



ONTARIO COALITION FOR  
**Better Child Care**



October 6, 2022

## **Open Letter to Ontario Premier Doug Ford regarding implementation of the Canada-Wide Early Learning and Child Care Plan**

Dear Premier Ford:

We are writing to express concerns about the direction and approach of the rollout of the Canada-Wide Early Learning and Child Care (CWELCC) Plan in Ontario. The Province's implementation has been halting and shambolic since the signing of the Canada-Ontario agreement in March 2022, creating confusion and uncertainty for parents, child care staff, service providers and municipal partners. The Province has also failed to follow through on commitments to community engagement, transparency and accountability.

We are most troubled by Ontario's change in direction with respect to for-profit child care funding. Section 4.2 of the Canada-Ontario Agreement commits Ontario to enhancing its current "cost control framework" and "ensuring that costs and earnings of child care licensees that opt-in to the Canada-Wide ELCC system are reasonable and that surplus earnings beyond reasonable earnings are directed towards improving child care services."

But in August of 2022, Ontario released revised funding guidelines that remove the entire section on undue profits and requirements for financial audits. As highlighted by federal Minister of Families, Children and Social Development Karina Gould in a recent letter to Ontario Education Minister Stephen Lecce, these changes "may run counter to the objective of ensuring the sound and reasonable use of public funds."

Additionally, this abrupt change in provincial policy direction signals that important features of the new CWELCC system can be changed suddenly and capriciously, and not in the best interests of children and families. Parents, who are forced to rely on the media for information because of the Ontario government's failure to adequately communicate, are uncertain and anxious about their fee reductions.

The child care community's alarm is compounded by the absence of promised community engagement with respect to early learning and child care policy development and implementation, especially on urgent issues such as the child care workforce crisis.

An April 12, 2022 memo to municipal child care service managers promised that:

Ontario is also working to develop a workforce strategy aimed at continuing to support improved recruitment and retention in the sector. In the spring and

summer of 2022, we will engage sector partners regarding space expansion priorities and the development of an inclusion framework to support the needs of vulnerable and diverse populations including Indigenous, Francophone, Black and other racialized, newcomer, low-income and children with special needs.

There has been no formal engagement of sector partners on a workforce strategy, space expansion or an inclusion framework.

Even basic public data are being restricted: the community is still waiting for the long overdue release of the province's *Annual Report on Early Years and Child Care 2021*, which was expected in late fall 2021. We note that the last Annual Report to be made public was released in October 2020. Accessible public data will be essential as we evaluate the successes and challenges, and work towards a comprehensive early learning and child care system for Ontario families.

We also want to express our deep disagreement with the erosion of the key role of municipalities (CMSMs and DDSABs), which has long been mandated by Ontario governments. This local government role is an important part of the infrastructure needed to support early learning and child care services through planning, financing and financial administration and quality improvement. We believe the municipal role should be strengthened, not weakened, and stress that there has been no community discussion about the role of municipalities.

The only consultation that is happening is behind closed doors. As reported in a *Toronto Star* investigative report, private invitations to a select few to serve on a Minister's Advisory Table have been made. Meetings began in August but there has been no public announcement about the choice of individuals invited or about meetings, mandate or output of this Table.

The Ontario child care community has long advocated for a publicly funded, publicly managed, high quality, universally accessible early learning and care system, as outlined in our [Roadmap to Universal Child Care in Ontario](#). We advocated that Ontario come to an agreement with the federal government and begin rolling out such a system, which will benefit families and children very significantly. We remain committed to making our vision of a transformed ELCC system a reality.

Going forward, we call on you, the Premier of Ontario, to:

- Reaffirm and act on Ontario's commitment to the spirit and requirements of the Canada-Wide Early Learning and Child Care plan;
- Respond to the federal government's recent letter by stating that Ontario will implement the cost-control and financial accountability measures outlined in the Canada-Ontario agreement as relevant to all future Funding Guidelines;
- Engage in public, open consultation on: the funding formula; a child care workforce strategy; non-profit and public expansion; and inclusion. This consultation should be an integrated process that recognizes the intrinsic connections between these facets of a child care system;

- Release the 2021 Annual Report and commit to enhancing – not restricting – ongoing public access to public data.

We call on you to act now to ensure that the implementation of the Canada-Wide Early Learning and Child Care Plan meets the needs of children, families and educators across Ontario.

Sincerely,

Carolyn Ferns, Public Policy Coordinator  
Ontario Coalition for Better Child Care  
[carolyn@childcareontario.org](mailto:carolyn@childcareontario.org)

Rachel Vickerson, Executive Director  
Association of Early Childhood Educators Ontario  
[rvickerson@aeceo.ca](mailto:rvickerson@aeceo.ca)

Morna Ballantyne, Executive Director  
Child Care Now  
[morna.ballantyne@childcarenow.ca](mailto:morna.ballantyne@childcarenow.ca)

Martha Friendly, Executive Director  
Childcare Resource and Research Unit  
[mfriendly@childcarecanada.org](mailto:mfriendly@childcarecanada.org)

CC:

Stephen Lecce, Minister of Education, Ontario

Karina Gould, Minister for Children, Families and Social Development, Government of Canada