was reported there were twenty seven children in the home when the coroner arrived. And then in mid-July, a Calgary woman was charged with second degree murder in connection with the death of a toddler in 2012, also in an unlicensed child care home. To protect the safety and wellbeing of our children, it is time to have a conversation about whether all home based providers of child care to non family members should be regulated and licensed.

The shortage of licensed child care has also created a climate conducive to the expansion of for profit, privately owned child care centres now opening in more affluent areas of Winnipeg. Only time will tell how fast the private sector will expand in Manitoba. However, the Government of Manitoba must not rely on commercial services and in home unlicensed providers to fill unmet need and must continue to provide public funding exclusively to not for profit, publicly managed services.

For many children, success in school will begin in a licensed early learning and child care program. As the early childhood environment changes, for example inclusion of children with additional support needs, and more emphasis on curriculum, child care settings require educators with higher or more specialized skills to work with children.¹¹

Manitoba has full participation of 37 school divisions in Early Development Instrument (EDI) data collection (2005/2006 school year). Distribution of the EDI data has largely focused on schools and school divisions. It is used by them to inform planning and implementation of initiatives that help children to prepare for successful school entry¹². However, the early learning and child care facilities have daily contact with close to 20,000 preschool children and their families and are an important partner in early learning prior to school entry. They too could use EDI data to strengthen their curriculum if an equivalent effort to distribute reports directly to them was introduced.

Priority Recommendations to the Government of Manitoba:

4.1 Manitoba needs to address the issues that are barriers to recruitment and retention so that licensing of new spaces to close the gap between supply and demand is both possible and in balance with the availability of a child care workforce as required by the Community Child Care Standards Act.

¹¹ Occupational Standards for Early Childhood Educators, Child Care Human Resources Sector Council, 2010

¹² The EDI Teacher Newsletter, Healthy Child Manitoba, Winter 2012

- 4.2 The Online Child Care Registry provides information about the need for early learning and child care services by age and by region. If online registry data is not sufficient to establish need, the Government of Manitoba should complete the data collection requirements and not require community volunteers to undertake an expensive, time consuming, needs assessment in order to establish a new service or expand an existing service.
- 4.3 Capital funds, start up grants to match actual start up costs, and full operating grants must be available to all eligible programs at the time of licensing.
- 4.4 Continue to establish child care centres in all new schools and in schools that have major renovations and make capital and renovation funds accessible to non school based sites as well.
- 4.5 Ensure at least one child care centre in each school division that is built under the child care in school policy receives enhanced funding to offer extended hour services if demand exists.
- 4.6 Ensure continuity for children and families. Once established in a school, an early learning and child care centre should not be displaced out of the school for any reason as long as the need for the child care service continues.
- 4.7 Require schools and the child care centres co-located in them to jointly develop “duty to cooperate agreements.”
- 4.8 Provide leadership, expertise, and support to ensure the introduction of preschool programs by school divisions do not jeopardize the stability and viability of licensed child care spaces. Facilities may require flexibility in the calculation of utilization, funds to retrofit and convert spaces to suit younger children, and higher funding to cover the additional staffing costs required by ratio.
- 4.9 Ensure funding policies consider family needs first. For example, include transportation time in calculation of subsidy eligibility for 4 hours, for 4 – 10 hours, and for 10+ hours as well as flexible subsidy funding for children with additional service needs.
- 4.10 Ensure affordability for parents by implementing annual indexing of subsidy levels and continue to make subsidy available to all eligible families.
- 4.11 Address access issues such as those related to school catchment areas, need for part time, extended hour, occasional, weekend, or overnight care.
- 4.12 Ensure public policy and child care funding align with early learning and child care services as the first tier of public education. Build a solid foundation inclusive of the funds, resources, and supports so facilities can open and operate in compliance with the best and highest research based standards, employ the highly skilled, well trained educators, provide a developmentally appropriate, play based program, in purpose built indoor and outdoor learning environments.

4.13 Engage the child care community in a review of the Inclusion Support Program to identify strengths and areas for improvement related to inconsistencies, accessibility, funding, training, reporting, and staffing needs for safe and successful inclusion.

