

Coalition of Child Care Advocates of BC

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

3rd Floor, 210 West Broadway, Vancouver, British Columbia V5Y 3W2
tel: 604.709.5661 www.cccabc.bc.ca fax: 604.709.5662

Response to the Ministry of Children and Family Development's *Supported Child Development Program Draft Policies and Procedures Manual* March 2004

Background

On August 1, 2003 the Ministry for Children and Family Development (MCFD) issued a Discussion Paper outlining a proposal to replace the current Supported Child Care (SCC) Program with a new program, the Child Development Program (CDP). In the Ministry's own words, "The paper describes the proposed direction for a program that will be more focused on child development and family support and that will promote social inclusion for children with special needs and their families" (p.2).

In September 2003, the Coalition of Child Care Advocates of BC issued a public response to the Ministry's Discussion Paper registering our growing alarm about the implications of the proposed changes for children and families across BC. Our main concern was that the Discussion Paper ignored child care as a cornerstone of services for families whose children have extra support needs.

MCFD held consultations in a limited number of communities in BC about this Discussion Paper. While no public summary of this consultation process is available, we know that many parents and service providers were concerned that the Discussion Paper did not acknowledge the role quality child care plays in supporting children, families and inclusion.

In late January 2004, MCFD released a draft Supported Child Development Program (SCDP) Policies and Procedures Manual that is to guide the implementation of the proposed refocused program as it transitions from Supported Child Care (SCC). The Manual is the clearest public statement to date of government's plans for the refocused program, which they propose to rename the Supported Child Development Program, and will inform the practice of a wide range of people serving children who require extra supports and their families.

As part of our on-going advocacy on behalf of all children's right to access quality, inclusive child care programs, the Coalition is once again commenting on these latest developments. Our commentary does not attempt to provide a detailed analysis of the draft Manual. Rather, we focus on the key public policy issues that emerge from government's position as reflected in the draft Policy and Procedures Manual.

Child Care is back in focus!

The good news is that community input made a difference! The newly released Manual now includes a **strong focus on child care**. Specifically, the document contains the following statements that affirm the pivotal role of child care:

High quality child care promotes the health, well being and optimal development of each child within a safe, nurturing environment among his or her peers (p. 10).

The main focus will continue to be on regulated child care settings (p. 14).

The primary focus of the SCDP is to provide extra supports for children with developmental delay or disability (or risk of developmental delay) to enable them to fully participate in regulated child care settings (p. 22).

This fundamental shift speaks to the importance of providing children with special needs and their families the opportunity to be included in quality child care settings – just like other children.

The shift also speaks to the ability of the community, when we speak with one voice, to influence public policy. The submissions about the critical role of inclusive quality child care were clearly heard.

But our work is not done. The Coalition still has significant concerns about the implications of the program described in the draft Manual.

1. Lack of Adequate Resources for An Expanded Mandate

The Manual sets out a series of goals for the refocused program that are above and beyond the mandate of the current SCC program including: addressing barriers to access, supporting capacity building in the Aboriginal Community, expanding supports to a wider range of community settings and serving children who are at risk of having a developmental delay.

The Coalition fully supports these laudable goals. However, as we highlighted in our response to the initial Discussion Paper, additional services and goals require additional resources. Yet, government is offering **no additional resources to support an enhanced mandate**.

Attempts to spread the program more widely without adequate resources will lead to a dilution of services to children and families and compromise the program's ability to deliver on its own stated outcomes for children.

As the program devolves to community agencies, it will become the role of these agencies to establish funding priorities. While the Manual states that agencies must allocate the maximum amount of funds for direct service delivery, it begs the question of how direct service will be defined, how the 'maximum amount' will be established and how the agencies will fund all elements of the plan.

Without adequate resources and clear answers, government is in effect, off-loading its financial responsibilities for the provinces' most vulnerable children and families.

2. Barriers to Accessing Quality Child Care Unresolved

Attempts to fulfill the ambitious mandate of the proposed new program without extra funding will pit partners against each other in a futile bid for limited resources to provide effective service. In this equation – access to quality child care is sure to suffer.

Let us be clear. Despite the Manual's statements about the pivotal role of child care – the ability of the refocused program to support the inclusion of children in regulated child care is still **dependent on their families' ability to find and afford a quality child care space.**

Even the Manual acknowledges that families currently face significant barriers to accessing child care. This highlights the impact of reductions and restrictions to both the basic provincial Child Care Subsidy and the Special Needs Supplement and the loss of child care spaces due to recent government policies.

