



**Ontario Municipal Social Services Association: Submission to the Standing
Committee on Social Policy Regarding Bill 10, the Child Care Modernization Act**

Tuesday, November 18, 2014- 4:30pm

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**Remarks by Petra Wolfbeiss, Ontario Municipal Social Services Association
To the Standing Committee on Social Policy
Regarding Bill 10, *the Child Care Modernization Act*
Tuesday, November 18, 2014-4:30pm
Room 151, Main Legislative Building, Queen's Park, Toronto**

Good afternoon, my name is Petra Wolfbeiss, I am the Director of Policy and Public Affairs for the Ontario Municipal Social Services Association (OMSSA).

On behalf of OMSSA I would like to thank the members of the Standing Committee for the opportunity to present to you today.

OMSSA represents the 47 Consolidated Municipal Service Managers (CMSMs) and District Social Services Administration Boards (DSSABs) who fund, manage and deliver child care and early year's programs across Ontario.

Our members represent local governments from every region in the province.

OMSSA believes Bill 10 is an important step to developing a strong and effective system of child care and early years. A system that promotes the opportunity of lifelong learning for all of Ontario's children in environments that promote quality and ensure safety.

It is also a Bill that supports the shared objectives of poverty reduction and strengthening Ontario's labour market and economy into the future.

OMSSA and its members are pleased that Bill 10 confirms CMSMs and DSSABs as the service system managers of child care and early year's programs and services and that the Bill commits to integration of human services at the local level.

Bill 10 recognizes the important role of local government and municipalities in working with children and families in the communities where they live. It also affirms OMSSA's contention that working at the local level to integrate services and connecting needs to available resources and services is the most effective approach.

As the service system managers for child care and the early years, CMSMs and DSSABs will play an important role in both implementing the Bill if passed, as well as in modernizing Ontario's child care and early year's system.

Given this role we assume that OMSSA and its members will work as partners in the regulation development process and all aspects and considerations of implementation.

Doing so, we believe, will achieve the legislation's objective of improving safety and facilitating the learning, development, health and well-being of children in the child care system.

To support the successful implementation of the legislation, it will be important that new requirements are enforceable and implementable. This includes ensuring that CMSMs and DSSABs do not assume risk, liability or costs under this legislation or its regulations.

What this means is that as CMSMs and DSSABs assume the service system manager role under the new legislation that they will be provided the time, tools and resources to fulfill all the obligations and expectations therein.

This includes in the areas of service planning, training and increased administrative requirements that may result from working with providers.

OMSSA members have identified a number of areas where clarification and appropriate resources to fulfill obligations is needed.

This list is not exhaustive but includes:

Ratio's and grouping:

Bill 10 includes new flexibility for agencies and service providers to meet community need. This includes home child care providers.

Recommendations:

- To support this, the government must ensure capital funding is available to accommodate changes that may be required.
- Home care providers can now have up to 12 children in their care. With municipal funding attached to home care providers, OMSSA, CMSMs and DSSABs want assurance that appropriate oversight and monitoring will be in place to ensure children are safe and well cared for.

Role of Service System Managers-municipal and DSSAB obligations.

The government's intention with Bill 10, in part, includes the move to an integrated, coordinated and seamless system of services for families and children in the communities where they live.

OMSSA supports the flexibility provided in the proposed legislation and advises against a prescriptive approach to local planning.

In order to achieve this, municipalities and DSSABs must be provided the authority, tools and resources required to fulfill this obligation.

Overall, the Bill is a good step *towards* integration but is not complete – Ontario Early Years Centre’s, Parent and Family Centres - how do they fit? What is the vision and how will these services and systems be integrated?

Section 56 (c) identifies the obligations of coordinating and planning for the local child care and early years systems and (d) assessing economic viability of the same local programs.

Section 62 (i) identifies the CMSM and DSSAB role in identifying and commenting on licenses.

Section 18 (i) under the legislation would require certain persons, prescribed under regulation, who in the course of their duties have reasonable grounds to suspect an imminent threat to the health and safety of children receiving child care, in either licensed or unlicensed settings, to report this to the ministry.

Finally, section 51 (4) requires that service managers, “shall consult with school boards and other prescribed entities,” through their service planning.

Moving in the above directions expands the municipal and DSSAB role in service system management of child care and early year’s programs.

Recommendations:

- To support and promote coordination of funding and seamless access to services, the service system manager role must be reflected and utilized in related ministries whose priorities, initiatives, funding and other responsibilities align, interact with and impact early years and child care programs. For integration and coordination to happen on the ground it must happen across provincial ministries.
- Appropriate resources must be provided to CMSMs and DSSABs for staffing and administrative costs to carry out expanded obligations and current unfunded mandates.
- Any expanded obligations or requirements must be enforceable and must protect against increased risk and liability to municipal governments and DSSABs.
- For the service manager role to be effective, CMSMs and DSSABs must have the authority to align planning and administrative practices with all partners. This includes aligning with municipal and DSSAB planning and budgeting processes.

Special Needs

OMSSA members have expressed concern with the absence of special needs in Bill 10.

Recommendation:

- CMSMs and DSSABs need clarity on how special needs and the provincial strategy fit into Bill 10 and local integrated service system planning. Given the requirement in the new child care funding model and the General Operating Grant of a 4.1% spending allocation on special needs, it is unclear how special needs fits into the new legislation and the service manager obligation.

Provincial interest and policy statements:

Section 49 of Bill 10 identifies the provincial interests that will form Ontario's system of child care and early years. All matters that are important, admirable and supported by OMSSA and its members.

Bill 10 also indicates that the Minister, under legislation, may introduce a provincial policy statement further indicating matters of interest and obligation.

Since 2009 the province of Ontario has assumed a critical leadership role in moving early learning and child care forward. It is a commitment that OMSSA and its members understand and support in the opportunities it provides for families, children and our future economy.

This includes moving to a system that is flexible and responsive to local needs and capacities.

OMSSA understands that the devil will be in the details, and we also know, that despite the ongoing efforts by the government, that our system remains underfunded.

It will be critical that implementation of this Bill not further exacerbate this tension nor the pressure to deliver on unfunded mandates at the local level.

We recognize that all orders of government must come to the table as willing partners.

Municipalities and DSSABs are willing and interested partners in implementing the vision of a modernized system of services for children and families in Ontario.

But, they must be able to do so. And, this will require the appropriate time, resources and capacity for service managers to take on their important obligations.

Thank you for the opportunity to comment on Bill 10.