



March 17, 2015

The Honourable Stephanie Cadieux
Minister of Children and Family Development
PO Box 9057, Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Cadieux,

I am writing to bring to your attention concerns raised at the First Call Early Childhood Development Roundtable about the provincial child care registry being developed by your Ministry. Hopefully some of these concerns will help shape the decision-making about the registry and flag potential pitfalls in its use. While it is likely you have already heard several or all of these concerns from other parties, the Roundtable provides the collective voices of people and organizations across the early years sector interested in seeing improvements aimed at addressing the crisis in access to quality early care and learning for BC's children and families.

At the systemic level, we have questions about the need for a provincial child care registry as a priority for the investment of considerable resources. What research and advice prompted the Ministry to designate a provincial registry as a priority at this time? We also understand there was to be a consultation process about the registry that would include child care providers and parents. What is the status of that consultation process, what have you learned from it, and will there be a resulting public report?

We are aware that since deciding that this registry is a government priority, ministry staff have researched other provincial models. We are particularly interested in knowing what measures have been used to evaluate the success of on-line child care registries and what data will be collected by the Ministry to evaluate the effectiveness of the BC registry.

Child care resource and referral centres (CCRRs) around the province already maintain comprehensive local child care referral databases, and are staffed by knowledgeable professionals, many of whom have multilingual skills and diverse cultural competencies. CCRR staff help parents choose the provider or program that will best suit their needs while also educating them on what constitutes quality care, assisting them with completing subsidy applications and providing them with other referral information on early childhood and parent supports, as needed. These services are provided onsite, via phone, email and outreach to reach rural and remote families. The data kept by CCRRs is matched with local Community Care Licensing data and shared with municipalities and local early childhood tables for planning purposes.

Knowing that a provincial registry cannot replicate the depth of knowledge and valuable personal service levels currently provided by CCRRs, and would duplicate existing program data collection, we are concerned that this is not the most efficient use of public dollars. What is the evidence to indicate that this project will actually improve access for families to quality child care spaces? What is the projected cost for the registry's design, set up and maintenance? Will this expenditure impact the funds available for existing programs and services?

A second level of concern is about parent access to and use of the registry. Due to limited computer access or literacy and language barriers, poverty and other reasons, there will be obstacles for many parents with respect to finding out about and using the proposed registry. Some parents, particularly those with these types of vulnerabilities, will not see the point in registering their child in this system if they already know the size of the wait lists for local programs, and/or know they cannot afford a space anyway. Low income families who are more likely to face frequent moves or lose phone or computer access at times will have trouble keeping their records up-to-date, and therefore will not be well-served by a computerized notification system. For these reasons, we are also concerned that the wait list data in a provincial registry will not be an accurate reflection of the demand for child care, particularly among families with one or more vulnerabilities, but could be used erroneously for planning purposes or decisions about public investment in child care.

Service providers and parents also have questions about the privacy protections relating to their personal data if they choose to register their child with the registry.

Child care providers have concerns about the additional workload the registry will impose on them to keep their data current. Many providers, especially smaller ones, do not have back-up administrative staff to take up this work. On the other hand, many large programs have already invested in software to manage their wait list and registration process.

Suggestions from Roundtable participants for the design of the registry include making sure parents can find out who is operating the listed child care programs; whether they are community-based, non-profit or for-profit operators, part of a commercial chain, competent in offering Aboriginal programming, and other quality considerations. Will these factors be noted on the registry?

We remind your government that the most urgent child care problems to be solved in BC are affordability, availability and quality of care. Creating an on-line child care registry is nowhere near the top of the list of systemic changes that would move BC towards addressing these issues.

We thank you for your consideration of these concerns and we look forward to receiving answers to our questions.

Sincerely,



Adrienne Montani
Provincial Coordinator

Cc: Doug Donaldson, Critic for Children and Family Development
Maurine Karagianis, Critic for Early Childhood Development
Wayne Robertson, Chair, Provincial Child Care Council
Mark Sieben, Deputy Minister, MCFD
Jonathan Barry, Director, Child Care Programs and Services