While these changes have made it more difficult for all moderate and low income families to access quality child care – the situation is even more critical for families whose children need extra support. These families now have to be eligible for the basic child care subsidy program before they can access the Special Needs Supplement. The reduced income eligibility levels imposed by government mean that fewer families will qualify despite the higher costs they face in raising children with extra needs.

Yet, the Manual is silent on the role that government played in creating and exacerbating these barriers and does not offer any workable solutions. Rather, the Manual suggests that it is the job of the agencies delivering the program, staff and community to identify and address these barriers – again with no increase in funding.

Under these circumstances, agencies delivering the refocused program will have little choice but to focus their limited resources on supporting inclusion in 'cheaper' community settings and programs. Regrettably, we anticipate that working parents who need child care and parents who choose licensed child care as the most appropriate setting for their child will lose out.

How long will it take this government to realize that successful inclusion in child care depends on an adequately funded, high quality child care system which ensures that the services families and children need are available and affordable?

3. The Disconnect Between Child Care and Child Development Continues

The proposed new program's inability to address the real barriers that families face in accessing child care continues to reflect a disconnect between child care and the principles of child development and early intervention. For, while child care is generally featured in a much more predominant way in the Manual than it was in the Discussion Paper, the full integration of child care is still missing from many key aspects of the plans.

For example, child care is not included in the *Principles* (pp. 11, 12) of the refocused program where, under the principle of *Evidence-Based Practice*, there are references to research on early intervention but no reference to the body of research on quality child care connecting it to positive child development outcomes. Nor does the Manual recognize that quality child care is a core component of a "comprehensive early intervention system".

The Manual states that "culturally competent community-based systems will be designed to support the participation of children representing the full range of diversity" (p. 12), but ignores the role of child care in the context of such systems and does not acknowledge that a central goal of inclusive child care has always been to provide children with such support.

Further, the *Outcomes Section* (p. 13) of the Manual is silent on child care. While there are well-defined outcomes for children, families, agencies /staff and community there are none for child care staff who provide the front line service. Building capacity in child care settings is not stressed as an outcome as it is in the current program, despite the fact that child care is featured as "a primary focus".

The expertise that currently exists within the regulated child care sector and which has been enhanced over the past few years through the capacity-building activities of SCC (provision of training, consultation and resources) has also been overlooked. In fact, the Manual seems to suggest a shift in staffing practice. Despite the articulated principle of *Shared Responsibility* (p. 11), the Manual introduces a model for a new *SCDP Support Worker* (p. 38), who will be responsible for every aspect of delivery, from supporting the child in the setting to the development and implementation of the individual service plan.

This model of a designated support worker is incompatible with true inclusion, in which all staff work with all children and extra staffing is used to enhance the setting's ability to be inclusive. A specific Support Worker can lead to a return to isolation for the child, family and staff within programs. The role of the child care staff team as the consistent on-going contact for children and families requiring extra supports needs to be

acknowledged and supported so that settings can be ready and able to welcome all children regardless of ability, culture, or need.

The problems with this staffing approach are exacerbated in the Manual's discussion of *Shared Decision-Making Model for Allocating Funding for Extra Staffing Support* (p. 21). Shockingly, child care programs are not included in the shared decision-making process although they will be the primary front line service providers and extra staff will mainly operate in those programs. The impact of the proposed Alternate Funding Model on extra staffing child care settings also remains unclear.

Given these and other remaining 'disconnects' between child care and child development, it is not surprising that government is still proposing to change the name of the program from Supported Child Care to Supported Child Development Program. If in fact government truly intended to maintain the inclusion of children in regulated child care the primary focus of the program – there would be no need for this or any other name change.

Conclusion and Recommendations

The Coalition of Child Care Advocates applauds everyone across the province who worked to put child care back at the centre of Supported Child Care. We have and can make a difference. To ensure that the words on paper move us towards real inclusion in communities, we call on the provincial government to:

Develop and implement a five year plan for a publicly funded, affordable, high quality, inclusive, comprehensive child care system that meets the needs of all BC children, including those with disabilities.

As this system is being developed, we call on the province to immediately:

1. Restore provincial funding for licensed and regulated child care and children with special needs to 2001 levels.
2. Provide SCC agencies across BC with sufficient resources to support the inclusion of children in a full range of licensed child care settings and in a range of other community activities as chosen by their families.
3. Ensure that Child Care Subsidies and the Special Needs Supplement are accessible to families who require inclusive child care for their children.
4. Defer or delay all other proposed changes, including a change in the program's name, until adequate funds to support an expanded mandate are secured and the transition to community agencies is successfully completed.