

Sent via email: [minister.edu@ontario.ca](mailto:minister.edu@ontario.ca)  
[CCEYA\\_CONSULTATION@ontario.ca](mailto:CCEYA_CONSULTATION@ontario.ca)

August 28, 2020

The Honourable Stephen Lecce  
Minister of Education  
438 University Avenue, 5<sup>th</sup> Floor  
Toronto, Ontario M7A 2A5

Dear Minister Lecce:

The Association of Municipalities of Ontario (AMO) welcomes this opportunity to respond to the legislatively mandated review of the *Child Care and Early Years Act, 2014* (CCEYA). The Act, enacted in 2014, was an essential foundation of modernizing the child care and early years system. The legislation and its regulations were developed in consultation with AMO, municipal governments, District Social Service Administration Boards, and other sector stakeholders. Consideration of AMO's feedback for the review is appreciated and appropriate given the municipal role in Ontario. It is also timely as child care and early years programs will contribute to economic recovery from the COVID-19 emergency situation.

Overall, the CCEYA is strong, effective legislation. It explicitly recognizes and supports the role that municipal Service System Managers play and, is certainly a best practice in Canada. The Act provides an ample amount of flexibility for service system management. This should be maintained as it facilitates innovation and community responsiveness.

Any changes to the CCEYA and its regulations should be guided by a government child care and early years plan designed to maintain and expand access to affordable, safe, and high-quality licensed childcare and early years programming. In 2019, AMO submitted to the Ministry of Education a set of considerations to inform the developing plan called: "[Child Care and Early Years in Ontario: Planning for Successful Outcomes](#)". The provincial government is encouraged to continue to work with AMO and their system manager partners and municipal co-funders to jointly design and implement the plan.

It is worth considering the funding required to support the successful outcomes promoted by the legislation. Investments in child care and early years programming make good economic sense for Ontario and can aid economic recovery. They help families and communities thrive by making work possible and facilitating learning in the early formative years. In all communities, whether urban, rural or northern, child care systems help attract and retain the skilled workforce needed to grow local economies. At the same time, children can develop their potential to get their best start in life.

There is significant municipal and provincial investment in the system, with contributions from the federal government as well. This is especially true now with the substantial funding through the Safe Restart Agreement. It is appropriate given how essential child care and early years programming is to both the provincial and national economies. Child care and early

years programming has a major role to play in economic recovery and should be supported as such.

In addition to the extra COVID-19 cost coverage, maintenance of ongoing base funding levels with incremental increases, when possible, should be maintained. The decision to reduce the cap on eligible administrative costs in 2021 will increase the municipal cost-share for Consolidated Service System Managers (CMSMs) and District Social Service Administration Boards (DSSABs). The decision should be reconsidered and reversed. There should also be continuation of advocacy to the federal government to renew the Canada-Ontario bilateral agreement and follow through on the commitments made during the last federal election, and more. It is not beyond the realm of possibilities for a National Child Care Strategy.

Lastly, regarding the legislation and regulations, the Ministry is encouraged to continue to listen and carefully consider the expert technical advice from the Ontario Municipal Social Services Association (OMSSA) and the Northern Ontario Service Deliverers Association (NOSDA). Their service manager members are closest to the reality on the ground and can advise of changes particularly regarding streamlining requirements and cutting red tape in regulation and reporting. Service managers should be co-designers of the system. Discussion is also needed on how to facilitate more effective working relationships with school boards. The CCEYA mandates consultation and Ministry policies on capital funding require sign off appropriate on new child care spaces. OMSSA can continue to advise on what would make for more effective relationships.

If you have any questions regarding this submission, please feel free to contact Michael Jacek, Senior Advisor at AMO. He can be reached by telephone at 416-268-6350 or by email at [mjacek@amo.on.ca](mailto:mjacek@amo.on.ca).

Regards,



Graydon Smith  
AMO President  
Mayor of the Town of Bracebridge

cc: The Honourable Steve Clark, Minister of Municipal Affairs and Housing  
Kate Manson-Smith, Deputy Minister, Ministry of Municipal Affairs and Housing  
Nancy Naylor, Deputy Minister, Ministry of Education  
Shannon Fuller, Assistant Deputy Minister, Ministry of Education  
Dan McCormick, President, Ontario Municipal Social Services Association  
Janet Gawne, Chair, Northern Ontario Service Deliverers Association