

Coalition of Child Care Advocates of BC Submission in response to: The Ministry of Health Discussion Forum on the Child Care Licensing Regulation

August 2002

1. The Ministry of Health seeks your comments on its plans to revise the Child Care Licensing Regulation.

B.C. has historically provided strong regulations for child care licensing. Previous governments have recognized and acted on research which clearly indicates the importance of strong regulations and the relationship to high quality care. While parents are understandably frustrated, alarmed and desperate with the lack of available spaces for their children, particularly infant and toddler care, the answer is not as simple as just allowing current providers to care for more children. No matter how attractive this option might seem, the reality of child care is that children will be put at risk with this shortsighted option. The only real answer to addressing the shortage of high quality care is to adequately fund the child care system.

2. The Ministry also welcomes your views on: thresholds for Licensing; staff to child ratios; group size; types of child care; staff qualifications; facility requirements; other ideas.

Research highlights the importance of positive early childhood experiences in determining healthy outcomes for all areas of children's development. It is time to seriously look towards creating high quality child care for all children. Any changes to licensing regulations must move us towards improvement and strengthening of that quality. The Coalition would welcome discussion regarding the improvement of quality, not the erosion of regulations.

3. What do you think the threshold for licensing should be?

While Licensed Not Required child care is used by many families, we should not confuse this kind of care with educated, licensed programs. LNR may provide caring and safe environments, but for the most part do not contribute to excellence in early childhood development. It is imperative for the safety of children that the LNR's be required to register with Child Care Resource and Referral programs and that the threshold remain at 3. We believe that stiffer penalties should apply (for example a fine) for those people who contravene this regulation. Licensing offices must be adequately staffed in order to protect children, monitor safety and shut down illegal child care.

4. For Family Child Care: What do you think the staff to child ratios should be? And what changes, if any, would you make to the current requirements for family child care.

The maximum group size and staff to child ratios in licensed family child care should remain as they currently are in BC's Regulations. As caregivers are one of the most important factors in ensuring quality care, government should commit adequate resources to ensure that adequate training and continuing professional development opportunities are a requirement and accessible for all family child care providers.

5. For Group Care: what do you think the staff to child ratios should be?

The staff to child ratios in group care should stay as they currently are in BC. Lower ratios allow more opportunities for individual attention and positive group experiences improving the likelihood of quality care for the children.

6. What changes, if any, do you think should be made to these ratios? Why?

No changes should be made to staff to child ratios unless it will positively impact on the quality of care provided to the children e.g., 1:3 for infant care.

7. What do you think the group sizes should be? Why?

The group sizes should stay as the current Regulations requires as smaller group sizes contribute to the quality of interaction between the children and the providers, a primary component of quality care. The only exception that could be considered would be in school age care where IF staff to child ratios were 1:10, the group sizes could be increased to 30 to accommodate more economical viability for school age programs. A 1:10 ratio and 30 group size would also allow for the split of the larger group into younger and older children with better staffing ratios than currently exists.

8. How many types of child care should there be? Would you combine some of these? Which ones? Would you add more?

Adding a mixed age category to the current types of care with similar small group sizes could allow some providers to meet the varied needs of families and communities.

9. What do you think the staff qualifications should be?

The training requirements and expectations re continuing professional development in the current regulations should be maintained and/or strengthened.

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.

Government must ensure that adequate funding is provided so that training is available and afforded across the province. A commitment to adequately funded training programs which include working with infants/toddlers, children from diverse cultures, and children who have extra support needs would increase accessibility so that child care providers could have basic training and access to ongoing professional development opportunities.

10. What other ideas do you have? What barriers have you encountered?

BC depends on a quality child care system in order to meet the needs of working families, parents who are attending school and for the healthy development of our children. Research is clear, for every dollar invested in child care the savings are at least 2 to one later on. Dollars committed and invested in quality early childhood programs are economically wise and contribute greatly to healthy communities/neighbourhoods.

Governments must ensure that all licensed regulated child care programs have the resources they need to meet and exceed licensing requirements. This will

depend upon inter ministerial cooperation, integrated policy development, and a commitment to child care that is funded like other public programs, through the tax system.

11. What Section(s), if any, of the current regulations is problematic? What would you do to fix it?

Any changes to Licensing and the Regulations must improve and strengthen the quality of care for BC's children. While flexibility and responsiveness are important, changes must not erode the quality of care for BC's children. DEREGULATION IS NOT THE WAY TO FIX THE SYSTEM.

DIRECTOR: COMMUNITY CARE LICENSING BRANCH
FAX# 250-952-1486

RESPONSE FROM:
Coalition of Child Care Advocates of BC
3rd Floor, 210 West Broadway
Vancouver, B.C. V5Y 3W2
Phone: 604-709-5661
Fax: 604-709-5662