

Stojkovic, Josipa MCF:EX

From: Karim, Susan MCF:EX
Sent: July 30, 2018 1:08 PM
To: Davidson, Leah MCF:EX
Cc: Brown, Jasmin MCF:EX
Subject: FW: Request to reconsider -s.22
Attachments: CCFRI §.22 pdf

See below – s.13

s.13

There's a meeting on this tomorrow afternoon – can one of you come too?
Susan

From: Butler, Teresa MCF:EX
Sent: Monday, July 30, 2018 12:51 PM
To: Horton, Emily MCF:EX; Massey, Christine MCF:EX; Kuharic, Rhea MCF:EX; Moffat, Neahla MCF:EX
Cc: Wetherill, Anne MCF:EX; Karim, Susan MCF:EX
Subject: RE: Request to reconsider -s.22

Yes, let's please connect. I don't have the details on this either – s.13

s.13 Susan and team are working with MAIM this week on defining the policy for new providers and we could potentially include providers that haven't had a fee increase in some time in this policy as well.

I'll set something up for us to connect this week.

Thanks,

Teresa

From: Horton, Emily MCF:EX
Sent: Monday, July 30, 2018 12:43 PM
To: Massey, Christine MCF:EX; Kuharic, Rhea MCF:EX; Moffat, Neahla MCF:EX
Cc: Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX
Subject: RE: Request to reconsider -s.22

Hi – I don't have the details on how their rates changed, but this is an exception piece that we have been working on with the policy team.

Teresa/Anne – can we discuss?

Emily

Emily Horton | Executive Director
Early Years & Indigenous Early Years Policy and Programs
Early Years and Inclusion, Ministry of Children and Family Development
1-525 Superior Street | Victoria | BC
Phone: 250-413-7608 (text messages welcome)

From: Massey, Christine MCF:EX
Sent: July 30, 2018 8:44 AM
To: Kuharic, Rhea MCF:EX ; Moffat, Neahla MCF:EX
Cc: Wetherill, Anne MCF:EX ; Horton, Emily MCF:EX ; Butler, Teresa MCF:EX
Subject: FW: Request to reconsider - s.22

Rhea/Neahla - flagging that this one was also copied to the Minister and DM.

Emily/Teresa –FYI for you both re: review of CCFRI policy.s.13
s.13

From: Bond, Allison MCF:EX
Sent: Thursday, July 26, 2018 4:40 PM
To: Massey, Christine MCF:EX
Subject: FW: Request to reconsider -s.22

From: s.22
Sent: Thursday, July 26, 2018 4:04 PM
To: MCF Child Care Operating Fund, MCF:EX
Cc: Minister, MCF MCF:EX; Chuck McNeil; Bond, Allison MCF:EX; s.22
Subject: Request to reconsider -s.22

Good afternoon,
Please find attached our request to reconsider our CCFRI application, s.22
s.22 as a point of reference.

We eagerly await your response.

Sincerely,

s.22

Page 003 of 141

Withheld pursuant to/removed as

s.16

Page 004 of 141

Withheld pursuant to/removed as

s.22

Stojkovic, Josipa MCF:EX

From: Butler, Teresa MCF:EX
Sent: August 1, 2018 2:01 PM
To: Horton, Emily MCF:EX; Massey, Christine MCF:EX; Kuharic, Rhea MCF:EX; Moffat, Neahla MCF:EX
Cc: Wetherill, Anne MCF:EX; Schlatter, Alanna MCF:EX; Karim, Susan MCF:EX; Davidson, Leah MCF:EX; Brown, Jasmin MCF:EX; Cotie, Kate L MCF:EX
Subject: RE: Request to reconsider -s.22
Attachments: CCFRI Assessment and Adjudication Process_8 Apr 2018V2.pdf; CCFRI CCOF Adjudication Policy_8 Apr 2018.pdf

Hi everyone,

A group of us met on this issue today, and have identified the following next steps:
s.13

Emily – you mentioned your team wasn't as familiar with the CCFRI policy/adjudication process, so have attached the policy to this note.

Respectfully,

Teresa

From: Horton, Emily MCF:EX
Sent: Monday, July 30, 2018 12:43 PM
To: Massey, Christine MCF:EX; Kuharic, Rhea MCF:EX; Moffat, Neahla MCF:EX
Cc: Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX
Subject: RE: Request to reconsider -s.22

Hi – I don't have the details on how their rates changed, but this is an exception piece that we have been working on with the policy team.

Teresa/Anne – can we discuss?

Emily

Emily Horton | Executive Director

Early Years & Indigenous Early Years Policy and Programs
Early Years and Inclusion, Ministry of Children and Family Development
1-525 Superior Street | Victoria | BC
Phone: 250-413-7608 (text messages welcome)

From: Massey, Christine MCF:EX
Sent: July 30, 2018 8:44 AM
To: Kuharic, Rhea MCF:EX ; Moffat, Neahla MCF:EX
Cc: Wetherill, Anne MCF:EX ; Horton, Emily MCF:EX ; Butler, Teresa MCF:EX
Subject: FW: Request to reconsider -s.22

Rhea/Neahla - flagging that this one was also copied to the Minister and DM.

Emily/Teresa –FYI for you both re: review of CCFRI policy. s.13
s.13

From: Bond, Allison MCF:EX
Sent: Thursday, July 26, 2018 4:40 PM
To: Massey, Christine MCF:EX
Subject: FW: Request to reconsider - s.22

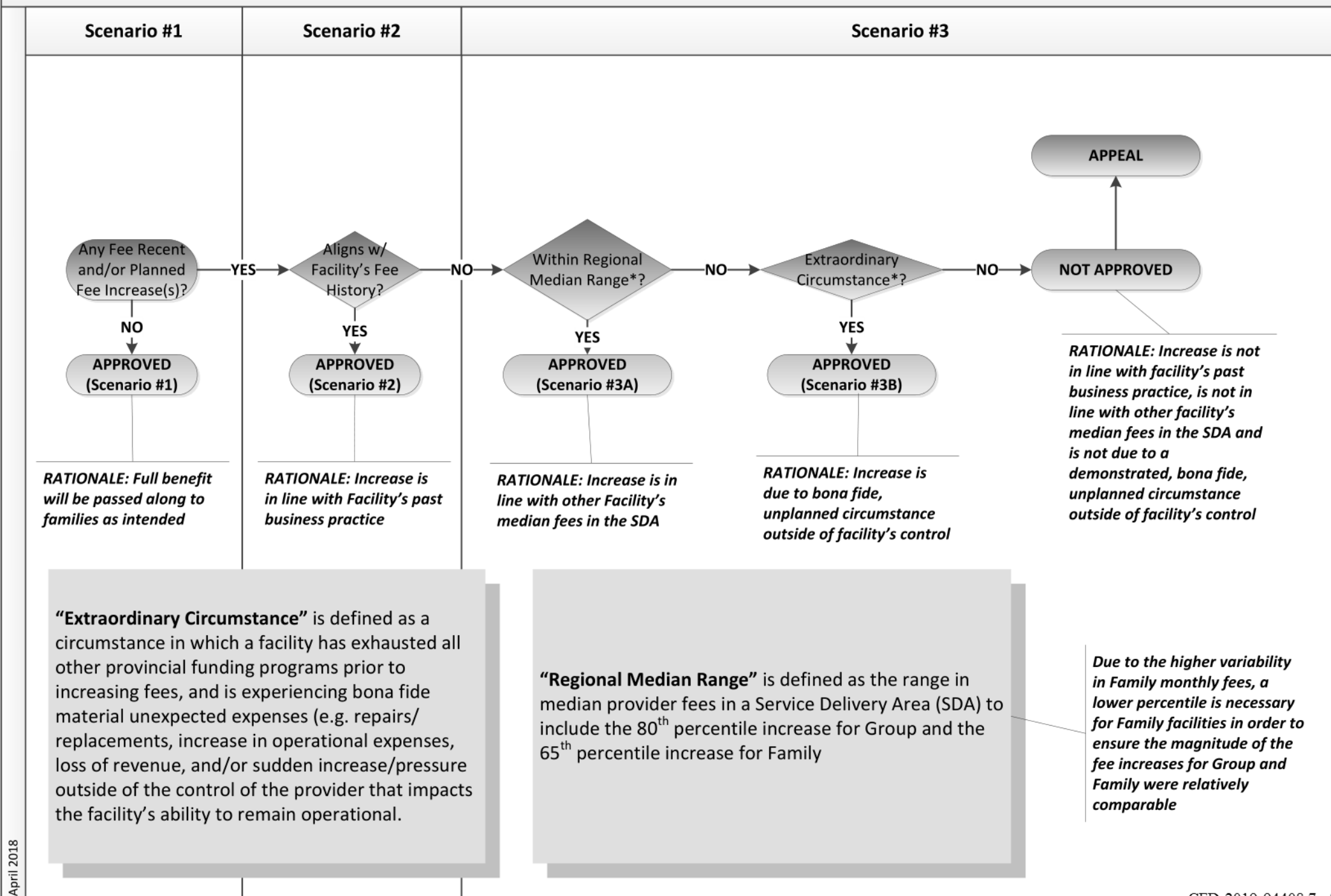
From: s.22
Sent: Thursday, July 26, 2018 4:04 PM
To: MCF Child Care Operating Fund, MCF:EX
Cc: Minister, MCF MCF:EX; Chuck McNeil; Bond, Allison MCF:EX; s.22
Subject: Request to reconsider -s.22

Good afternoon,
Please find attached our request to reconsider our CCFRI application, s.22
s.22 as a point of reference.

We eagerly await your response.

Sincerely,
s.22

CHILD CARE FEE REDUCTION INITIATIVE – ASSESSMENT & ADJUDICATION PROCESS



Page 008 of 141 to/à Page 012 of 141

Withheld pursuant to/removed as

s.13

Stojkovic, Josipa MCF:EX

From: Wetherill, Anne MCF:EX
Sent: November 19, 2018 11:24 PM
To: Mayhew, Marnie MCF:EX; Butler, Teresa MCF:EX
Cc: Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

I can set aside time tmr to review Marnie and Teresa...before noon. Marnie will keep an eye out for the doc...A

From: Mayhew, Marnie MCF:EX
Sent: Monday, November 19, 2018 5:29 PM
To: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX
Cc: Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

Tiffany advised me late today that Anne and you had a conversation today (which Anne updated Tiffany on) regarding reducing the scope of planned consultation on this...perhaps I misunderstood? Can you clarify Anne...thanks.

In terms of timelines, I will expedite and review tomorrow morning as planned but of course the urgency in timing in part depends on the agreed upon scope.

From: Butler, Teresa MCF:EX
Sent: November 19, 2018 5:23 PM
To: Mayhew, Marnie MCF:EX ; Wetherill, Anne MCF:EX
Cc: Karim, Susan MCF:EX ; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

Hi Marnie – I'm not aware of any change to the engagement approach.

It's up to you re: timelines – but I understood you were concerned about getting the necessary engagement done in November, so I thought we were in a rush to finalize the IBN so we can at least get it in front of the MA's/Ministers so Christine can start the conversation. I don't think we can wait until the briefing on Dec.7th to get approval to engage – that will be too late?

Teresa

From: Mayhew, Marnie MCF:EX
Sent: Monday, November 19, 2018 4:55 PM
To: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX
Cc: Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

I have time booked tomorrow morning to review, along with my final draft of the proposed engagement plan s.13
s.13

s.13 Please advise...

Given Krista's email with the proposed timing for the MO briefing, it doesn't appear to be a rush tonight.

Will turn my attention to it tomorrow.

Marnie

From: Butler, Teresa MCF:EX
Sent: November 19, 2018 4:53 PM
To: Mayhew, Marnie MCF:EX <Marnie.Mayhew@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>
Cc: Karim, Susan MCF:EX <Susan.Karim@gov.bc.ca>; Brown, Jasmin MCF:EX <Jasmin.Brown@gov.bc.ca>
Subject: RE: ccwg Nov 26

Yes.

Teresa

From: Mayhew, Marnie MCF:EX
Sent: Monday, November 19, 2018 4:49 PM
To: Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX
Cc: Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

Are you talking about the CCFRI engagement doc?

From: Wetherill, Anne MCF:EX
Sent: November 19, 2018 3:16 PM
To: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Mayhew, Marnie MCF:EX <Marnie.Mayhew@gov.bc.ca>
Cc: Karim, Susan MCF:EX <Susan.Karim@gov.bc.ca>; Brown, Jasmin MCF:EX <Jasmin.Brown@gov.bc.ca>
Subject: RE: ccwg Nov 26

yes

From: Butler, Teresa MCF:EX
Sent: Monday, November 19, 2018 3:12 PM
To: Wetherill, Anne MCF:EX; Mayhew, Marnie MCF:EX
Cc: Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: FW: ccwg Nov 26
Importance: High

Hi – FYI. Given the time crunch to get the consultation done, I think we need to move the IBN up as per our timelines as originally discussed. This will give Christine something to speak to when she pre-briefs the MA's. Marnie, are you still on track to get the IBN over to Anne by EOD today? And Anne, are you able to review tonight/tomorrow morning, and send it to me by noon tomorrow?

Thanks,

Teresa

From: Cain, Krista A MCF:EX
Sent: Monday, November 19, 2018 2:28 PM
To: Butler, Teresa MCF:EX; Massey, Christine MCF:EX
Cc: Cotie, Kate L MCF:EX; Karim, Susan MCF:EX; Tran, Kim C (Victoria) MCF:EX
Subject: RE: ccwg Nov 26

The briefing for the Year 2 Child Care Fee Reduction Initiative policy and engagement will be Dec 7. Let me know attendees on your end. Do you need an hour?

And you mentioned an IBN in the works for we won't route one to you.

Krista

From: Massey, Christine MCF:EX
Sent: Sunday, November 18, 2018 5:07 PM
To: Cain, Krista A MCF:EX; Butler, Teresa MCF:EX
Cc: Cotie, Kate L MCF:EX; Karim, Susan MCF:EX
Subject: RE: ccwg Nov 26

For CCWG, separate briefings are fine. A half hour will do it. Which reminds me that we need to determine which minister will speak to which deck. Can you follow up with MO? My recommendation is MKC for the Cab Sub and MSKC for the Service Delivery presentation.

