



**Manitoba Child Care
Association**

Planning for the Future

Early Learning and Child Care in Manitoba



**Recommendations to the Government of Manitoba
December 2014**

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Summary of Priority Recommendations for Early Learning and Child Care 2015 – 2016

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 plans by government, NGOs, individuals, and families.
3. By 2021, a re-designed child care system should provide a universally accessible range of not for profit services, delivered within an integrated system where there is a true and equal partnership between child care and education.
4. An ECE Recruitment and Retention Committee should work with government to identify and implement strategies to ensure an available, skilled, and fairly compensated child care workforce.
5. MCCA's 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.
6. Funding needs to increase annually to reflect changes to operating costs, inclusive of market competitive wages.
7. A strategy must be introduced to help facilities with higher than affordable operating costs due to, for example, fixed expenses such as rent.
8. Regulate the maximum fee child care centres must charge.
9. Raise the maximum daily fees across all age groups, to reflect the January 1, 2015 increase of the Universal Child Care Benefit.
10. Update Manitoba's competency standards for ECE's, administrators, and family child care providers.
11. ECE classifications should be updated to reflect changing knowledge requirements, and entry level training for CCA's and FCCP's should be increased to 60 hours.
12. A minimum professional development requirement of 24 hours per year for all practitioners should be introduced, along with 3 paid in-service day closures annually without loss of revenue, and funding for a professional development support grant.

13. Subsidy levels should be reviewed and indexed annually to ensure child care fees are not a barrier to education or to workforce participation.
14. The Province of Manitoba should introduce a consumer protection and education strategy to inform parents of how to choose quality child care.
15. Provide training, resources, assistance, and support to board members.
16. Return Child Care Coordinators to work directly under the MELCC Policy and Planning Branch.
17. 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.
18. 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. We are pleased the practice of developing long range plans continues with the announcement of Manitoba's Plan to Expand Early Learning and Child Care, 2014

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 have proven to be successful in improving quality, enabling expansion, building a workforce, and supporting families.

There has been good progress but there is much more work to be done. The policy recommendations from MCCA, as the recognized voice of the child care community in Manitoba must be considered when planning.

Universally Accessible Child Care - A Bold Plan for Moving Early Learning and Child Care Forward

It was exciting to hear the Throne Speech, November 20, 2014 in which the Government of Manitoba committed to build a universally accessible child care program for all Manitoba families who choose to use the service. It is important to build it right, therefore 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, skilled early learning and child care workforce
- ensure province wide accessibility to affordable training and professional learning
- provide enough accessible, affordable, high quality early learning and child care services which meet a range of family needs
- ensure adequate funding for high quality early learning and child care services
- 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 September 30, 2014 there were 11, 779 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, continues to escalate, 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 center 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 center.

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 more realistic for volunteers, more responsive 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 ensures a range of child care options across the

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

province, skilled leadership, strong governance, stable funding, modern legislation, and a trained, well compensated and supported early learning and child care workforce.

MCCA recognizes the plan to establish a Commission on Early Learning and Child Care is an important step toward a universally accessible system. There is an urgent need to explore options for a re-design of the delivery system into one far less reliant on volunteers, while still under public management. We recommend the Commission explore the feasibility of a child care system integrated with education, as recommended by the Organisation for Economic Co-operation and Development. (OECD).

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 universally accessible 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

1.5 An integrated system must be carefully pre-planned to ensure a smooth transition and a true and equal partnership. There must be substantial lead in time, and complete engagement and communication with all stakeholders in advance of changes.

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

Doherty (1999) states that “the best regulations in the world are useless unless monitored by people with Early Childhood Care And Education training and experience, and (licensing) infractions are consequenced.” (Toward a Best Practices Framework for Licensing Child Care in Canada.

² Early Years Study 3, 2011

Background: There is much research that proves 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 not one of them. Government controlled parent fees and operating grants fall short of that required for most child care centres to afford to pay wages at market levels to all employees. The minimum hourly starting salary for an ECE has been \$15.50 an hour since 2009, which is 15% below the 2014 market competitive of \$18.00 an hour. This variance amounts to \$5,200 in lost income to the ECE annually and also means that ECEs earn less so the government and parents can both pay less for the service. Licensed family child care providers that receive an operating grant earn far less per day than the going rate charged by unlicensed babysitters, and are also indirectly subsidizing the cost of the service. There is no doubt that the availability of licensed child care depends on the altruism of the child care workforce.

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 where it is difficult to earn a decent standard of living independent of spouse or family.

Government is well aware that wages need to increase and has indicated support in every long range plan. It urges boards of directors to direct new funding to compensation, and has completed several public consultations where it has heard loud and clear the extent of the problem and how it affects expansion plans and quality of service. While the workforce waits for details of a concrete strategy, the 2012 commitment to develop a provincial wage scale has shifted to a 2014 plan to establish another wage enhancement grant to support long-term ECEs. Regardless of the strategy that is introduced, MCCA cautions that introducing an initiative that falls below market competitive wages for all will lead to more discouragement, and increase exit rates from the field. After decades of steps, the workforce is entitled to expect a wage strategy that solves the problem, not creates another one.