4.14 Manitoba needs to develop a multi-pronged consumer protection and education strategy about early learning and child care including:

- print materials provided to every new parent at the time of birth/adoption
- print materials available at places parents and children attend - medical clinic's, public health offices, regional health offices, hospitals, family resource programs, licensed child care facilities, schools, public libraries, recreation facilities, etc.
- display at family events such as the annual Winnipeg Baby and Kids Show, the Teddy's Bears Picnic, Kids Fest, and similar community events held throughout rural Manitoba
- modernize and expand the Manitoba Early Learning and Child Care website to make it user friendly, and include easily accessible information on early child development and quality child care in languages reflective of newcomers to Manitoba as well as English and French
- television commercials and newspaper ads on quality early learning and child care similar to those developed by MPI to remind drivers of the rules of the road
- consumer protection strategies to inform the public about the legal limit for unlicensed child care and how to report concerns. For example, ads placed in the "child care" section of newspapers and online bulletin boards, and posters on community bulletin boards

4.15 Distribute EDI reports directly to all child care programs so they too can make informed decisions about how to support the development of their children.

5. Adequate Funding For A High Quality Early Learning and Child Care System

Background: Early learning and child care service providers rely on the Government of Manitoba to ensure the funding formula, whether through federal transfers, through parent fees, or through provincial grants, can cover the cost of a quality care and learning environment for children and a competitive wage and benefit package at a level likely to attract and retain a child care workforce in sufficient number to meet legislated training requirements.

The combination of increases to operating grants and new maximum parent fees in 2012 and 2013 provided much needed new revenue to enhance caregiver wages and to help offset increases in operating grants.

However, funding increases are inconsistent and uncertain from year to year, even though operating costs are guaranteed to increase annually and the money to cover those costs must come from somewhere. The unit funding model was established for child care centres in 2000

based on a rough estimate of typical operating expenses at that time. Centres incur operating costs in 2013 that did not exist when the unit funding model was calculated. Some are related to Employment Standards, such as overtime for staff meetings held after hours; some arise directly from government initiatives such as licensing with ECERS others due to changes in safety procedures.

In addition, regular increases to the provincial minimum wage, the recent increase to the PST and other new taxes added to services such as insurance, rent charged by school divisions or other landlords, inflationary increases to all operating expenses all require a reliable, stable, and predictable funding formula.

Priority Recommendations to the Government of Manitoba:

5.1 Ensure operating funding will support the market competitive wages necessary to attract and retain a skilled child care workforce.

5.2 In consultation with direct service providers, undertake a study of options for a modernized funding model, that provides stable funding that reflect current operating costs, and does not unduly burden volunteers with fundraising in order to establish or remain viable.

5.3 Operating costs increase annually and funding must also increase annually at or above the rate of inflation, inclusive of all standard operating expenses, such as market competitive compensation rates, employer portion of benefits, children's program, and which may also include variable expenses such as rent, utilities, administration costs, special circumstance expenses and the cost of all government mandated requirements such as new legislation, quality enhancements, or minimum wage increases.

5.4 In the same way that the Manitoba Rent Guidelines provide "fairness for renters and property owners", child care funding must provide fairness, neither charging unaffordable fees to parents, nor expecting employees to subsidize the cost through lower compensation or fundraising. Landlords can apply for an increase beyond the allowable minimum if they can show the increase will not cover costs; a similar option must be developed for child care centres if their maximum allowable revenue cannot cover operating costs.

5.5 The Government of Manitoba should regulate the maximum fee child care centres must charge. Leaving it up to the Board of Directors, a majority of whom are parents having to decide on a fee increase for themselves, is an obvious conflict of interest.

6. Strong Governance and Skilled Administration

Background: Every licensed full and part time not for profit child care centre is currently required to have a board of directors, of which a minimum of 5 must be parents of children who attend the facility. There are no criteria for qualifications or expertise in any of their roles or responsibilities. These volunteers are totally responsible for overall governance and many struggle to establish new programs, hire staff, develop policies and procedures with minimal to no access to assistance, support, training, support, nor mediation if problems arise. Most are probably totally unaware of their personal and collective legal liability, and not required to approve or even be informed of licensing reports. Manitoba Early Learning and Child Care does offer a board training workshop, however it is optional. A 151 page board development guide is available for download. It was last re-printed in 2002 and may be in need of a review to ensure it reflects current trends in board governance.

