



Response to the Early Years Division, Ministry of Education regarding
proposed introduction of regulation eliminating child care wait list fees
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First, I would like to thank MPPs Peter Tabuns and Arthur Potts for introducing Private Members Bills and Kelly Doctor and Nadine Blum for initiating a petition calling for the elimination of child care wait list fees. As well, (previous) Minister of Education Liz Sandals is to be commended for responding quickly.

Second, I would like to note that the Childcare Resource and Research Unit's brief to the legislative committee on Bill 10 (November, 2014) included the following recommendation:

We are concerned with the implications of what has become a widespread practice in Ontario and elsewhere in Canada—that child care services regularly charge parents non-refundable fees to put their names on a waiting list—fees of \$50, \$100 or even more. This merely takes advantage of severe child care space shortages and offers yet one more barrier to access by low and modest income families.

We *strongly* recommend including in the legislation a clause that this practice will no longer be allowed.

Thus, it goes without saying that I am extremely supportive of the proposed speedy introduction of the proposed regulation. Specifically, I support the following points:

1. That the regulation include provisions prohibiting licensees from charging wait list fees or deposits (refundable or non -refundable) to those seeking to be added to or removed from a wait list;
2. That it require licensees to develop a wait list policy that includes a clear explanation of how the licensee determines the order in which children on a wait list are offered admission;
3. That it include details regarding how wait list status will be made available to those on the wait list in a manner that maintains privacy and confidentiality;

4. That it require licensees to include their wait list policy in their parent handbook and to provide the handbook to parents and caregivers at no cost;
5. That these requirements help support the provincial interest, articulated in section 49 of the CCEYA, to have a child care and early years system that supports the social and economic well-being of Ontarians;
6. That it come into force September 1 2016.

Third, I suggest some further additions, refinements or requirements to points 1, 2 and 3 above:

- Point 1. "Administrative fees" be added to the language of "wait list fees/deposits" to reduce the possibility of use of loopholes. It is possible that other language should be added to this point as well.
- Point 2. Provincial guidelines about what should be included in such a policy need to be developed. For example, are priority groups such as siblings, children of parents in the workplace, etc. permitted?
- Point 3. While privacy is an important value--so is transparency. I suggest that the provincial government provide guidance and requirements about how these two important elements can both be respected.

Finally, some overall comments:

1. I would like to argue that this policy change--like other policy changes--needs to be monitored and assessed so as to determine whether it "works" or needs changes;
2. I urge the Ontario government--as the first province/territory to introduce regulation to ban unfair wait list fees (which are also used in other Canadian jurisdictions)--take the lead with provincial/territorial counterparts in urging an end to wait list fees across Canada;
3. While I agree with the general "vision" stated in the Purpose section in the online consultation document, I suggest that it is time to set out a clear plan for operationalizing such a vision to--among other things--reduce the motivation for operators to charge wait list fees.

In the public and media attention to the issue of wait list fees, it has been observed repeatedly that wait list fees are merely a symptom of a profoundly unfair, inequitable child care situation that is neither accessible or affordable and is too-often of quality that is too weak to be termed "high" or "contributing to healthy development", as per the provincial vision.

With this in mind, as CRRU noted in response to Bill 10 (paraphrased):

This regulation is not sufficient for the development and sustainability of the high quality early childhood education and child care system that Ontario desperately needs. Much more is needed to even begin to address children's basic safety and protection, let alone the universal, high quality early childhood education and care that should be the hallmark of the Ontario Ministry of Education.

Ontario desperately needs such a system based on the principles of universal entitlement, high quality, and comprehensiveness. This will require not only vision and a well-designed policy framework with long-term goals, targets and timetables but also political will and ongoing sustained funding.

Now is the time to start. We urge the provincial government to begin a full policy process to develop a robust, comprehensive policy framework that lays out the province's intentions, rationales, short and long-term plans, and funding and evaluation mechanisms.

We propose the format of a traditional White Paper process, to include research, development of policy rationales and options, meaningful consultation and participation of stakeholders.

We would look forward to working with the provincial government on such a task and urge that it begin without delay.