

# Coalition of Child Care Advocates of BC

Working for a non-profit child care system that is high quality, affordable, accessible and accountable.

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## **Community Care Facilities Licensing Child Care Regulatory Review – Public Consultation**

**Submitted November, 2004**

### **Introduction:**

BC was the first jurisdiction in Canada to license child care services under legislation and this province's child care regulations have traditionally contributed to promoting healthy child development and training, all of which have impacted on and worked towards improving the quality of child care programs.

Any adjustments to the licensing regulations must continue in the tradition of improving and strengthening quality. But, at the same time that we respond to the request for public consultation by the Ministry of Health, we are gravely concerned that internationally and locally, reports and research affirm that:

- legislated standards and capacity for monitoring and enforcement are key to the quality of child care programs.
- strong regulations regarding provider training, group size, physical space, and health and safety precautions should reflect the developmental needs of all children, best practices to stimulate play and learning, and research about early learning and quality child care.

But, the BC government is now, more than ever before, promoting license not required child care.

The funding cuts over the last three years and recent policy changes are making licensed care more fragile and unaffordable and if the government stays on this path, the only option the majority of families in many BC communities will have is care with license not required providers.

As always, achieving quality care in BC depends upon improved inter ministerial cooperation, integrated policy development, and a provincial commitment to a child care system that is funded as a public program and is based on the extensive research including what we know about the importance of legislated standards.

**Response to specific questions as outlined in the *Community care Facilities Licensing Child Care Regulatory Review document, Fall 2004.***

**#2 Special categories:**

Yes, it is necessary to maintain special categories of care for

- ski hills
- emergency care and
- childminding.

With regard to special needs child care, the research tells us that children with all levels and types of disability benefit from social and developmental experiences with their typically developing peers. With acceptance of inclusion as a key principle in quality child care, the category of special needs child care should be consolidated with group day care. All centres currently holding a special needs license could be “grandparented” in.

Staffing requirements should reflect and ensure the needs of the children are met and the necessary supports of training, equipment, physical modifications and extra staffing are funded to be available.

**#3 Programs exempt from licensing:**

This exemption should apply only where the parent/adult family member is

- immediately available at ALL times and
- a program maximum is 2 hours or less.

Child care in a shopping mall must be licensed as the adult/family member is not immediately available at all times.

We also recommend that a program that is recreational, offers a single theme, and is skill based should be exempt.

We believe that child care programs that serve children on reserve are the responsibility of the First Nations, Band Councils, not Community Care Facilities Licensing.

**#4 Multi age childcare category:**

Yes, in principle we support the creation of a new multi age child care category for group care. Such groupings could be piloted with the following conditions:

- each program is individually approved by the Medical Health Officer
- guidelines are developed for the approval process
- maximum group size is appropriately reduced
- a formula is developed to ensure appropriate staffing that reflects the group composition and the needs of the youngest children.

We recommend that provincial operating funding needs to reflect the actual costs of such a model.

## **#5 Parent Participation Preschools:**

Yes, in principle we support parents assisting in PPP's being recognized as a special category of volunteers in the regulations. This should go hand in hand with guidelines that clearly articulate:

- a definition of a PPP and
- a definition of a Parent Volunteer.

## **#6 Current ECE training and experience requirements:**

The training requirements and expectations re: continuing professional development in the current regulations should be strengthened to enhance quality. The initial ECE training is too short to adequately equip students with the education and skills they require to carry out the job responsibilities.

Given that well trained caregivers are one of the most important indicators of quality care, we recommend that government commit adequate funding to ensure that training and continuing professional development opportunities are required, accessible and affordable across the province. Publicly funded colleges should be appropriately resourced to provide training programs across BC.

We recommend increasing funding for basic training and ongoing professional development opportunities which specifically includes working with infants/toddlers, children from diverse cultures, and children who have extra support needs.

Training for all school aged care providers should be a requirement. Innovative training could be competency based where OOS providers could demonstrate competency in provision of quality inclusive child care which would include:

- a) knowledge of developmental needs of children aged 5-12;
- b) approaches to successful quality programming; and
- c) knowledge of quality environments for children aged 5-12 etc.

We recommend that training for all family child care providers should be mandatory.

We recommend that adequate public funding is needed to enhance the wages and working conditions of qualified child care providers to reflect the level of training that is required to provide quality child care and to maximize the licensee's ability to retain well trained staff.

## **#7 Requirements for ECE Assistants:**

Assistants should be clearly defined as child care providers in process of fully qualifying for their ECE certificate. A mechanism described in policy should be added to ensure that an Assistant can "open" and "close" a program at the beginning and end of each day.

## **#8 Indoor spaces requirements:**

Indoor spaces are inadequate as currently stated at 40 sq ft per child for group day care and out of school care. This question should also include pre-school.