The multiple demands of managing and leading an early learning and child care program in the 21st century requires the centre director to have extensive knowledge in child development along with program management, organizational management, financial management, human resource management, and public relations expertise. The cap on the maximum number of spaces a facility can be licensed for was lifted years ago, and multi-site locations with hundreds of spaces and dozens of staff is the new normal. However, management training is not a requirement for a centre director, nor is there a requirement for ongoing professional development. Facilities outside of Winnipeg are usually the ones that can't recruit an ECE III as director, and less trained employees are in the driver's seat. The likelihood of there being a gap between knowledge and job requirements is high, placing significant risk on those ultimately responsible for governance – the board of directors.

Integrated service delivery, introduced in 2002, may have improved access to services for some Manitobans, but it has created a split between the policy and planning department and service delivery. Child Care Coordinators are expected to deliver the MELCC program within their regions, however they report to regional supervisors that are not ECEs and may know nothing about early learning and child care. That has created its own set of problems. The child care community continues to be frustrated by inconsistent direction and information provided by CCC's, who are disconnected from the policy and planning branch.¹³ A recent example is the directive regarding infant naptime supervision that later needed to be revised because it was not practical for the child care centres and also negatively impacted on the quality of care provided to infants.

Priority Recommendations to the Government of Manitoba:

6.1 Assemble a team of experts to provide resource, guidance, and support to board members that are developing business plans, have construction projects, negotiating lease agreements, developing business plans and budgets, making financial decisions, writing policies, establishing

¹³ Office of the Auditor General's Report – Manitoba, January 2013

salary scales and personnel policies, etc. through to when the facility has the funds to hire the expertise they require.

6.2 Make available province wide accessible and affordable training, resource, in-servicing and ongoing support to the Boards of Directors of licensed full and part time child care programs.

6.3 Require all licensed full and part time child care centres to have contents insurance and Directors & Officers liability insurance.

6.4 Require that a minimum of one elected representative from each child care centre participate in the board governance workshop offered by Manitoba Early Learning and Child Care.

6.5 Require centre directors to have a relevant credential in management and to participate in a minimum of 24 hours of professional development annually.

6.6 Add to the Community Child Care Standards Act, that every child care centre must establish a code of conduct that applies specifically to members of the board of directors.

6.7 The procedure MELCC will follow during an investigation of allegations or complaints against a licensee or anyone classified and employed in a licensed facility be communicated in writing to all licensed child care facilities. MELCC needs to ensure the length of time required to complete investigations is completed quickly in order to minimize stress, disruption, and cost to the facility.

6.8 MELCC policy and planning branch should consult with direct service providers to test initiatives before announcing them.

6.9 Resolve the management, accountability, communication, and inconsistency problems inherent in the integrated community service delivery model for child care, and have the Child Care Coordinators supervised by and reporting to the policy and planning branch of MELCC.

7. Provincial Leadership to Ensure Collaborative Relationships with Education

Manitoba Education and school boards throughout Manitoba are tuning into the abundant research that proves that the years prior to school entry lay an important foundation for future child outcomes. School divisions are already introducing a variety of informal or formal preschool programs to foster healthy child development and learning during the preschool years. Several school divisions have implemented nursery school programs for four year olds, and have full school day kindergarten programs for five year olds.

A full school day for four and five year olds does not eliminate the need for child care for most families; it changes it. In order to avoid chaos, those changes must be anticipated, planned for, and addressed early in the transition in order to ensure the ongoing viability of the child care programs, and availability of non school services for children. Child care centres report schools

do not typically consult them before making changes that affect preschoolers, leaving families and child care out of the decision making loop even when the change affects them.¹⁴

Implementation issues in Manitoba are likely to mirror those of the Ontario Early Learning Program, as it was introduced beginning in 2010. The most common include:

- child care centres using surplus classroom space told to re-locate to make room for full day kindergarten and nursery school students
- an increase in the number of portable classrooms
- a surge in the number of bussed students due to overcrowding
- the provincial government has spent \$1.4B to cover capital costs related to retrofitting and construction of new classroom space
- existing child care facilities facing reduced access to classroom space yet expected to accommodate the increase in parent demand for before and after, inservice, and full day school holiday care for four and five year old
- the loss of the four and five year olds has significant financial implications for child care revenues. In Ontario, centres have closed. In Manitoba, centres most at risk are all licensed nursery schools, and child care centres located in rural communities.
- additional operating costs for child care centres whose preschool program will be limited to two and three year olds. Toronto Children's Services provided the Early Learning Transitional Capital Funding to help child care centres renovate spaces for younger children.
- family child care providers having to choose between a reduced income or taking more two and three year olds
- better compensation in the school system has added to the recruitment and retention problems in child care