For CCFRI, this needs to be a joint briefing so we'll have to wait for that one.

cm

From: Cain, Krista A MCF:EX
Sent: Friday, November 16, 2018 2:25 PM
To: Butler, Teresa MCF:EX; Massey, Christine MCF:EX
Cc: Cotie, Kate L MCF:EX; Mayhew, Marnie MCF:EX; Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

HI

Unfortunately the Ministers don't have much time between now and the 26th. The Ministers would need to be briefed separately. MKC can do 4:30pm on Tuesday the 20th or 5:00pm on Wednesday the 21st. That's about it..

Haven't heard from MSKC's office on times for her.

Is this sounding like it could work? For the Year 2 CCFRI policy can that be after next week?

Krista

From: Butler, Teresa MCF:EX
Sent: Friday, November 16, 2018 9:06 AM
To: Massey, Christine MCF:EX; Cain, Krista A MCF:EX
Cc: Cotie, Kate L MCF:EX; Mayhew, Marnie MCF:EX; Karim, Susan MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: ccwg Nov 26

If we could aim for a briefing on Thur or Fri of next week, that should be enough time for us to finish the speaking notes.

Krista – on a related note, we also need a briefing with both Ministers, also for Thur/Fri of next week on an IBN we'll be sending up on Wednesday re: Year 2 Child Care Fee Reduction Initiative policy and engagement. Maybe we could combine?

Teresa

From: Massey, Christine MCF:EX
Sent: Friday, November 16, 2018 9:00 AM
To: Cain, Krista A MCF:EX
Cc: Butler, Teresa MCF:EX
Subject: RE: ccwg Nov 26

We could do a refresher briefing with the speaking notes sometime next week, if the MOs want it. I've copied Teresa who can advise when SN would be ready.

From: Cain, Krista A MCF:EX
Sent: Friday, November 16, 2018 8:57 AM
To: Massey, Christine MCF:EX
Subject: ccwg Nov 26

Hi

Talieh called and wondered if you were briefing the ministers again before Nov 26. I didn't think so as you already briefed, but she indicated you mentioned the materials were changing. She is looking to get in on a briefing for 5 mins to brief the minister as well. If you are not, no worries as she will set something up with MO.

Are you needing more time with the Ministers?

Thanks

Krista Cain
Director, Executive Operations | Client Relations
Deputy Minister's Office
Ministry of Children and Family Development
778.698.5089

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: December 17, 2018 2:43 PM
To: Butler, Teresa MCF:EX
Cc: Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Karim, Susan MCF:EX; Brown, Jasmin MCF:EX; Mayhew, Marnie MCF:EX
Subject: RE: CCFRI 2019/20 Risks

Thanks for this further analysis. I agree that these don't seem to be show stoppers. See my further comments below in red.

cm

From: Butler, Teresa MCF:EX
Sent: Monday, December 17, 2018 10:41 AM
To: Massey, Christine MCF:EX
Cc: Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Karim, Susan MCF:EX; Brown, Jasmin MCF:EX; Mayhew, Marnie MCF:EX
Subject: FW: CCFRI 2019/20 Risks

Good morning Christine,

In follow-up to the MO briefing re: CCFRI Year 2 policy changes on Dec.7th (approved IBN attached for reference) the

s.17

Please let me know if any questions or concerns.

Respectfully,

Teresa

From: Brown, Jasmin MCF:EX
Sent: Friday, December 14, 2018 12:35 PM
To: Butler, Teresa MCF:EX
Cc: Karim, Susan MCF:EX; Darkke, Valerie MCF:EX
Subject: CCFRI 2019/20 Risks

Hi Teresa,

As discussed, here are some risks with our CCFRI year 2 strategy that were identified through discussions with the CCFRI WG, and some potential mitigation strategies:

s.13

Please let me know if you have any questions. Thanks!

Jasmin Brown | Senior Policy Analyst
Child Care Policy
Ministry of Children and Family Development
(778) 698 8426

Acknowledging with respect the Lekwungen peoples of the Songhees and Esquimalt Nations, traditional keepers of this land

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: December 19, 2018 6:55 AM
To: Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX
Cc: Mayhew, Marnie MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: CCFRI/CCOF Penalties

I am officially impressed. Thanks for this.

From: Wetherill, Anne MCF:EX
Sent: Wednesday, December 19, 2018 5:08 AM
To: Massey, Christine MCF:EX; Butler, Teresa MCF:EX
Cc: Mayhew, Marnie MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: CCFRI/CCOF Penalties

Spot on re high bar. Old news but there is precedence for CCOF and checks in place.

Fraud case \$356K , criminal court, conviction.

<https://www.timescolonist.com/news/local/comox-valley-daycare-fraudster-guilty-1.333800>

A

From: Massey, Christine MCF:EX
Sent: Thursday, December 13, 2018 3:20 PM
To: Butler, Teresa MCF:EX
Cc: Mayhew, Marnie MCF:EX; Wetherill, Anne MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: CCFRI/CCOF Penalties

Thanks. I will forward this on. s.13

s.13 It's a pretty standard clause in legislation but you need a pretty high bar to convince AG to proceed with a case.

cm

From: Butler, Teresa MCF:EX
Sent: Thursday, December 13, 2018 2:48 PM
To: Massey, Christine MCF:EX
Cc: Mayhew, Marnie MCF:EX; Wetherill, Anne MCF:EX; Brown, Jasmin MCF:EX
Subject: FW: CCFRI/CCOF Penalties

Hi Christine,

During last week's MO briefing re: Year 2 CCFRI policy, I committed to confirming the penalties under the Act and under the CCOF/CCFRI Funding Agreement for non-compliance/fraud. Jasmin has gathered this information, and also worked with Operations to gather a few stats on the number of V/A cases that have been identified this year and last.

Please let me know if you require anything further – and thank you to Jasmin for working with op's to gather this information.

Respectfully,

Teresa

From: Brown, Jasmin MCF:EX
Sent: Thursday, December 13, 2018 10:33 AM
To: Butler, Teresa MCF:EX
Subject: CCFRI/CCOF Penalties

Hi Teresa,

I've now received some information from Operations regarding the penalties under the *Child Care BC Act* and the CCOF/CCFRI Funding Agreement for facilities in contravention of the agreement.

- Under the *Child Care BC Act*, if a funding recipient supplies the Province with information that is false or misleading in order to obtain funding, the funding recipient could be subject to penalties under sections 7 and 9 of the Act, including:
 - Being required to return the overpayment to the Province, which may be through the courts or through deducting other child care funding; and,
 - Being found liable on conviction to a fine of not more than \$2,000 or to imprisonment for not more than 6 months or to both.
- Under the CCOF/CCFRI Funding Agreement, the following penalties are specified:
 - In the case of any CCFRI overpayment, the provider is required under section 4.5 of the Funding Agreement to pay the Province an amount equal to two times the amount of that overpayment;
 - In the case of any CCOF overpayment, the provider is required under section 10 of the Funding Agreement to pay the Province an amount equal to the overpayment;
 - In both cases, if the overpayment is not paid back within 30 days, the Ministry can cease all CCOF payments and payments under other child care funding programs to the provider.
- When the Operations team is made aware of providers who might have contravened the terms of their agreement, these cases are referred to Verification and Audit for review. s.17
- The program area takes every measure possible to rectify the situation prior to pursuing penalties under the agreement. Penalties are considered a last resort and the program would make every effort to work with providers to come to another resolution.

Let me know if I can clarify any point or if you need more information.

Thanks,

Jasmin Brown | Senior Policy Analyst
Child Care Policy
Ministry of Children and Family Development
(778) 698 8426

Acknowledging with respect the Lekwungen peoples of the Songhees and Esquimalt Nations, traditional keepers of this land

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: February 28, 2019 7:02 AM
To: Butler, Teresa MCF:EX; Brown, Jasmin MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Wetherill, Anne MCF:EX; Nelson, Tiffany MCF:EX; Tran, Kim C (Victoria) MCF:EX
Subject: RE: CCFRI guidelines

See below for my comments in red.

Timing for this afternoon

- 1:30pm- Letter to BCCCOA goes out first so that they get a response from us on their proposal for the CCOF contract before they get the mass email to all CCOF providers
- 2pm or later – email head's up to all CCOF providers about what is coming re: the contract and town hall (and other details – I don't know them all)

Thanks all.

From: Butler, Teresa MCF:EX
Sent: February 27, 2019 5:28 PM
To: Brown, Jasmin MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX ; Wetherill, Anne MCF:EX ; Nelson, Tiffany MCF:EX ; Massey, Christine MCF:EX
Subject: FW: CCFRI guidelines
Importance: High

Hi Jasmin,

Briefing went well. We have approval to send out the brief notification to providers tomorrow afternoon, and then the Funding Guidelines and Funding Agreement on Friday. Christine will advise around specific timing.

s.13; s.17

Anne – Christine requested we track the number of approvals due to wage increases, and report back. Will likely need to demonstrate the amount of wage increases, the amount the benefit was diluted (fee increase, etc.).

I think that covers it. Aleks/Christine – please jump in if I missed anything.

Thanks,

Teresa

From: Butler, Teresa MCF:EX
Sent: February 27, 2019 10:50 AM
To: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>
Cc: Moffat, Neahla MCF:EX <Neahla.Moffat@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Lauvaas, Kirsten GCPE:EX <Kirsten.Lauvaas@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Brown, Jasmin MCF:EX <Jasmin.Brown@gov.bc.ca>; Cotie, Kate L MCF:EX <Kate.Cotie@gov.bc.ca>
Subject: RE: CCFRI guidelines
Importance: High

Hi everyone – please find attached the final version of the CCFRI Funding Guidelines. We are hoping to release these on the website and to providers tomorrow, pending approval from Christine after she's connected w/MO re: timing/approach.

Kate – FYI, we've made a change to the exception policy to require any providers looking to raise fees due to wages to have opted in to the ECE-WE first.

Kirsten – please advise ASAP if any concerns. This version is very similar to the version I forwarded last week.

Respectfully,

Teresa

From: Brown, Jasmin MCF:EX
Sent: February 26, 2019 3:43 PM
To: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Cc: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Moffat, Neahla MCF:EX <Neahla.Moffat@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>
Subject: RE: CCFRI guidelines

Good afternoon,

I was unable to save my edits to the link below, so please find the Funding Guidelines edits attached. This includes both Neahla's edits and the recent wage-related fee increase policy changes.

Thanks!

Jasmin

From: Butler, Teresa MCF:EX
Sent: February 25, 2019 12:19 PM
To: Brown, Jasmin MCF:EX <Jasmin.Brown@gov.bc.ca>
Cc: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Moffat, Neahla MCF:EX <Neahla.Moffat@gov.bc.ca>; Nelson,

Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>

Subject: FW: CCFRI guidelines

Hi Jasmin – I know you'll be making some tweaks to the FG based on direction from Aleks/Christine (which we discussed Friday). At the same time, can you please incorporate Neahla's attached edits (to the SharePoint version), with the exception of her comment on p.9.

Neahla/Anne – if you want to make additional edits to the content as per Neahla's comments on p.11, this will need to come from operational policy ASAP as these Guidelines are supposed to be final at this point, and we are briefing the MO on Wednesday.

Respectfully,

Teresa

From: Wetherill, Anne MCF:EX

Sent: February 24, 2019 11:17 PM

To: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>

Cc: Moffat, Neahla MCF:EX <Neahla.Moffat@gov.bc.ca>

Subject: FW: CCFRI guidelines

Hi some comments in the attached from Neahla.

Can we all check in tmr on this and all comms- maybe after the 10-12 mtg?

From: Moffat, Neahla MCF:EX

Sent: Friday, February 22, 2019 6:15 PM

To: Wetherill, Anne MCF:EX

Subject: RE: CCFRI guidelines

Formatting looks a bit off, and I noticed some edits (attached for your consideration) but I wasn't sure if I should be changing anything at this point or not.

Neahla Moffat

Operations Supervisor

Child Care Benefit and Operating Funding Branch | Ministry of Children and Family Development

Office: (778) 974-2534 | Cell: (250) 882-2597

From: Butler, Teresa MCF:EX

Sent: Friday, February 22, 2019 4:18 PM

To: Nelson, Tiffany MCF:EX; Wetherill, Anne MCF:EX

Cc: Moffat, Neahla MCF:EX; Brown, Jasmin MCF:EX; Stevanovic, Aleksandra MCF:EX

Subject: RE: CCFRI guidelines

Thanks Tiffany (and Jaya). We need to make some minor edits to the wage policy as well as adding a foundational statement of intent at the front of the document, so have copied Jasmin on this.

Anne – there will be a MO briefing on this likely next Wednesday. We can't publicly release this document until after that briefing at the earliest.

Respectfully,

Teresa

From: Nelson, Tiffany MCF:EX
Sent: February 22, 2019 4:15 PM
To: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Cc: Moffat, Neahla MCF:EX <Neahla.Moffat@gov.bc.ca>
Subject: CCFRI guidelines

Hi – Jaya has desk-topped the guidelines into Word for any continued edits needed, loaded into e-app 241743. Now to who?