There is a shortage of available Early Childhood Educators in Manitoba, even though it is now 31 years after minimum trained staff legislation was introduced and there has been a recruitment and retention strategy in place for more than a decade. In 2013, 19% of centres and nursery schools were unable to recruit trained staff 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 2014, the percentage of centres not meeting trained staff requirements decreased to 26.8% however the licensing authority will recognize a staffing plan as equivalent to trained. For the record, MCCA does not support the relaxing of how regulations, are enforced as it affects the quality of care children receive, hides a problem, and deceives the public. Trained staff requirements, in actual day to day practice have become eroded as the need to add new spaces has taken priority over the availability of early childhood educators.

Governments plan to invest in over 5000 new and newly licensed spaces over the next five years will require 500 more ECEs. In addition, the hiring needs of school divisions and other employers that value ECE training, college and school division instructors in ECE, child care coordinators, exit rates, and the aging of the ECE workforce must be considered. A universally

³ Office of the Auditor General – Manitoba, January 2013

accessible child care system for Manitoba should also include children living in First Nations communities, which means on reserve programs will also require additional ECE;s. Workforce planning projections must be inclusive in order to establish effective recruitment and retention plans.

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 2014
- ✓ 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

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.⁴

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

⁴ Early Years Study 3, 2011

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, remains essential to ensure a comprehensive human resources strategy to address the recruitment and retention issues. The new Early Learning and Child Care (ELCC) Recruitment and Retention Roundtable is a welcome initiative that has the potential to build on the recommendations previously made by the Child Care Regulatory Review Committee (1996 – 2014) and the various child care task forces and consultations.

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 – 1996⁵. The Competency Standards for ECE II were developed in March 1985, and revised in 2009.

⁵ CCEPAC Submission on future direction for the Education and Training for ECE III, 2011

More recently, 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). Although there is no post-secondary training program specifically for family child care providers, the licensing coordinators do use a set of competency standards to assess applicants for a family child care license. As expectations of providers have increased, it is likely the knowledge they require will also have to be enhanced in order for them to be successful in meeting licensing standards, and in providing care and early learning for children. MCCA suggests all Manitoba's Early Learning and Child Care Competency Standards are in need of review and modernizing to reflect current knowledge, skills, abilities, and expectations of the child care workforce in 2014.

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.

Centre directors are not required to have training in management, administration, human resources, or finance. ECE training focuses on the skills required in the classroom, not in the boardroom. You Bet I Care! found that many directors lack adequate preparation for the job. They are "one man bands" expected to know everything from pension plan legislation to basic plumbing to capital project management to Human Rights legislation. They may be responsible for multiple sites, dozens of employees, and multi-million dollar budgets.

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 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

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

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

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

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.

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 \$400.00 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.

3.10 Child Care Coordinators should have a professional development requirement to upgrade their skills and knowledge to ensure they are informed of the latest research, practices, and trends, can be a resource and effective as a monitor of regulations and quality.

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

Background: At the end of the fiscal year 2014, there were 32,555 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 September 30, 2014, there were 11,779 individual children registered for a child care space on the online registry. This is an increase of 634 since September 30, 2014. Some child care centres keep their own paper lists, so the registry may under report demand. 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. Anecdotally, it is likely a majority of Manitoba's preschoolers spend their early years in unlicensed child care, where there is no monitor on quality of health, safety, and learning environment. One should wonder if there is a link between the quality of early child development in Manitoba and the results of the recent Pan Canadian Assessment Program (PSAP) whereby Manitoba students in grade 8 scored last in math, science, and literacy.

Manitoba should review the provision of in home child care by non-family members and introduce a strategy to ensure basic expectations of caregivers. For example, a consumer protection and public education strategy to help parents identify quality child care, with increased penalties for offences under the Community Child Care Standards Act from the current \$1000.00 and if the violation continues for more than one day to a further fine of not more than \$200.00.

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

⁹ Early childhood education and care in Canada 2012

additional support needs, and more emphasis on curriculum, child care settings require educators with higher or more specialized skills to work with children.¹⁰

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 entry¹¹. 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.

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.

¹⁰ Occupational Standards for Early Childhood Educators, Child Care Human Resources Sector Council, 2010

¹¹ The EDI Teacher Newsletter, Healthy Child Manitoba, Winter 2012

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 clinics, 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. For these reasons, MCCA supports governments plan to annualize child care funding.

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 actual 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.

5.6 The Government of Canada provides a Universal Child Care Benefit to “*help Canadian families.....by supporting their child care choices through direct financial support.*” The federal government recently announced it plans to increase the Universal Child Care Benefit by \$60.00 a month starting July 1, 2015 and extend it to parents of school age children. MCCA recommends the Government of Manitoba should add \$3.00 a day (\$60.00 divided by 20 work days a month) to the daily cost of regulated child care fees in Manitoba. This would generate over \$25.M more revenue into child care facilities a year, which is likely enough new revenue to ensure competitive salaries for the entire child care workforce.

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 and staff are not always available to host it. 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 has not increased in proportion to the size of facilities directors can now be responsible for, 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.¹² An 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 and budgets, for construction or renovation projects, negotiating leases, making new financial decisions, writing policies, establishing salary scales

¹² Office of the Auditor General's Report – Manitoba, January 2013

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.¹³

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:

- 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, in-service, 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, Manitoba Family Services 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.

¹³ Manitoba Child Care Association online survey, *Trends and Issues*, February 2011

MCCA Response to the Office of the Auditor General's Report 2013

The Office of the Auditor General's (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 wellbeing 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 General's 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

- 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