Research specifies 50 square ft. per child provides a quality indoor environment. As BC works towards improving the quality and quantity of child care spaces to reflect the real needs of children for quality early childhood development, we recommend increasing the space requirements for:

- group care,
- pre school and
- out of school care.

We recommend these changes would need to be accompanied by adequate financial resources for non-profit child care licensees to make the facility improvements and then to maintain facility requirements.

Family child care should also be required to meet at least a minimum indoor and outdoor space requirement that enhances the provision of quality child care and reflects the intent of family child care to be provided in the family home (e.g., a basement room should not be measured and licensed for use without the children having access to the rest of the house).

## **#9 Outdoor space requirements:**

Research specifies that 100 square feet per child should be a minimum requirement. Priority should be given to increasing the amount of contiguous/adjacent space, required for group day care, out of school care, and pre-school.

These improvements to outdoor spaces would strengthen the quality of care for BC's children.

We recommend that the provincial government ensure funding to non-profit licensees that will ensure improvements and enhancements so that all outdoor spaces meet improved licensing requirements.

## **#10 Age ranges and staff ratios:**

No changes should be made to staff child ratios unless it will improve the quality of care provided to children.

Research affirms that changes to lower child:staff ratios allows for more opportunities for individual attention and positive group experiences thus improving the likelihood of quality care for the children.

We recommend that the ratio for children up to 18 months be 1:3 with sufficient public funding to cover the actual costs associated with providing quality care with staffing at this new level.

We recommend that funding reflect that the ratios in all age groupings may need to be enhanced to achieve successful inclusion of children with extra support needs.

**#11 Preschool child/staff ratios:**

Yes, we agree that the pre school staff to child ratio should be 1:10 and we recommend this change be appropriately supported with public funding to meet actual service delivery costs.

**#12 Out of School care child staff ratios:**

We recommend that across all ages in this category, the maximum group size be 30 with a staff to child ratio of 1:10. We recommend adequate public funding be provided to reflect actual service delivery costs.

**#13 Maximum hours of care:**

We recommend that the maximum hours of care per day may need to be increased to accommodate the best interests of some children and families [e.g., in order to ensure improvements in the consistency of care for children who require longer hours of care and/or to provide more opportunities for sustaining flexible child care].

We recommend such changes be accompanied by appropriate staffing and facility requirements to ensure high quality care including provision of nutritious meals, nap/rest accommodations and private, quiet spaces for the children.

**#14 Accessibility:**

Inclusion of children with disabilities will require necessary supports [e.g., training, equipment, physical modifications and extra staffing are provided for all programs], at no extra cost to parents. A child care facility should be required to modify program delivery and/or physical structures in order to meet the needs of all children. We recommend that facility adaptations to non-profit licensees should be appropriately supported with public funding.

**#15 Retention of records of children:**

Pertinent information should be kept as long as the licensee provides care.

**#16 Develop, post and practice emergency preparedness plans:**

We recommend that each licensee's policies and procedures should include emergency preparedness plans. Details re: fire, earthquake, medical emergencies and other unanticipated emergencies should be articulated in each licensee's policies.

### **#17 Walking home alone:**

Some children in out of school care programs – grade one and up – could be allowed to walk home providing there is a signed agreement, all related procedures are agreed upon between the legal guardian and the licensee, and the procedures are adhered to by the child, family and child care program.

There is a need for intermittent supervision policy guidelines to enable older responsible children to participate in some independent activity [e.g., attending a swimming lesson in an adjacent building could also be allowed]. The specific circumstances and each arrangement should be agreed upon by the licensee and the legal guardian.

### **#18 Substitute caregivers:**

If a child is going to be in the care of someone other than regular staff, we recommend that the policy and procedures be outlined detailing how/when parents will be advised. As much notification should be given as is possible. Info regarding substitute caregivers can be posted on a bulletin board for parents.

In an emergency situation, as much notice should be given to the legal guardian as possible. Appropriate documentation should be kept when substitute caregivers are brought in.

### **#19 Improving Nutrition:**

We recommend that additional public funding should be provided to ensure on site preparation of healthy nutritious foods prepared by trained staff in kitchens that meet Health By Laws. The requirements should reflect the hours of care provided to meet needs for typical meals and snacks.

### **Further Comments:**

Improvements in the design of child care facilities would enhance the quality of programs. There are currently no requirements in the regulation about child care facility design considerations such as adult support spaces [e.g., staff room, staff washrooms, staff office, parent room, conference room, kitchen laundry area, janitorial area, and storage space]. We recommend that regulations requiring attention to these and other design considerations for both indoor and outdoor spaces should be appropriately supported by public funding.

### **Coalition of Child Care Advocates of BC**

The Coalition of Child Care Advocates of BC is a voluntary, not for profit provincial organization of parents, child care providers, community organizations, unions, and interested citizens.