<https://cfdeapprovals.gov.bc.ca/prod/Documents/11109/CCFRI%20Funding%20Guidelines%2022FEB19.docx>

Thanks,

Tiffany
250 858-4680

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: March 6, 2019 9:29 AM
To: Stevanovic, Aleksandra MCF:EX
Cc: Butler, Teresa MCF:EX; Brown, Jasmin MCF:EX; Ou, Beiyan MCF:EX; Rees, Catherine J MCF:EX
Subject: RE: URGENT PLS REVIEW: FW: CCFRI wage-related fee increases

You have done some great work here. I approve this. Please prepare an IBN to update the ministers. Thx.

cm

From: Stevanovic, Aleksandra MCF:EX
Sent: March 5, 2019 6:04 PM
To: Massey, Christine MCF:EX
Cc: Butler, Teresa MCF:EX ; Brown, Jasmin MCF:EX ; Ou, Beiyan MCF:EX ; Rees, Catherine J MCF:EX
Subject: URGENT PLS REVIEW: FW: CCFRI wage-related fee increases
Importance: High

Hi Christine – we have completed the analysis and came to an agreement regarding the best approach in relation to the amount of wage increase through CCFRI issue. Need your approval to proceed. Please let us know if you'd prefer briefing – happy to arrange. This approach is reasonable, ensures the parent benefit is not extensively diluted, and linked to some relatively objective measures such as the median SDA wages and the provincial minimum wage. It is also as simple as it can be to make the CCOF staff job easier.

s.13; s.17

In terms of how this would look procedurally:

s.13

Stojkovic, Josipa MCF:EX

From: Stevanovic, Aleksandra MCF:EX
Sent: April 9, 2019 11:24 AM
To: Massey, Christine MCF:EX
Cc: Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX; Brown, Jasmin MCF:EX
Subject: FW: CCFRI next steps

From: Sommers, Sheena MCF:EX
Sent: Tuesday, April 9, 2019 11:12 AM
To: Stevanovic, Aleksandra MCF:EX
Cc: Wetherill, Anne MCF:EX
Subject: FW: CCFRI next steps

From: Wetherill, Anne MCF:EX
Sent: Tuesday, April 9, 2019 11:02 AM
To: Sommers, Sheena MCF:EX; Selinger, Alyssa MCF:EX
Subject: Fwd: CCFRI next steps

Begin forwarded message:

From: "Massey, Christine MCF:EX" <Christine.Massey@gov.bc.ca>
Date: April 9, 2019 at 10:58:26 AM PDT
To: "Wetherill, Anne MCF:EX" <Anne.Wetherill@gov.bc.ca>, "Stevanovic, Aleksandra MCF:EX" <Aleksandra.Stevanovic@gov.bc.ca>, "Butler, Teresa MCF:EX" <Teresa.Butler@gov.bc.ca>
Subject: CCFRI next steps

Anne/Aleks/Teresa – please confirm below asap. Assume that it will be forwarded far and wide.

s.13

Page 029 of 141

Withheld pursuant to/removed as

s.13

Stojkovic, Josipa MCF:EX

From: Butler, Teresa MCF:EX
Sent: April 9, 2019 1:30 PM
To: Massey, Christine MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: App E

Hi Christine,

The \$15 and \$27 represents the range of staff wages that 91% of Group staff wages fall within. The SDA median ranges from \$17.50/hr up to \$21.36/hr.

Under CCFRI policy, a facility can request a fee increase to support a wage increase for “direct care staff” which includes staff that spend 50% or more of their working time providing direct care to children, including ECEs and ECEAs.

The facility will be required to establish the business case (e.g. providing multiple sources of documentation) as to why the staff wage increase is necessary (e.g. current wage is resulting in a loss of staff to other licensed cc facilities AND creating an immediate health/safety concern under the CCLR).

As per the internal policy guidelines we discussed earlier today, there are four scenarios a facility may fall under when proposing a wage increase, as follows:

s.13

Facilities that are paying at the top of the range (e.g. \$27/hr) would fall under either scenario 1, 3 or 4.^{s.13}
s.13

Does this help? Please let me know if you'd care to discuss.

Respectfully,

Teresa

From: Massey, Christine MCF:EX
Sent: April 9, 2019 12:49 PM
To: Butler, Teresa MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX
Subject: App E

Teresa – I referred briefly to the \$27/hour wage that shows up in App E in the IBN from last week. I checked back and it is labeled “direct care staff wages”. Can you confirm? Thx!

cm

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 26, 2019 10:22 AM
To: Butler, Teresa MCF:EX
Cc: Brown, Jasmin MCF:EX
Subject: RE: policy re: new facilities

See below. With those edits, please send to GCPE and copy me. Thx!

From: Butler, Teresa MCF:EX
Sent: April 26, 2019 10:16 AM
To: Massey, Christine MCF:EX
Cc: Brown, Jasmin MCF:EX
Subject: RE: policy re: new facilities

Hi Christine,

Here are some bullets on the policy. Wanted to ensure you were ok with the content before I send to Karen. Please let me know if any questions.

s.13

This is consistent with a response we previously sent ^{s.22} anything further.

; on this topic. Please let me know if you need

Teresa

From: Johnston, Karen GCPE:EX

Sent: April 26, 2019 9:39 AM

To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>

Cc: Lauvaas, Kirsten GCPE:EX <Kirsten.Lauvaas@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>

Subject: Re: policy re: new facilities

Yes. And thanks!

Sent from my iPhone

On Apr 26, 2019, at 8:22 AM, Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca> wrote:

Karen/Kirsten – Yesterday, you mentioned that you need the response to the critic’s letter about our policy for new child care facilities^{s.22}. I’ve confirmed that the MO has not yet assigned this letter for response. So in the interim, what would be helpful on this? Some bullets on our policy?

cm

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: February 28, 2019 7:09 PM
To: Nelson, Tiffany MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX; Cotie, Kate L MCF:EX; Wetherill, Anne MCF:EX
Subject: RE: Latest funding guidelines: CCFRI, ECE-WE

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks all – great work. I have forwarded to Niki and the other M.As.

cm

From: Nelson, Tiffany MCF:EX
Sent: February 28, 2019 5:49 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Cotie, Kate L MCF:EX <Kate.Cotie@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>
Subject: Latest funding guidelines: CCFRI, ECE-WE

Hi Christine – the updated funding guidelines also attached and Niki had asked on our call to see where CCFRI landed. Note that GCPE graphics had to assist in updating the ECE-WE guidelines and will clean up final design elements in the morning (ex: exceptionally large font on stand-out pages).

Teresa notes these changes in the attached CCFRI guidelines from the earlier version you received:

- highlighted the policy intention at the top of the document,
- changed the wages exception policy (see below), and
- indicated that the exceptions policy is subject to change at our discretion.

Final wages exceptions wording:

2. Direct Care Staff Wages

The facility is implementing a fee increase(s) due to an increase(s) to:

- Wages for direct care staff that spend 50% or more of their working time providing direct care to children, including Early Childhood Educators and Early Childhood Educator Assistants; or
- Any additional expense resulting from an increase in direct care staff wages (e.g. Employer Health Tax, statutory benefits, etc.).

And the direct care staff wage increase(s) is necessary:

- As the facility's current wage(s) is resulting in loss of direct-care staff to other licensed child care facilities or an inability to hire sufficient direct-care staff; and
- As this is creating immediate health and safety concerns for the facility under the requirements of the Child Care Licensing Regulation (CCLR).

Documentation may be requested to substantiate the health and safety impact, including but not limited to expiring and non-renewable staffing exemptions granted by the local Health Authority due to an inability to recruit qualified staff, unfilled licensed spaces due to lack of staff, unplanned closures due to inability to maintain licensing ratios, multiple unfilled/unsuccessful staff position postings, etc.

Applications under this exception policy will be assessed based on the strength of the facility's business case for increasing parent fees due to wages, as evidenced by the quality of the documentation provided. The amount of the proposed wage increase may also be considered.

We will have web copy, web FAQs and stakeholder email to you ASAP tomorrow.

Thank you,

Tiffany

From: Wetherill, Anne MCF:EX

Sent: February 28, 2019 5:30 PM

To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>

Cc: Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Cotie, Kate L MCF:EX <Kate.Cotie@gov.bc.ca>; Hall, Stephanie MCF:EX <Stephanie.Hall@gov.bc.ca>; Reynolds, Elliott MCF:EX <Elliott.Reynolds@gov.bc.ca>

Subject: FW: Information about contract renewal for 2019/20 Child Care Operating Funding

For your records, the below email was sent to 3,556 currently funded CCOF organizations.

Tomorrow the web will be updated and funding agreements will be released.

Tomorrow Contract renewal has begun!

A

From: MCF Child Care Operating Fund, MCF:EX
Sent: Thursday, February 28, 2019 5:02 PM
Subject: Information about contract renewal for 2019/20 Child Care Operating Funding

Dear Organization,

Contract renewal for 2019/20 Child Care Operating Funding is about to begin!

The [CCOF webpage](#) will be updated tomorrow with new Funding Guidelines and FAQs for the Child Care Fee Reduction Initiative (CCFRI) and Early Childhood Educator Wage Enhancement (ECE-WE) and details of the improvements for 2019/20 based on feedback received over the past year.

Your 2019/20 Child Care Operating Funding Agreement will arrive in your inbox in the coming days. Once you've received your agreement, you can visit the webpage to complete the online Program Confirmation Form. This form now allows you to apply for base CCOF funding, ECE-WE and the CCFRI – all in one.

We will be hosting town halls by teleconference next week to provide you with an overview of the 2019/20 funding year and an opportunity to ask questions.

You are invited to participate in one of the following sessions:

Attendees	Session	Time	Dial In Number	Passcode
Family Providers	Tuesday, March 5	7:00-8:15 PM PST (please dial in at 6:45 PM)	s.15; s.17 (Vancouver) s.15; s.17 (Toll-free in B.C.)	s.15; s.17
Family & Group Providers	Wednesday, March 6	12:00-1:15 PM PST (please dial in at 11:45 PM)	s.15; s.17 (Vancouver) s.15; s.17 (Toll-free in B.C.)	s.15; s.17
Group Providers	Thursday, March 7	7:00-8:15 PM PST (please dial in at 6:45 PM)	s.15; s.17 (Vancouver) s.15; s.17 (Toll-free in B.C.)	s.15;

Please note: At this time, the sessions are for providers in receipt of CCOF. If you dial in and the session is full, please choose another session. Additional sessions may be added as required.

If you have any questions, program staff are available to assist you and can be reached during extended hours **between March 4th and 14th from 8:30 AM and 7:00 PM, Monday to Friday.**

Thank you,

The Child Care Benefit and Operating Funding Program
1-888-338-6622 (Option 2)

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 4, 2019 9:40 AM
To: Butler, Teresa MCF:EX; Stevanovic, Aleksandra MCF:EX
Cc: Wetherill, Anne MCF:EX
Subject: RE: Who are the heroes

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks. I won't send the BNs. I will only send the two schematics (with a caveat that we may update them for the briefing) and link to the public guidelines.

From: Butler, Teresa MCF:EX
Sent: April 4, 2019 9:21 AM
To: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>
Subject: RE: Who are the heroes

I've attached two schematics I previously prepared. This first is an overview of the entire CCFRI Assessment Process. The second dives in to the pathway for providers proposing a fee increase due to raising staff wages.

I would flag that in the overview schematic, I've included a reference to how we're defining "nominal" fee increases; however, this is what we are meeting w/operations to discuss and potentially revise this morning. So this might change.

We also have the IBN (#242433) we've been working on – it is still in draft form and w/Jasmin in eApprovals.. We are looking to finalize after a meeting this morning w/operations. I thought this was what you would use to brief the MO, instead of the previous IBN we did up?

Respectfully,

Teresa

From: Stevanovic, Aleksandra MCF:EX
Sent: April 4, 2019 9:02 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: Re: Who are the heroes

Hi - I'd refer them to the guidelines on our website and Teresa's schematic (we'll send soon). Perhaps the rest would be too much? Your call, of course

Sent from my iPhone

On Apr 4, 2019, at 8:35 AM, Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca> wrote:

The 'A' team!

Question for the 'A' team: I'd like to send something over to the MO in advance of the CCFRI briefing as a "refresher", so that we can move quickly into Stage 3 adjudication. Can I refer them to the CCFRI guidelines on our website, the attached IBNs as well as Teresa's schematic (which I don't have)? Thanks.

cm

From: Wetherill, Anne MCF:EX
Sent: April 4, 2019 8:13 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: Fwd: Who are the heroes

Totally

Think your boss probably would appreciate knowing your work is appreciated!

Cm just FYI...



Begin forwarded message:

From: "Stevanovic, Aleksandra MCF:EX" <Aleksandra.Stevanovic@gov.bc.ca>
Date: April 4, 2019 at 8:07:35 AM PDT
To: "Wetherill, Anne MCF:EX" <Anne.Wetherill@gov.bc.ca>
Cc: "Butler, Teresa MCF:EX" <Teresa.Butler@gov.bc.ca>
Subject: Re: Who are the heroes



Sent from my iPhone

On Apr 4, 2019, at 7:48 AM, Wetherill, Anne MCF:EX
<Anne.Wetherill@gov.bc.ca> wrote:

Hi you two

Rereading for the 20th time the ccfri guidelines.22 now that
we are smack in the middle of renewal..

Simple easy and helpful- at least from my internal perspective.

Will be good to hear what providers think...

You are the heroes in the guidelines story 🧑🏫💡

<241968_IBN CCFRI Adjudication of Fee Increases re Wages.pdf>

<241666_IBN_CCOF CCFRI ECE WE Funding Agreement Changes.docx>

Stojkovic, Josipa MCF:EX

From: Stevanovic, Aleksandra MCF:EX
Sent: April 5, 2019 3:24 PM
To: Ou, Beiyan MCF:EX
Cc: Butler, Teresa MCF:EX
Subject: RE: Yesterday's CCFRI briefing

Follow Up Flag: Follow up
Flag Status: Flagged

Thank you!

-----Original Message-----

From: Ou, Beiyan MCF:EX
Sent: Friday, April 5, 2019 3:09 PM
To: Stevanovic, Aleksandra MCF:EX
Cc: Butler, Teresa MCF:EX
Subject: Re: Yesterday's CCFRI briefing

Hi Aleks, please see the attached the median ECE wages by SDA for the last 3 years.

Let me know if you have questions,

Beiyan

From: Stevanovic, Aleksandra MCF:EX
Sent: April-05-19 9:42 AM
To: Ou, Beiyan MCF:EX
Cc: Butler, Teresa MCF:EX
Subject: FW: Yesterday's CCFRI briefing

Hi Beiyan - see the request and the attached. Could you send the comparisons from 2017 and 2018? Thanks

-----Original Message-----

From: Massey, Christine MCF:EX
Sent: Friday, April 5, 2019 9:41 AM
To: Stevanovic, Aleksandra MCF:EX
Subject: FW: Yesterday's CCFRI briefing

Aleks - see request. Is this something that MAIM did for us?