Priority Recommendations for the Government of Manitoba:

7.1 Provide leadership to ensure decisions made by Manitoba Education and/or provincial school boards regarding full day kindergarten and/or nursery school programs are made in consultation, cooperation, and collaboration with Healthy Child Manitoba, the Department of Family Services & Labour and direct child care service providers in order to enable the early learning and child care programs to remain financially viable, operational, and responsive to changing community needs.

¹⁴ Manitoba Child Care Association online survey, *Trends and Issues*, February 2011

MCCA Response to the Office of the Auditor Generals Report 2013

The Office of the Auditor Generals (OAG) report on the Manitoba Early Learning and Child Care Program, January 2013 provided an inside and objective look at program management, including systems and practices for planning and performance measurement, ensuring compliance with child care standards, and the providing of financial support to eligible child care facilities and families.

It highlighted a number of areas of concern that must be addressed to ensure the health safety, and well being of children, and minimize liability to child care practitioners and parent volunteers. The Manitoba Child Care Association agrees with the recommendations of the Office of the Auditor Generals Report, and believes they will contribute to stronger oversight, improved licensing, higher quality, better communication. We are in support of the recommendations, a summary of which is attached, and urge MELCC to act on them promptly.

MCCA is disappointed that a number of issues or suggestions were noted or made in the OAG's report that were not included as recommendations that we consider to be important to strengthen the child care system. Therefore MCCA recommends:

- MELCC should generate and make public quarterly reports on the levels of compliance with key standards, quality assessments of learning and development activities in all licensed facilities including ECERS and ITERS reports for each facility
- the results of inspections and monitoring visits should be signed by a board member and posted in facilities
- MELCC should post inspection results for each facility online, and include a history of each facility's inspection results, including dates when standards violations were corrected
- MELCC should track of the number of ECE IIs and IIIs required by licensing across the province, entry and exit rates, and provide quarterly reports to the public, to service providers, and to stakeholders
- far greater coordination between schools and child care facilities is required and MELCC should build a process into its structure to provide dedicated staff support. Currently, in the absence of a policy on "duty to cooperate", centre directors/board of directors are left to address relationship or shared spaces problems on their own
- MELCC should consult with a cross section of service providers before introducing changes, such as the locked door requirement that cost government more than expected, or the infant naproom supervision whose initial requirements negatively affected quality for children and cost for program
- the possibility of future licensing of on-reserve First Nations child care will require MELCC to engage in much pre-planning both internally and with stakeholders. Two

examples include research to identify trained staff needs should be completed, communicated, and plans developed to increase the availability of ECE training in urban, rural, northern and remote locations. Funding for retrofitting of child care facilities to provincial standards will likely be required

- identify a faster and more affordable method of criminal record checks that has a 10 day maximum turn around time and enables checks to be transferable within the licensed child care system
- criminal record checks should be required for substitutes in family child care homes
- employees of child care centres and licensed family child care providers should be expected to meet professional development requirements
- there should be a limit on the number of consecutive provisional licenses for the same issue
- facilities should be inspected prior to renewing a provisional license
- ECERS and ITERS assessments should not replace CCC monitoring visits
- Child care centres should be required to develop and report conflict of interest situations such as board members that have a personal relationship with centre employees
- Directors report they rely largely on “word of mouth” for how the child care system “works”. MELCC should establish and provide to each licensed facility a current copy of a written policy and procedures manual, to make it possible for them to know and comply with expectations and requirements. The manual should be inclusive, ranging from what MELCC recommends to be a fiscally prudent and acceptable excess operating fund which considers factors such as pandemic planning to written policies for the Inclusion Support Program to ensure facilities are aware of the process to apply, how applications are assessed, and how funding support is determined
- MELCC must ensure facility compliance with their minimum wage rates, parent fee maximum, and all aspects of the Child Care Worker Retirement Benefits Regulation
- MELCC should modernize its website to make it more user friendly, and add important public information such as subsidy tables