-----Original Message-----

From: Cain, Krista A MCF:EX
Sent: April 5, 2019 9:11 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Subject: Yesterday's CCFRI briefing

Hi Christine

The attached came from recent IBN: Child Care Fee Reduction Initiative Adjudication Policy and Procedures 241968, and Jasleen is wondering if you have comparisons from 2017 and 2018 as well?

Thanks
Krista

Krista Cain
Director, Executive Operations | Client Relations Deputy Minister's Office Ministry of Children and Family Development
778.698.5089

Stojkovic, Josipa MCF:EX

From: Stevanovic, Aleksandra MCF:EX
Sent: April 5, 2019 4:18 PM
To: Massey, Christine MCF:EX; Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX
Subject: RE: action items from yesterday's mtgs

Follow Up Flag: Follow up
Flag Status: Flagged

Policy can work on this.

From: Massey, Christine MCF:EX
Sent: Friday, April 5, 2019 4:02 PM
To: Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: RE: action items from yesterday's mtgs

One more thing to add to this list:

s.13

From: Wetherill, Anne MCF:EX
Sent: April 5, 2019 7:58 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: action items from yesterday's mtgs

s.13

A

Stojkovic, Josipa MCF:EX

From: Stevanovic, Aleksandra MCF:EX
Sent: April 8, 2019 9:16 AM
To: Karim, Susan MCF:EX; Butler, Teresa MCF:EX
Subject: FW: action items from yesterday's mtgs

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Susan, as discussed, thanks

From: Massey, Christine MCF:EX
Sent: Friday, April 5, 2019 9:38 AM
To: Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: RE: action items from yesterday's mtgs

See below.

From: Wetherill, Anne MCF:EX
Sent: April 5, 2019 7:58 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: action items from yesterday's mtgs

s.13

s.13

- s.13

-

s.13

Other action items?

Christine – ideally a meeting with them Tues or Wed would help as we need to get decisions to providers. Thanks.

A

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 8, 2019 3:59 PM
To: Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: For discussion at our 4pm call

Follow Up Flag: Follow up
Flag Status: Flagged

CCFRI

1 – Timeline –

April XX - Finalize adjudication policy

April XX - Start addressing outstanding Stage 3 adjudication

April XX – Complete Stage 3 adjudication

2 – Briefing for ministers – material

- Updated adjudication policy
- Examples of providers who clearly should/will not be approved
- Template correspondence?
- Graphic of denial process – for parents as part of comms plan

3 – Data

- Weds am on “starting point” for outstanding Stage 3 adjudication
 - o Stats including those that show whole picture of what we are seeing (profit/non-profit breakdown, family group etc) [Is this possible?]
- EOD Friday for results of the week
- Any data on requested wage increases

4- Appendix E of briefing note

5 – Comms

- GCPE – for public messaging (for fee increases under CCFRI, for providers not continuing with CCFRI)

From: Wetherill, Anne MCF:EX
Sent: April 5, 2019 7:58 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: action items from yesterday's mtgs

s.13

s.13

s.13

s.13

Other action items?

Christine – ideally a meeting with them Tues or Wed would help as we need to get decisions to providers. Thanks.

A

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 9, 2019 10:58 AM
To: Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: CCFRI next steps

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Anne/Aleks/Teresa – please confirm below asap. Assume that it will be forwarded far and wide.

s.13

- I have noted the types of information that would be helpful to assess impact and we will endeavour to provide as much as possible, for example:
 - Breakdown by type of facility (group, family, not-for-profit, for-profit)
 - What is being requested for ECE wages

April 15

- Begin communicating results. (Providers can begin to invoice on April 15th and must invoice by April 20th if they require payment by May 1st)

April 10 to 15 – Complete communications tools

- Template correspondence to providers for “denials”

- Graphic of adjudication process for parents/public communications

April 25 – finish all Stage 3 adjudication

- This leaves time to get providers paid by May 1st

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 9, 2019 12:49 PM
To: Butler, Teresa MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX
Subject: App E
Attachments: 242433_IBN_CCFRI Adjudication V3.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Teresa – I referred briefly to the \$27/hour wage that shows up in App E in the IBN from last week. I checked back and it is labeled “direct care staff wages”. Can you confirm? Thx!

cm

**MINISTRY OF CHILDREN AND FAMILY DEVELOPMENT
INFORMATION NOTE**

DATE: April 4, 2019
CLIFF#: 242433

DATE OF PREVIOUS NOTE: February 26, 2019
PREVIOUS CLIFF #: 241968

PREPARED FOR: Honourable Katrine Conroy, Minister of Children and Family Development and Honourable Katrina Chen, Minister of State for Child Care

ISSUE: Child Care Fee Reduction Initiative (CCFRI) Adjudication Policy and Procedures

BACKGROUND:

In April 2018, the Ministry of Children and Family Development launched the Child Care Fee Reduction Initiative (CCFRI), which provides licensed child care facilities with enhanced funding (up to \$350/month for infant and toddler care), which they are required to pass along to parents in the form of reduced monthly fees. Providers are invited to apply for the CCFRI when they renew their annual Child Care Operating Funding (CCOF) contract in March of each year; however, as was the case in fiscal 2018/19, providers may choose to apply to opt in at any time in 2019/20.

Providers were invited to apply to opt in to the 2019/20 contract term on March 1, 2019. As part of their application to the CCFRI, providers must report any parent fee increases they introduced in the past 12 months (that were not reported to the Ministry last year) and any parent fee increases they plan to introduce over the contract term (April 1, 2019 to March 31, 2020).

DISCUSSION:

ADJUDICATION OVERVIEW

As the purpose of the CCFRI is to enhance affordability for B.C. families, the Ministry reviews facilities' recent and proposed fee increases to ensure the greatest possible benefit is passed along to parents in the form of reduced monthly parent fees. This review is conducted through the following three adjudication stages, which considers whether:

1. **Stage 1:** The recent/proposed fee increase(s) are nominal¹, or the provider is proposing to raise their fees in line with the historical pattern of fee increases for their facility. If the recent/planned increase(s) are deemed nominal, or aligns with historical fee patterns, the facility will be approved.
2. **Stage 2:** The provider's fees are in line with the median range of parent fees for their region and the recent or proposed increase(s) are within the provincial standard range of annual increases for similar care types (i.e., \$50 for Group and \$35 for

¹ The definition of a nominal fee increase(s) is currently under development for the 2019/20 contract term. It may include a set percentage increase amount (e.g. 3-5%), a set dollar amount, or a combination of these parameters, based on the types of fee increase(s) being proposed by CCFRI providers for the 19/20 contract term.

- Family). If the recent/planned fee increase(s) align with the median range of fees, the facility will be approved.
3. **Stage 3:** The reason for any non-historical/non-standard fee increase(s) falls under the Fee Increase Exceptions Policy, outlined in the CCFRI Funding Guidelines. If the recent/planned fee increase(s) meet one or more of the policy exceptions, the facility will be approved.

STAGE 3 ADJUDICATION

If a facility has recently and/or plans to implement a fee increase(s) that is deemed non-historical/nominal and non-standard, the facility's application enters Stage 3 adjudication, during which the Ministry considers whether the fee increase(s) meets one or more of the requirements of the following four scenarios (see Appendix C for more detail):

- **Exceptional Circumstances:** the facility is experiencing material, unexpected expenses that necessitate a fee increase.
- **Direct-Care Staff Wages:** the facility is implementing a fee increase due to increases to wages for direct-care staff that are needed to address loss of staff or inability to hire sufficient staff and which pose immediate health and safety concerns under the requirements of the Child Care Licensing Regulation. In these cases, the amount of the fee increase and associated wage increase are also adjudicated (see Appendix A).
- **Priority Service Expansion:** the facility is implementing a fee increase commensurate with service expansion that meets a priority area of:
 - Providing expanded, extended, or non-traditional hours care; or,
 - Increased connection to Indigenous community, culture, or language in an Indigenous facility.
- **Affordable Child Care for Underserved Populations:** The facility has historically provided care to underserved populations at significantly below regional median rates, can demonstrate a fee increase will contribute to operational sustainability, and can demonstrate the increase will not increase the actual fees parents pay.

During Stage 3 Adjudication, facilities are required to present evidence to the Ministry that associated expenses are bona fide and material. In the case of applications falling under the Direct-Care Staff Wages scenario, the Ministry expects providers to supply multiple, material pieces of documentation that sufficiently demonstrate that not increasing wages is having or will have an immediate impact (i.e. within 12 months) on health and safety in the facility (see Appendix C for more detail).

TEMPORARY APPROVALS

On March 23, 2019, the Ministry offered temporary approval until April 30, 2019 for over 700 applications that have yet to be fully adjudicated. In cases in which providers proposed fee increases beginning in April (310 applications), the Ministry offered temporary approval on the condition that the provider agrees to postpone any fee increases until after April 30, 2019. These temporary approvals ensure stable monthly fees for parents and allow the Ministry more time to collect additional information for more complex applications. The Ministry is planning to complete the adjudication of these applications by the middle of April 2019, to allow providers enough time to claim and receive payments for May 2019.

STAGE 3 CONSIDERATIONS

CCFRI adjudication is based on the information provided by a facility to the Ministry and is conducted on a case-by-case basis. To ensure adjudication policies are applied as intended, in recognition of the current staffing crisis and to ensure existing spaces are not lost, Ministry staff may exercise limited discretion concerning the application of these policies and apply this discretion consistently to all similar applications to ensure all relevant factors are considered when approving or denying participation in the CCFRI. The intent of exercising this discretion is to balance the intended purpose of the CCFRI (e.g. enhanced parent affordability) with the pressures facing providers (e.g. lack of supply of available ECEs, etc.). The Ministry will continue to monitor the impact of its policies on provider's applications and adjust internal policies as needed.

To guide the application of Ministry discretion, confirmation is requested regarding whether fee increase(s) should be approved during Stage 3 adjudication if the increase(s):

- 1. Dilute a large proportion of the intended benefit for families (e.g. greater than 50% of the monthly fee reduction amount) if deemed necessary to sustain the ongoing operation of available spaces.**
- 2. Either fall outside of the current Fee Exception Policy (e.g. inflationary increases by providers that have not raised their fees in a certain number of years), or are due to multiple factors which fall under the Fee Exception Policy but do not necessarily hit the threshold for standard approval (e.g. a provider indicating a fee increase is necessary in order to maintain current spaces, operationalize current vacant spaces, and address program maintenance costs).**

APPLICATIONS THAT ARE NOT APPROVED

If the Ministry determines a facility's recent/proposed fee increase(s) are too high to be accepted under the CCFRI Funding Guidelines, Ministry staff will contact the provider to explain how their application was adjudicated and why the current proposed fee increase(s) will not be approved. The provider then has the opportunity to revise their application with a new (lower) fee increase and have their application re-adjudicated. If the provider chooses to not resubmit an application with revised fee increase(s), the provider will be then be notified in writing that their recent or proposed fee increase(s) is not approved under the CCFRI at this time.

As with the previous contract term, if a provider disagrees with the assessment of their facility's application for the CCFRI, that provider may contact the CCOF program to request a review of the decision to determine if there was an error in the original assessment. If the CCOF program upholds the original decision, the provider may submit a request to the CCFRI Reconsideration Committee to review the original decision. If the Reconsideration Committee upholds the original decision, the facility may not reapply (with the original proposed fee schedule) for the remainder of the contract term.

KEY MESSAGES FOR APPLICATIONS THAT ARE NOT APPROVED

- Providers that previously participated in the CCFRI during the 2018/19 contract term may continue their participation in the CCFRI with their 2018/19 fees that were previously reviewed and approved by the Ministry.

- The Ministry reviews providers' proposed fees for the 2019/20 contract term to ensure that their fees during this period remain consistent with the goal of the CCFRI to enhance child care affordability by reducing parent fees.
- If a provider chooses to raise their fees by an amount that is not approved by the Ministry for 2019/20 and chooses not to accept the reduced fee increase(s) proposed by the Ministry, they will have chosen to not participate in the CCFRI for the 2019/20 term.
- If a provider disagrees with the assessment of their facility's application for the CCFRI, that provider may contact the CCOF program to request a review of the decision to determine if there was an error in the original assessment.

NEXT STEPS:

- The Ministry will continue to adjudicate CCOF and CCFRI applications as they are received and to confirm approved facilities' enrolments as soon as possible.
- In cases in which a facility is not approved for the CCFRI due to current proposed fee increases, the Ministry will encourage the facility to reapply with revised fee increases.

ATTACHMENTS:

- CCFRI Adjudication Pathway
- CCFRI Fee Increase Exceptions Policy
- CCFRI Fee Increase Exceptions Policy – Direct Care Staff Wages
- Median ECE Wages by Service Delivery Area (SDA)
- Example Wage Increases and Estimated Impact on Fees

Contact

Assistant Deputy Minister:

*Christine Massey
Early Years and Inclusion
(778) 698-7121*

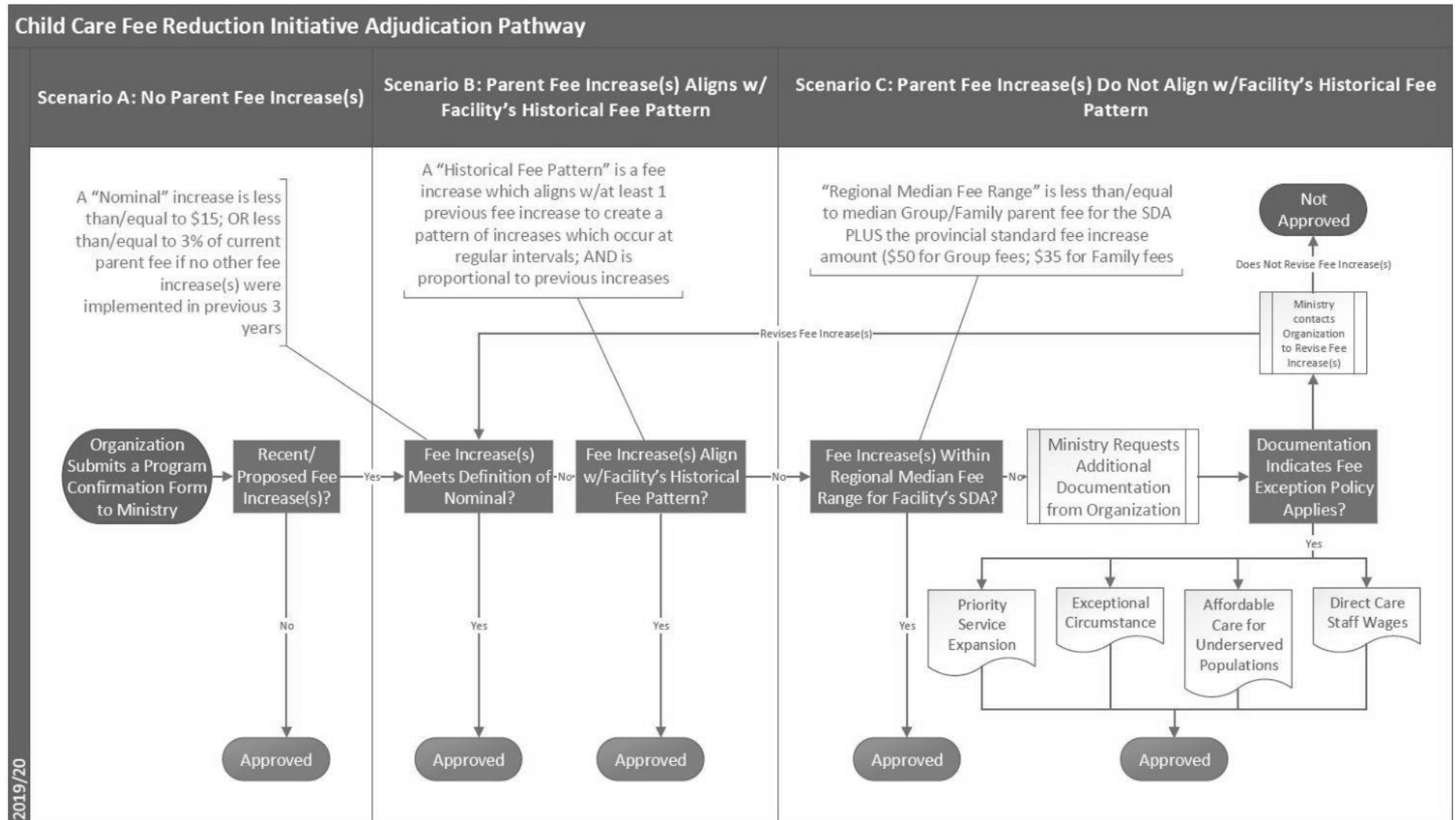
Alternate Contact for content:

*Aleksandra Stevanovic
Child Care Policy
778 698-7361*

Prepared by:

*Jasmin Brown
Child Care Policy
(778) 698 8426*

Appendix A: CCFRI Adjudication Pathway



Appendix B: Fee Increase Exceptions Policy

Facilities will be approved to enroll in the CCFRI, at the sole discretion of the Ministry, if the facility is able to demonstrate that they have exhausted all other relevant Ministry child care funding programs prior to increasing fees, and at least one of the following categories of exceptions applies:

Fee Increase Exceptions

1. Exceptional Circumstances

The facility is experiencing bona fide material unexpected expenses, including those resulting from, but not limited to:

- Sudden, unexpected, and significantly expensive maintenance, repairs, or replacement of equipment due to damage or health and safety concerns;
- A sudden and unexpected rent/lease or mortgage increase;
- A sudden and unexpected increase in operational expenses;
- A sudden and unexpected loss of revenue routinely received from a source other than parent fees or Ministry funding;
- A sudden and unexpected increase or pressure outside of the control of the facility that is impacting the facility's ability to remain operational within one calendar year (12 months); or
- Unforeseen expenses incurred by a facility operating within the first year (12 months) of business that are required for that facility to respond to operational requirements and continue to provide licensed child care.

Sudden, unexpected expenses must fall outside of the scope of the regular costs of business that are covered by routine fee increases. Consequently, these expenses must be unplanned and unforeseen, and must occur (or, in the case of ongoing expenses, begin occurring) within six months (i.e. no more than six months before or after) of the effective date of a recent or proposed parent fee increase.

2. Direct Care Staff Wages

The facility is implementing a fee increase(s) due to an increase(s) to:

- Wages for direct care staff that spend 50% or more of their working time providing direct care to children, including Early Childhood Educators and Early Childhood Educator Assistants; or
- Any additional expense resulting from an increase in direct care staff wages (e.g. Employer Health Tax, statutory benefits, etc.).

And the direct care staff wage increase(s) is necessary:

- As the facility's current wage(s) is resulting in loss of direct-care staff to other licensed child care facilities or an inability to hire sufficient direct-care staff; and
- As this is creating immediate health and safety concerns for the facility under the requirements of the Child Care Licensing Regulation (CCLR).

Documentation may be requested to substantiate the health and safety impact, including but not limited to expiring and non-renewable staffing exemptions granted by the local Health Authority due to an inability to recruit qualified staff, unfilled licensed spaces and/or unplanned closures due to inability to maintain licensing ratios, multiple unfilled/unsuccessful staff position postings, etc.

Applications under this exception policy will be assessed based on the strength of the facility's business case for increasing parent fees due to wages, as evidenced by the quality of the documentation provided. The amount of the proposed wage increase may also be considered.

PLEASE NOTE: If a proposed fee increase is due to a wage increase for direct-care ECEs eligible for ECE-WE, the facility will be required to apply for and be in receipt of the ECE-WE prior to approval for any additional proposed fee increase under the CCFRI.

3. Priority Service Expansion

The facility is implementing fee increases commensurate with service expansion, provided the service is available to all enrolled children, and meets a priority area of:

- Providing care during expanded, extended, and/or non-traditional hours²; or
- Increased connection to Indigenous community, culture, or language in an Indigenous facility or organization—i.e. a facility or organization governed by a majority (at least 51%) of Indigenous individuals (e.g. a band, a Friendship Centre, a Métis organization etc.) or an organization majority (at least 51%) owned or managed by Indigenous people. Fee increases may be in relation to expenses associated with, but not limited to:
 - Participation of an Elder, culture/language teacher, and/or family members in the child care program (e.g. transportation, honorariums, food);
 - Participation of children in community, language, and/or cultural events or activities (e.g. transportation, admission); or
 - Language or culture resources for use in the child care program.

4. Affordable Child Care for Underserved Populations

The facility meets all of the following criteria:

- Has historically provided care to underserved populations—including Indigenous or low-income populations—at significantly below the regional median range of fees for their area;
- Can demonstrate fee increases will contribute to the operational sustainability of the organization; and
- Can demonstrate fee increase will not substantively increase the actual cost of care for parents/families.

Any fee increase(s) associated with an expense covered under the Fee Increase Exceptions Policy must be proportional to that expense and must be amortized for at least one year (12 months). For larger expenses, fee increases may be required to be amortized for a longer period, as determined on a case-by-case basis.

Facilities wishing to be considered under this policy will be required to present evidence to the Ministry that such unexpected expenses are bona fide and material, and that they have sought funding from other Ministry child care funding sources prior to raising fees, where relevant.

Any parent fee increases associated with an acceptable exceptional expenditure should be proportional to that expenditure. Additionally, any fee increase requested for the same/similar reason as a previously approved fee increase must be proportional to any *additional* expense that has been incurred since any similar previous fee increase was approved.

Situations that will not be considered for exception include, but are not limited to:

- Nominal or reasonable rent/lease increases;
- Any cost increases arising from a landlord or staff member not at arm's length from the provider (e.g. a family member of the licensed provider raises the rent beyond a reasonable amount);
- Repairs that may be covered through the Childcare BC Maintenance Fund and/or other Ministry funding source(s); and
- Capacity increase that may be covered through the Childcare BC New Spaces Fund and/or other Ministry funding source(s).

² In cases in which a provider offers Extended Hours (defined as after 7 pm and before 6 am and/or overnight), the provider would be required to obtain the necessary approvals from their Health Authority and to complete a Change Notification Form in order to modify the Facility's service details as outlined in Schedule A of their CCOF Funding Agreement. Expanded hours that do not fall in the above defined range do not necessitate a modification to the CCOF Funding Agreement.

The Fee Increase Exceptions Policy is subject to change at the Ministry's discretion.

Please note that any increase in fees for part-time enrollments must be reasonably proportional to any Ministry-approved fee increase for full-time enrolments.

Appendix C: CCFRI Fee Increase Exceptions Policy – Direct Care Staff Wages

Step 1: Establish Business Case

The Ministry will request providers to supply documentation to substantiate the health and safety impact. Additionally, if a proposed fee increase is due to a wage increase for direct-care Early Childhood Educators (ECEs) eligible for the ECE Wage Enhancement (ECE-WE), the facility will be required to apply for and be in receipt of the ECE-WE prior to approval for any additional proposed fee increase under the CCFRI.

Step 2: Assess Amount of Wage Increase(s)

Once the business case has been established/approved under Step 1, the Ministry will then assess the amount of the proposed wage-related fee increase and, in some circumstances, the amount of the associated wage increase. This assessment ensures that facilities do not excessively increase staff wages at the expense of fee reduction funding intended to benefit parents.

As the intention of the CCFRI is to reduce parent fees, the Ministry first considers the amount that the proposed fee increase dilutes the parent fee reduction benefit. The Ministry will approve all fee increases that dilute 15% or less of the CCFRI monthly benefit. On the other hand, the Ministry will not approve any fee increases that dilute 50% or more of the benefit, except in cases where a facility needs to raise their current wage to meet the new minimum wage as of June 2019.

For fee increase proposals diluting greater than 15% but less than 50% of the benefit, the Ministry will consider whether the fee increase is reasonable, relative to the other wages charged in the facility's Service Delivery Area (SDA), as follows:

- Facilities paying at or below the median ECE wage in the facility's SDA will be approved to increase wages by up to a maximum increase of 7%; and
- Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by up to a maximum increase of 4%.

A higher percentage increase for facilities with below-median wages ensures the allowable wage increase is proportional among facilities. While the 4% allowable increase represents the growth in median ECE wages from 2017/18 to 2018-19, 7% represents roughly the amount required for a facility charging the provincial median ECE wage (\$19.20/hour) to increase by the difference of the minimum wage as of June 2019 and the current minimum wage (a \$1.20 difference).

In all other cases, the Ministry will only approve those portions of a proposed fee increase required to increase wages to the June 2019 minimum wage of \$13.85/hr.

If a facility is approved for an exceptional fee increase associated with increasing direct-care staff wages, the facility will be required to share this information with affected staff. Given that

each staff member may receive a different wage increase, providers are not required to share the amount of the anticipated wage increase with staff.

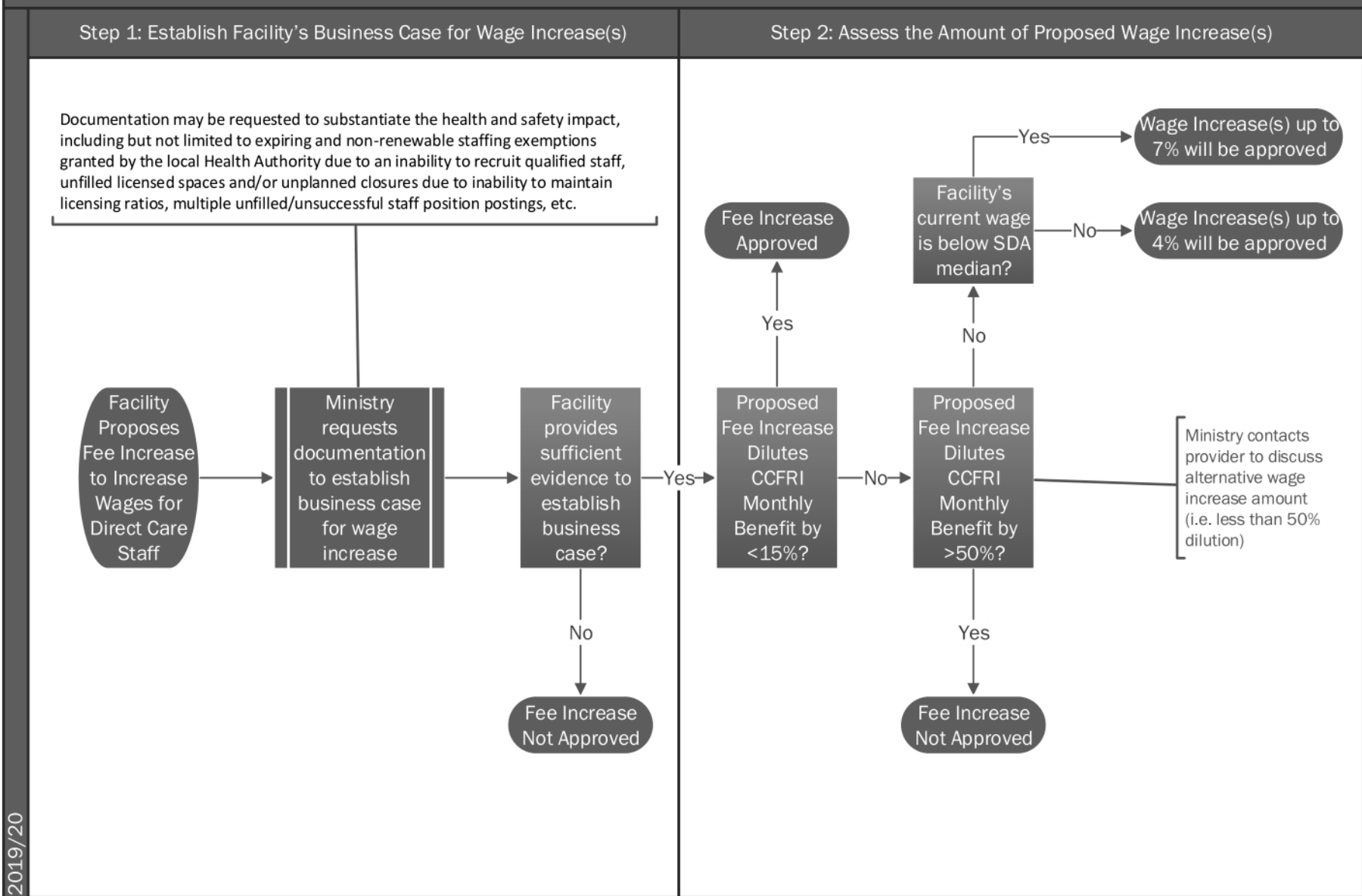
Documentation Guidelines for Wage-Related Fee Increases

In the CCFRI Funding Guidelines, providers are advised that applications for wage-related fee increases will be assessed based on the strength of the facility's business case for increasing parent fees due to wages, as evidenced by the quality of the documentation provided. The following guidelines are provided to assist adjudicators to assess the quality of the documentation.

As a general rule, the Ministry will require the provider to supply multiple, material pieces of documentation for these circumstances. In the adjudicator's opinion, the sum of this documentation must sufficiently demonstrate that not increasing wages is having or will have an immediate impact (i.e. within 12 months) on health and safety in the facility. Examples include:

- A Health Authority staffing exemption that is near to expiry at the time that the wage increase is proposed and that the adjudicator has good reason to believe cannot be renewed
- Board minutes or a letter to families stating that the facility was recently (generally, in the last three months) forced to close due to not meeting staff-to-child ratios required by their licensing office and under the CCLR
- Documentation demonstrating that child care spaces are perpetually going unfilled due to staffing issues that impact the facility's ability to meet staff-to-child ratios required by their licensing office and under the CCLR. Documentation of this may include:
 - Indication of the facility's license type and corresponding licensed capacity; and,
 - The number of staff the facility has consistently employed in the last three months.
- Multiple unfilled direct-care staff position postings

CCFRI Fee Increase Exceptions Policy – Direct Care Staff Wages



2019/20

Appendix D: Median ECE Wages by Service Delivery Area (SDA)

2018/19 Median hourly wages for staff in Group facilities with ECE certification

Service Delivery Area	Median Wages for staff with ECE certification
BC	\$19.20
Kootenays	\$18.05
Okanagan	\$19.00
Thompson Cariboo Shuswap	\$18.21
East Fraser	\$17.50
North Fraser	\$18.50
South Fraser	\$18.50
Vancouver/Richmond	\$21.07
Coast/North Shore	\$20.00
South Vancouver Island	\$20.80
North Vancouver Island	\$18.56
Northwest	\$19.44
North Central	\$17.85
Northeast	\$21.36

Appendix E: Example Wage Increases and Estimated Impact on Fees

Care type	Direct-care staff current wage	Proposed wage increase (%)	Proposed wage increase (\$)	Proposed new wage (\$)	Additional wage per month per staff member (\$)	Amount of fee increase required per child	Dilution of parent fee reduction benefit (%)
Group Under 36 Months	\$15.00	7%	\$1.05	\$16.05	\$147	\$37	11%
	\$27.00	4%	\$1.08	\$28.08	\$151	\$38	11%
	\$40.00	4%	\$1.60	\$41.60	\$224	\$56	16%
Family Under 36 Months	\$15.00	7%	\$1.05	\$16.05	\$147	\$21	11%
	\$27.00	4%	\$1.08	\$28.08	\$151	\$22	11%
	\$40.00	4%	\$1.60	\$41.60	\$224	\$32	16%
Group 3 Years to K	\$15.00	7%	\$1.05	\$16.05	\$147	\$18	18%
	\$27.00	4%	\$1.08	\$28.08	\$151	\$19	19%
	\$40.00	4%	\$1.60	\$41.60	\$224	\$28	28%
Family 3 Years to K	\$15.00	7%	\$1.05	\$16.05	\$147	\$21	35%
	\$27.00	4%	\$1.08	\$28.08	\$151	\$22	36%
	\$40.00	4%	\$1.60	\$41.60	\$224	\$32	53%

Notes

- Based on data collected through the 2018/19 Provider Profile survey of all CCOF providers.
- \$15 and \$27 represents the range of staff wages that 91% of Group staff wages fall within.
- “Additional wage per month per staff member” estimates are based on a standard 35-hour work week.
- “Amount of fee increase required per child” estimates are based on the minimum care type ratio for one ECE (e.g. one ECE for every four children in Group Under 36 Months care).

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 11, 2019 6:44 AM
To: Wetherill, Anne MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: RE: CCFRI Approved Stage 3 - Previously Conditional_aw

Follow Up Flag: Follow up
Flag Status: Flagged

Looks great. Thanks all!

cm

From: Wetherill, Anne MCF:EX
Sent: April 10, 2019 4:46 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: FW: CCFRI Approved Stage 3 - Previously Conditional_aw

Hi Christine:

Just fyi, s.22 has been approved based on historic fee increases.

She was previously conditionally approved. We are about to send out this approval email to her. The first of its kind.

Wanted to give you a heads up. Both Policy/Teresa and Jasmin and Cadence (SE) have reviewed and made edits. We await your response prior to sending, thanks.

A

From: Butler, Teresa MCF:EX
Sent: Wednesday, April 10, 2019 4:37 PM
To: Wetherill, Anne MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Brown, Jasmin MCF:EX
Subject: RE: CCFRI Approved Stage 3 - Previously Conditional_aw

Minor edits.

Teresa

From: Wetherill, Anne MCF:EX
Sent: April 10, 2019 4:29 PM
To: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>
Subject: CCFRI Approved Stage 3 - Previously Conditional_aw

Hi Teresa

Can I get your eyes on this.

Both Jasmin and Cadence have reviewed. This is an approval email for facilities who were given a conditional approval if they agreed to not implement their April 2019 fee increase. We agreed that we would have a conversation with them to see if they wanted to add the fee increase (if deemed reasonable) prorated to all the other fee increases so they would not be out the April \$.

Upon discussion, one provider agreed that they were fine to let the April \$ go and start the increase in May.

This is the approval letter acknowledging that. Can you please review.

Please note we would like to send this email today. The provider iss.22 who has been approved with a historic fee increase. Once you approve I will advise Christine that we would like to send this one.

Thx.

A

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 12, 2019 7:30 AM
To: Wetherill, Anne MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: RE: update on stage three adjudication
Attachments: CCFRI Not Approved_tb edits.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks for this detailed update.

Given how slowly adjudication is going, it seems as if the extension is the best way to go. When will you be able to provide a recommendation on how to proceed with that?

In terms of making decisions on the final adjudication policy based on a sample of initial adjudication results, it doesn't seem as if we will be in a position to have enough info on this to make a recommendation by end of day. When would we be in such a position (assuming we have more time if we can do extensions)?

I can step out of ECE conference this morning to discuss (anytime after 9:30).

I've also attached my changes to the denial letter. Is it possible to get a clean copy later this morning?

From: Wetherill, Anne MCF:EX
Sent: April 11, 2019 9:26 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: update on stage three adjudication

Hi Christine:

Training occurred yesterday for CCOF adjudicators and this morning for ACCB adjudicators. The adjudication is very slow so far taking over an hour for some files due to the complexity and learning curve. I expect it will pick up. I plan on working closely with the team tomorrow to see where and if we can simplify the process.

For OT so far, we have 10 folks for Saturday, 8 on Sunday – potentially more will sign up tomorrow.

Here is an overall breakdown of stage 3 by For Profit and Non-Profit along with the 73 adjudicated so far:

Of the 1,003 facilities in stage 3 adjudication:

- 889 (89%) are **For Profit Group and Family**
 - 461 (46%) For Profit Group
 - 428 (43%) For-Profit Family
- 114 (11%) are **Non-Profit Group**

Of the 1,003, 73 (7%) have been adjudicated to date:

- 37 (51%) did not provide enough information and need a follow-up call
- 36 (49%) provided enough information and were adjudicated:
 - 13 (36%) can be **approved as stage 1 or 2** as a result of additional information received
 - 8 (22%) can be **approved under current policy**
 - 6 under wages policy
 - 2 under extraordinary policy
 - 1 (3%) can be **approved under the revised nominal policy**
 - 14 (39%) are **not approved** under current or revised policy
 - Due to complete dilution and costs that are not covered, covered under maintenance funding, not for health and safety or reasons etc.

Timelines:

- Approximately 15 adjudicators have been trained on stage 3 and will be able to complete 5-10 stage 3 adjudications each per day depending on complexity and whether a follow-up call to providers is required and more information/evidence is required.
- This means 75-150 total stage 3 adjudications completed per day.
- All adjudications need to be completed by April 24 to be able to make the last payment run on April 25 that ensures payment before May 1. For providers to inform parents however, ideally they need notice as soon as possible.
- With 9 work days (7 weekdays plus this weekend), before April 24th, that means completion of between 675 and 1,350 total applications.
- While it is possible to adjudicate the 1,000+ stage 3 applications by April 24th, it is risky given how long it is taking and the dependency upon provider timelines for returning information. We will get a better sense at end of day tomorrow and after the weekend.
- There are several considerations:
 - A significant number of providers have submitted incomplete information in response to our Request for Information email so need to be called. The calls take time and slow down the adjudication process. Adjudication can also be delayed if the provider needs to submit evidence.
 - A number of providers may not be approved under both the current and revised policy.
- As such, **we should consider going with the option to extend temporary approvals**. This will ensure that providers will be able to advise parents of no increases in the short term and the program will not be rushed on complex stage 3 decisions and will be able to ensure administrative fairness across decisions.
- More information on the options to extend will come tomorrow thanks to the work led by Teresa/policy. We are all concerned that there are unintended or unexpected consequences that we have not yet thought of however, on the face of it, may be the best option.

Just fyi, the process is significant and involves repeated adjudications. For an application to get to stage three:

- 1) It has been **adjudicated once** to determine if it is a stage 1 or 2 approval. If not a Request for Information email is sent.
- 2) Then it is **adjudicated a second time** with the new information received. If there is not enough information, staff contact the provider for additional information.
- 3) Then a **third adjudication** occurs based on the additional information received either verbally and/or via email.
- 4) If the decision is a Not Approved, staff will call providers to advise that they will not be approved prior to an email being sent. As discussed prior, as we do not want our clerk 11's negotiating potential rates, I would recommend that clerks can advise on the call about the reconsideration process. We have found some providers choose not to raise their fees or suggest a more measured approach that would be approved. If providers chose lesser fees or request reconsideration, a **fourth adjudication** occurs.

Thanks.

Anne Wetherill, Executive Director

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Withheld pursuant to/removed as

s.13

Stojkovic, Josipa MCF:EX

From: Polden, Jaya MCF:EX
Sent: April 12, 2019 3:06 PM
To: Wetherill, Anne MCF:EX; Nelson, Tiffany MCF:EX; Butler, Teresa MCF:EX; Hall, Stephanie MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX
Subject: RE: For ADM approval: CCFRI web text

Follow Up Flag: Follow up
Flag Status: Flagged

Published.
Jaya

From: Wetherill, Anne MCF:EX
Sent: April 12, 2019 2:36 PM
To: Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Polden, Jaya MCF:EX <Jaya.Polden@gov.bc.ca>; Hall, Stephanie MCF:EX <Stephanie.Hall@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>
Subject: RE: For ADM approval: CCFRI web text

Egads the one person I needed to advise sorry cadence ccing you in

From: Wetherill, Anne MCF:EX
Sent: Friday, April 12, 2019 2:35 PM
To: Nelson, Tiffany MCF:EX; Butler, Teresa MCF:EX; Polden, Jaya MCF:EX; Hall, Stephanie MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX
Subject: FW: For ADM approval: CCFRI web text

fyi

From: Massey, Christine MCF:EX
Sent: Friday, April 12, 2019 2:24 PM
To: Wetherill, Anne MCF:EX
Subject: RE: For ADM approval: CCFRI web text

Looks good

From: Wetherill, Anne MCF:EX
Sent: April 12, 2019 2:23 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Subject: FW: For ADM approval: CCFRI web text
Importance: High

Hi Christine – you ok with yellow below?

It will go onto the webpage, on our phone tree and staff will use the wording on the phones

From: Mandybura, Cadence MCF:EX
Sent: Friday, April 12, 2019 1:28 PM
To: Wetherill, Anne MCF:EX
Cc: Nelson, Tiffany MCF:EX; Butler, Teresa MCF:EX; Polden, Jaya MCF:EX
Subject: For ADM approval: CCFRI web text
Importance: High

Hi Anne – here is the GCPE-approved web text to go into the alert box at the top of the [CCFRI page](#):

The ministry continues to adjudicate applications for the Child Care Fee Reduction Initiative as quickly as possible. We will provide an update to applicants the week of April 15.

Anne, could you confirm when Christine has approved (or if we are okay sending as an FYI only)?

Jaya, could you load this into QA so we are ready to make any final changes from Christine and then make this live?

Thank you all!

Cadence

Cadence Mandybura | Manager, Stakeholder Engagement
Ministry of Children and Family Development, Province of British Columbia
250 356-6305 (office) | 250 208-1241 (cell)
Cadence.Mandybura@gov.bc.ca

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 12, 2019 4:27 PM
To: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Nelson, Tiffany MCF:EX
Subject: for review
Attachments: CCFRI Fri Ap 12 Update.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Attached is my draft update to the MO that I need to send today. Please review and let me know if there is something I should add/correct. Thanks to everyone for the quick work today.

Page 076 of 141 to/à Page 081 of 141

Withheld pursuant to/removed as

s.13

Stojkovic, Josipa MCF:EX

From: Wetherill, Anne MCF:EX
Sent: April 15, 2019 6:31 PM
To: Massey, Christine MCF:EX; Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: RE: CCFRI IN

This note is in final – so isn't showing the minor changes I made – they are in track changes under final showing mark up
thx

From: Wetherill, Anne MCF:EX
Sent: Monday, April 15, 2019 6:29 PM
To: Massey, Christine MCF:EX; Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: FW: CCFRI IN

Hi a couple of minor edits.^{s.13}
s.13

From: Stevanovic, Aleksandra MCF:EX
Sent: Monday, April 15, 2019 6:14 PM
To: Wetherill, Anne MCF:EX
Cc: Massey, Christine MCF:EX; Butler, Teresa MCF:EX
Subject: CCFRI IN

Hi Anne – as discussed, I have attached the IN with regard to the internal CCFRI policy. Please review in particular the sections called “data analysis” and send to Christine.

Christine, this is an IN, not a DN,^{s.13}
s.13

Happy to edit further.

Aleksandra Stevanovic
Executive Director
Child Care and Inclusion Policy

Ministry of Children and Family Development

Phone: 778-698-7361

Cell: 250-514-4196

Stojkovic, Josipa MCF:EX

From: Wetherill, Anne MCF:EX
Sent: April 16, 2019 6:44 AM
To: Massey, Christine MCF:EX; Nelson, Tiffany MCF:EX
Cc: Butler, Teresa MCF:EX; Stevanovic, Aleksandra MCF:EX
Subject: RE: DRAFT notice for providers: Child Care Fee Reduction Initiative - Temporary Approval

Follow Up Flag: Follow up
Flag Status: Flagged

Hi agree – this email needs work – was thinking about it over night. We have to look at including what will happen after...

Wow your wording captured what I was thinking...NICE..

Aleks Teresa Tiffany could we connect this am. I'll book a mtg notice thx

From: Massey, Christine MCF:EX
Sent: Tuesday, April 16, 2019 6:42 AM
To: Nelson, Tiffany MCF:EX
Cc: Butler, Teresa MCF:EX; Stevanovic, Aleksandra MCF:EX; Wetherill, Anne MCF:EX
Subject: RE: DRAFT notice for providers: Child Care Fee Reduction Initiative - Temporary Approval

Reading this email again. I wonder if this statement will be clear enough to providers:

s.13

From: Nelson, Tiffany MCF:EX
Sent: April 15, 2019 5:18 PM

To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>
Subject: DRAFT notice for providers: Child Care Fee Reduction Initiative - Temporary Approval
Importance: High

Hi Christine – draft provider email is below. We will update the wording based on the final IBN. Thanks

Re: <Facility Name> <Facility ID>

s.13

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 17, 2019 10:43 AM
To: Wetherill, Anne MCF:EX; Nelson, Tiffany MCF:EX; Butler, Teresa MCF:EX
Subject: RE: CCOF/CCFRI improvements for next year

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks all!

From: Wetherill, Anne MCF:EX
Sent: April 17, 2019 10:42 AM
To: Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: RE: CCOF/CCFRI improvements for next year

A couple of edits below for consideration...

Suggested revising:
s.13

From: Nelson, Tiffany MCF:EX
Sent: Wednesday, April 17, 2019 10:24 AM
To: Massey, Christine MCF:EX; Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX
Subject: RE: CCOF/CCFRI improvements for next year

Second bullet may need to be re-worded but thought it good to define the process somewhat.

From: Massey, Christine MCF:EX
Sent: April 17, 2019 10:19 AM
To: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>
Subject: CCOF/CCFRI improvements for next year

For your input please:

Draft bullets for MSKC:

s.13

Stojkovic, Josipa MCF:EX

From: Wetherill, Anne MCF:EX
Sent: April 17, 2019 4:29 PM
To: Massey, Christine MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX; Nelson, Tiffany MCF:EX
Subject: Re: CCFRI - conditional approval - 16APR19 - DRAFT aw nm (3)

Follow Up Flag: Follow up
Flag Status: Flagged

Excellent edit to switch those two sentences Aleks! Have made that edit to both.

Massively improves flow...will send finals along with number of providers each sent to shortly.

On Apr 17, 2019, at 4:15 PM, Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca> wrote:

I'm good with it

From: Stevanovic, Aleksandra MCF:EX
Sent: April 17, 2019 4:10 PM
To: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Cc: Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Subject: RE: CCFRI - conditional approval - 16APR19 - DRAFT aw nm (3)

I added a minor edit – take it or leave it. I did it because the beginning of the letter for a quick and impatient reader originally read more like a denial than temporary approval....

From: Wetherill, Anne MCF:EX
Sent: Wednesday, April 17, 2019 3:59 PM
To: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Cc: Nelson, Tiffany MCF:EX; Massey, Christine MCF:EX
Subject: CCFRI - conditional approval - 16APR19 - DRAFT aw nm (3)

Hi Tiffany and I just reviewed this conditional approval. It aligns as much as possible with the temp approval email.

Please review and advise if good to go from your end thanks!
A

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 18, 2019 6:48 AM
To: Wetherill, Anne MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX; Nelson, Tiffany MCF:EX; Hall, Stephanie MCF:EX
Subject: RE: CCFRI Temporary and Conditional Temporary Approval emails sent to providers - April 17, 2019

Follow Up Flag: Follow up
Flag Status: Flagged

Amazing work. Thx.

From: Wetherill, Anne MCF:EX
Sent: April 17, 2019 6:52 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Hall, Stephanie MCF:EX <Stephanie.Hall@gov.bc.ca>
Subject: CCFRI Temporary and Conditional Temporary Approval emails sent to providers - April 17, 2019

Hi Christine:

Attached, please find the final CCFRI Conditional Temporary Approval and Temporary Approval email templates.

In the two hours, 783 providers were emailed a Conditional Temporary Approval or Temporary Approval:

- s.13 with non-standard fee increases in April and May 2019, received a Conditional Temporary Approval email
- s.13 with non-standard fee increases from June 2019 to March 2020, received a Temporary Approval email

Anne Wetherill, Executive Director

Child Care Benefit and Child Care Operating Funding Branch
Ministry of Children and Family Development
Office: 778-698-2093 | Cel/Text: 250-812-4898
www.gov.bc.ca/childcare

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 18, 2019 11:50 AM
To: Stevanovic, Aleksandra MCF:EX
Cc: Wetherill, Anne MCF:EX; Butler, Teresa MCF:EX; Ou, Beiyan MCF:EX
Subject: RE: CCFRI DN

Follow Up Flag: Follow up
Flag Status: Flagged

Thanks all.

Aleks – I've sent it back with a couple of questions to clarify some points. Thanks.

From: Stevanovic, Aleksandra MCF:EX
Sent: April 18, 2019 11:16 AM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Ou, Beiyan MCF:EX <Beiyan.Ou@gov.bc.ca>
Subject: CCFRI DN

Hi Christine – we have sent you a DN with CCFRI policy recommendation. s.13
s.13

s.13 Please let us know if you would like a quick briefing on this one. Thanks

Aleksandra Stevanovic

Executive Director
Child Care and Inclusion Policy
Ministry of Children and Family Development
Phone: 778-698-7361
Cell: 250-514-4196

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 18, 2019 12:49 PM
To: Barry, Jonathan MCF:EX; Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX
Cc: Davidson, Andy MCF:EX; Butler, Teresa MCF:EX; Nelson, Tiffany MCF:EX
Subject: RE: FOR REVIEW: CCFRI/Maintenance Fund Interaction/FAQ

Follow Up Flag: Follow up
Flag Status: Flagged

I found the FAQ really difficult to understand, but the bullets are clear. Can someone take another crack at it please?

From: Barry, Jonathan MCF:EX
Sent: April 18, 2019 12:11 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>
Cc: Davidson, Andy MCF:EX <Andy.Davidson@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>
Subject: RE: FOR REVIEW: CCFRI/Maintenance Fund Interaction/FAQ
Importance: High

Hi Christine,

I've reviewed and approved the FAQ below regarding CCFRI temporary approval and the Maintenance Fund. These will be used as speaking points for both Anne's shop and mine.

This process will certainly create some procedural complexities between the two programs, and perhaps delays for some providers, but we will work together to try and minimize the impacts to providers.

From: Butler, Teresa MCF:EX
Sent: Wednesday, April 17, 2019 3:24 PM
To: Barry, Jonathan MCF:EX; Wetherill, Anne MCF:EX; Stevanovic, Aleksandra MCF:EX; Nelson, Tiffany MCF:EX
Cc: Brown, Jasmin MCF:EX; Davidson, Andy MCF:EX
Subject: FOR REVIEW: CCFRI/Maintenance Fund Interaction/FAQ
Importance: High

Good afternoon,

As discussed in our call w/Christine this morning, we have prepared the following Q/A for providers that receive temporary approval and want to know how this will impact their eligibility for Maintenance Fund. Essentially, we've confirmed that:

s.13

Please advise if any edits/questions/concerns.

What does my temporary approval for the CCFRI mean for my application to the Childcare BC Maintenance Fund?

s.13

Teresa Butler, B.Ed, MPA
Director, Child Care Policy
Child Care Policy Team
Early Years and Inclusion Division
Ministry of Children & Family Development
Tel: (778) 698-9796

Acknowledging the Lekwungen People, traditional keepers of this land

This e-mail is intended only for the use of the person to whom it is addressed and may contain confidential, personal and or privileged information. Any distribution, copying or other use by anyone else is strictly prohibited. If you have received this e-mail in error, please telephone me immediately and destroy this e-mail.



Please consider the environment before printing this email.

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 18, 2019 4:43 PM
To: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX; Nelson, Tiffany MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX
Subject: RE: With edits: MO requests

Follow Up Flag: Follow up
Flag Status: Flagged

Much better – thank you!!

From: Butler, Teresa MCF:EX
Sent: April 18, 2019 4:40 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>
Subject: RE: With edits: MO requests

Hi Christine – sorry about that. I think the wording is confusing. We don't mean to say that you'll be approved to participate in the ECE-WE at some point during the term of your temporary CCFRI approval. What we mean is you will be approved for ECE-WE up until the point your temporary approval ends, at which point, you'll either be formally approved and will continue to receive ECE-WE, or you'll be denied, and your ECE-WE benefits will cease. I've reworded to make that clear below (edits in red).

Respectfully,

Teresa

From: Massey, Christine MCF:EX
Sent: April 18, 2019 4:20 PM
To: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: RE: With edits: MO requests

Can I ask to clarify this part:

s.13

cm

From: Wetherill, Anne MCF:EX
Sent: April 18, 2019 4:11 PM
To: Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>; Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>
Subject: RE: With edits: MO requests

Hi think this is good and glad you are posting to web.

Don't' need the bottom sentence – it is in the approval email already so they know...no need to repeat it.

Also presume you are adding the Maintenance FAQ as well

As soon as out, Christine one of us agreed to update MACCC as well as BCCOA...

Thank you!

From: Nelson, Tiffany MCF:EX
Sent: Thursday, April 18, 2019 4:09 PM
To: Massey, Christine MCF:EX; Wetherill, Anne MCF:EX
Cc: Stevanovic, Aleksandra MCF:EX; Butler, Teresa MCF:EX
Subject: With edits: MO requests
Importance: High

Hi – quick edits in red below, reviewed by GCPE and Teresa.

Christine, with approval we'll update the web FAQ now and I'll connect with Anne on sharing a link to it to the three groups identified.

Anne, I've attached the latest assessment flow-chart, also approved by policy and GCPE, for your review whenever free.

Thanks!

From: Butler, Teresa MCF:EX
Sent: April 18, 2019 3:16 PM
To: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>
Cc: Stevanovic, Aleksandra MCF:EX <Aleksandra.Stevanovic@gov.bc.ca>
Subject: RE: MO requests

Hi,

Here's the updated FAQ. s.13
s.13

How does this affect my application for ECE Wage Enhancement (ECE-WE)?

s.13

Teresa

From: Wetherill, Anne MCF:EX

Sent: April 18, 2019 2:52 PM

To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>; Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>

Cc: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>

Subject: RE: MO requests

Hi –

Our question was

How does this affect my application for ECE Wage Enhancement (ECE-WE)?

s.13

Teresa can you edit this –

As for q 2 – we continue to adjudicate – expect to be done April and May mid-May...then on to the rest...obviously asap...

From: Massey, Christine MCF:EX

Sent: Thursday, April 18, 2019 2:24 PM

To: Nelson, Tiffany MCF:EX; Wetherill, Anne MCF:EX

Cc: Butler, Teresa MCF:EX

Subject: MO requests

Importance: High

Can you help with the following requests arise from what we understand are questions circulating on social media:

1. Clarify eligibility for ECE –s.13

s.13

2. Timelines –s.13

s.13

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 18, 2019 5:11 PM
To: Twyford, Philip MCF:EX
Cc: Butler, Teresa MCF:EX
Subject: ECE wages and low wage redress
Attachments: 242652 DBN - CCFRI Adjudication Update April 15cm.docx

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Philip –s.13

s.13

The attached DBN describes what we are proposing to do. The MOs want to make a decision on this today or over the weekend, so please advise (or call me) when you can. Thanks.

cm

**MINISTRY OF CHILDREN AND FAMILY DEVELOPMENT
DECISION NOTE**

DATE: April 17, 2019
CLIFF#: 242652

DATE OF PREVIOUS NOTE: April 4, 2019; April 12, 2019
PREVIOUS CLIFF #: 242433; 242651

PREPARED FOR: Honourable Katrine Conroy, Minister of Children and Family Development and
Honourable Katrina Chen, Minister of State for Child Care

ISSUE: Child Care Fee Reduction Initiative (CCFRI) Adjudication Policy Update

BACKGROUND:

As of April 15, approximately 1,003 CCFRI applications are currently under adjudication that have proposed non-nominal and non-historic fee increase(s) and do not align with the range of provider fees in their area, including:

- 889 (89%) for-profit Group and Family facilities, composed of:
 - 461 (46%) for-profit Group facilities;
 - 428 (43%) for-profit Family facilities;
- 114 (11%) non-profit Group facilities.

These applications are currently undergoing Stage III adjudication, which requires the Ministry to contact the provider to request additional information to determine if one of the four fee exception policies apply: 1) Exceptional circumstances; 2) Direct care staff wages; 3) Priority Service Expansion; or 4) Affordable child care for underserved populations

Based on an initial review of these Stage III applications, there was a concern raised that a many of these applications would require more detailed adjudication, which would delay a final decision, and that some would be denied under the current policy, which would not recognize the individual circumstances of each facility and would ultimately not achieve the Ministry's goal of supporting affordable child care under the CCFRI. As such, some internal policy updates were identified, which would not require any update to the previously publicized CCFRI Funding Guidelines but would allow CCFRI adjudicators to approve a higher proportion of Stage III applications.

DISCUSSION:

To streamline adjudication and ensure the Ministry's adjudication policies are best able to respond to the individual circumstances of the applications under consideration, the following minor changes to internal adjudication policies are under consideration: 1) Revise definition of nominal fee increase; 2) Update direct care staff wage increase policy; and 3) Introduce a holistic approach to adjudication.

As these are changes to internal policies that do not affect any providers that have previously been approved for the 2019/20 contract term, the Ministry does not need to communicate these changes to providers. The following analysis is based on an **initial sample of 149 applications** that are in Stage III adjudication which provided enough information to be adjudicated. While this sample size represents roughly 15% of the total number of applications currently undergoing Stage III adjudication, there are an additional 1,095 applications that have been received to date which are pending additional information from the provider and/or have yet to be processed which will increase the total number of Stage III applications. Based on the data received/processed to date, the following analysis assumes:

1. The initial sample size of 149 is representative of the overall number of applications that will eventually be placed in Stage III adjudication; and
2. The 1,095 pending/unprocessed applications will follow the same distribution as 2,798 applications processed to date.

Based on these assumptions, out of the initial sample of 149 Stage III applications which have been adjudicated:

- 45% (67 facilities) can be approved under the current policy;
- Additional 28% (42 facilities) could be approved under the revised policy; and
- 27% (40 facilities) cannot be approved under the current or revised policy.

Based on the number of applications approved and the number of applications that would be denied under the current and proposed policy, rough estimates of the overall impact on CCFRI participation rates for 2019/20 are as follows:

- Current policy would result in approximately 3,100 facilities approved, and 650 facilities not approved
- Revised policy would result in approximately 3,500 facilities approved, and 320 facilities not approved.

Based on the adjudication process so far, upon receiving requests from staff that their requested fee increase required additional information, some providers lowered their fees. Assuming that this trend continues, the total number of facilities that will be ultimately not approved may be lower than the estimate above.

1. DISCRETION ABOVE NOMINAL AMOUNTS

The CCFRI Funding Guidelines states that nominal parent fee increases may be approved at the Ministry's sole discretion. Internally, the Ministry initially defined a nominal fee increase as:

- A fee increase (or set of increases) that over the course of a single fiscal year is equal to or less than \$15; or
- A fee increase implemented by a provider that has not increased their fees over the previous three years and is equal to or less than 3% of their current parent fee.

If a provider has requested fee increase above what is considered “nominal”, the adjudicator connects with the provider to request more information to justify the request. At this point, some providers decide to lower their requested fee increase. Ministry staff may exercise limited discretion to approve fee increases above what is defined as nominal for facilities implementing a nominal fee increase in all care types but one (e.g. fee increases are \$15 in almost all care types except for one \$20 increase in the Under 36 Months category).

Proposed Update to Definition of Nominal Increase:

To further streamline adjudication, the Ministry is considering amending the internal definition of nominal, to allow for increases of up to \$25 over the course of a single fiscal year, regardless of whether the fee increase applies to more than one care type. Increases of up to \$25/month would result the CCFRI benefit for 3 years to Kindergarten care being diluted by 42% for Family facilities, and 25% for Group facilities (see Table 1).

Data analysis

Table 1. CCFRI Benefit Dilution Rates due to Nominal Fee Increases (Current vs. Proposed)

Policy	Definition of Nominal Increases	Provider Type	Proportion of CCFRI Benefit Diluted by Maximum Nominal Increase	
			Infant/Toddler Care	3 years to School-age
Current	Increase is <\$15 annually	Group	4%	15%
		Family	8%	25%
Proposed	Increase is <\$25 annually	Group	7%	25%
		Family	13%	42%

Under the revised nominal policy, an additional 23% of Stage III applications could be approved, without further information from the provider, based on the sample (34 facilities out of 149 Stage III applications).

2. REVISED DIRECT CARE STAFF WAGES INTERNAL POLICY

In the event a facility establishes the business case to increase fees to support a wage increase for direct care staff, Ministry staff assess the amount of the proposed wage-related fee increase and, in some circumstances, the amount of the associated wage increase. This assessment ensures that facilities do not excessively increase staff wages at the expense of fee reduction funding intended to benefit parents. During this stage of analysis, the Ministry first considers the amount that the proposed fee increase dilutes the parent fee reduction benefit.

Current Internal Direct Care Staff Wages Policy:

- Once the provider has established the business case for increasing wages, the Ministry will approve fee increases that dilute 15% or less of the CCFRI monthly benefit.

- For fee increase proposals diluting greater than 15% but less than 50% of the benefit, the Ministry will consider whether the fee increase is reasonable, relative to the other wages charged in the facility's Service Delivery Area (SDA), as follows:
 - Facilities paying at or below the median ECE wage in the facility's SDA will be approved to increase wages by up to a maximum increase of 7%; and
 - Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by up to a maximum increase of 4%.
- In all other cases, the Ministry will only approve those portions of a proposed fee increase required to increase wages to the June 2019 minimum wage of \$13.85/hr. As with all fee increases approved under the Fee Increase Exceptions Policy, wage-related fee increases must be proportional to the relevant expense and must be amortized for at least one year (12 months).

While this approach allows for a higher percentage increase for increases to staff wages below the regional median, it does not fully account for the variation in wages below the median.

Proposed Internal Direct Care Staff Wages Policy:

- Once the provider has established the business case for increasing wages, the Ministry will approve all fee increases that dilute 15% or less of the CCFRI monthly benefit, without requiring additional information from the provider.
- For fee increase proposals diluting greater than 15% but less than 50% of the benefit (or less than \$50/month for Family 3 Years to Kindergarten care¹), the following will apply:
 - Facilities paying at or below the median ECE wage in the facility's SDA will be approved;
 - Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by up to a maximum increase of \$1/hour;²
 - Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by higher than \$1/hour only if the facility is under immediate (generally, within 6 months) threat of closure. In these cases, the fee increase may dilute up to 75% (or \$50/month for Family 3 Years to Kindergarten care).
- In all other cases, the Ministry will only approve those portions of a proposed fee increase required to increase wages to the June 2019 minimum wage of \$13.85/hr. As with all fee increases approved under the Fee Increase Exceptions Policy, wage-related

¹ A separate maximum amount is used for 3 Years to Kindergarten care, in recognition of the relatively low CCFRI fee reduction amount for this care type and that Family providers tend to increase fees in all care types equally. \$50 represents an 83% dilution of this fee reduction amount.

² A \$1 maximum fee increase, as opposed to a percentage maximum increase, better ensures that providers are not advantaged by paying a current wage well above the regional median. This amount is consistent with the increase to median hourly wages for ECEs between 2017/18 to 2018/19 (an \$0.81/hour increase). It is also consistent with a 4% increase to an hourly wage of \$27 (\$1.08 increase), which represents the higher end of the range of most (91%) of Group ECE wages.

fee increases must be proportional to the relevant expense and must be amortized for at least one year (12 months).

Data analysis

Under the revised policy, an additional 1% of Stage III applications could be approved based on the sample (1 facility out of 149 Stage III applications).

3. HOLISTIC APPROACH

Currently, the CCFRI Funding Guidelines are silent on whether the Ministry will accept applications meeting multiple adjudication criteria or scenarios. For example, a provider may propose a fee increase that is partially in line with the facility's historical pattern, partially due to an exceptional circumstance, and partially due to a wage increase.

The Ministry is considering the adoption of an internal policy that clarifies that adjudication can reflect a holistic approach that accounts for multiple reasons for a fee increase. In all cases, the portion of the fee increase covered under the Fee Increase Exceptions Policy must be proportional to any associated expenses and must be amortized over at least 12 months.

Data analysis

Under the revised policy, an additional 5% of Stage III applications could be approved based on the sample (7 facilities out of 149 Stage III applications).

OPTIONS:

s.13

RECOMMENDATION:

s.13

DECISION and SIGNATURE
Honourable Katrine Conroy

DATE SIGNED

DECISION and SIGNATURE

Honourable Katrina Chen
Minister of State for Child Care

DATE SIGNED

Attachments:

A. N/A

Contact

Assistant Deputy Minister:

Christine Massey
Early Years and Inclusion

s.17

Alternate Contact

for content:

Aleksandra Stevanovic
Child Care Policy

s.17

Prepared by:

Teresa Butler
Child Care Policy

s.17

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 18, 2019 6:19 PM
To: Viaud, Chantille MCF:EX; Gunn, Paula MCF:EX
Cc: Lapthorne, Carmen MCF:EX; Butler, Teresa MCF:EX
Subject: Revised DBN
Attachments: 242652 DBN - CCFRI Adjudication Update April 15cm.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Chantille/Paula – as discussed, attached is the revised DBN for consideration by ministers.

cm

**MINISTRY OF CHILDREN AND FAMILY DEVELOPMENT
DECISION NOTE**

DATE: April 17, 2019
CLIFF#: 242652

DATE OF PREVIOUS NOTE: April 4, 2019; April 12, 2019
PREVIOUS CLIFF #: 242433; 242651

PREPARED FOR: Honourable Katrine Conroy, Minister of Children and Family Development and
Honourable Katrina Chen, Minister of State for Child Care

ISSUE: Child Care Fee Reduction Initiative (CCFRI) Adjudication Policy Update

BACKGROUND:

As of April 15, approximately 1,003 CCFRI applications are currently under adjudication that have proposed non-nominal and non-historic fee increase(s) and do not align with the range of provider fees in their area, including:

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These applications are currently undergoing Stage III adjudication, which requires the Ministry to contact the provider to request additional information to determine if one of the four fee exception policies apply: 1) Exceptional circumstances; 2) Direct care staff wages; 3) Priority Service Expansion; or 4) Affordable child care for underserved populations

DISCUSSION:

To streamline adjudication and ensure the Ministry's adjudication policies are best able to respond to the individual circumstances of the applications under consideration, a change to the definition of a nominal fee increase is proposed. This change would not affect any providers that have previously been approved for the 2019/20 contract term, and, as this is internal policy, the Ministry does not need to communicate these changes to providers.

The CCFRI Funding Guidelines state that nominal parent fee increases may be approved at the Ministry's sole discretion. Internally, the Ministry initially defined a nominal fee increase as:

- A fee increase (or set of increases) that over the course of a single fiscal year is equal to or less than \$15; or
- A fee increase implemented by a provider that has not increased their fees over the previous three years and is equal to or less than 3% of their current parent fee.

If a provider has requested a fee increase above what is considered "nominal", the adjudicator connects with the provider to request more information to justify the request. At this point,

some providers decide to lower their requested fee increase. Ministry staff may exercise limited discretion to approve fee increases above what is defined as nominal for facilities implementing a nominal fee increase in all care types but one (e.g. fee increases are \$15 in almost all care types except for one \$20 increase in the Under 36 Months category).

Proposed Update to Definition of Nominal Increase:

To further streamline adjudication, the Ministry is considering amending the internal definition of nominal, to allow for increases of up to \$25 over the course of a single fiscal year, regardless of whether the fee increase applies to more than one care type. Increases of up to \$25/month would result the CCFRI benefit for 3 years to Kindergarten care being diluted by 42% for Family facilities, and 25% for Group facilities (see Table 1).

Data analysis

The following analysis is based on an **initial sample of 149 applications** that are in Stage III adjudication which provided enough information to be adjudicated. While this sample size represents roughly 15% of the total number of applications currently undergoing Stage III adjudication, there are an additional 1,095 applications that have been received to date which are pending additional information from the provider and/or have yet to be processed which will increase the total number of Stage III applications. Based on the data received/processed to date, the following analysis assumes:

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Proposed	Increase is <\$25 annually	Group	7%	25%
		Family	13%	42%

Under the revised nominal policy, an additional 23% of Stage III applications could be approved, without further information from the provider, based on the sample (34 facilities out of 149 Stage III applications).

OPTIONS:

s.13

RECOMMENDATION:

s.13

_____/_____
DECISION and SIGNATURE
Honourable Katrine Conroy
Minister of Children & Family Development

DATE SIGNED

_____/_____
DECISION and SIGNATURE
Honourable Katrina Chen
Minister of State for Child Care

DATE SIGNED

Contact
Assistant Deputy Minister:
Christine Massey
Early Years and Inclusion
s.17

Alternate Contact
for content:
Aleksandra Stevanovic
Child Care Policy
s.17

Prepared by:
Teresa Butler
Child Care Policy
s.17

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 23, 2019 9:33 AM
To: Walker, Leah MCF:EX
Cc: Tran, Kim C (Victoria) MCF:EX; Butler, Teresa MCF:EX; Twyford, Philip MCF:EX
Subject: ECE wages
Attachments: 242652 DBN - CCFRI Adjudication Update April 15.docx

Follow Up Flag: Follow up
Flag Status: Flagged

Leah – is it possible to get a half hour with Allison this afternoon on the above? Please include me and Teresa.
Background attached.
Philip – do you want to be included?

cm

**MINISTRY OF CHILDREN AND FAMILY DEVELOPMENT
DECISION NOTE**

DATE: April 17, 2019
CLIFF#: 242652

DATE OF PREVIOUS NOTE: April 4, 2019; April 12, 2019
PREVIOUS CLIFF #: 242433; 242651

PREPARED FOR: Honourable Katrine Conroy, Minister of Children and Family Development and
Honourable Katrina Chen, Minister of State for Child Care

ISSUE: Child Care Fee Reduction Initiative (CCFRI) Adjudication Policy Update

BACKGROUND:

As of April 15, approximately 1,003 CCFRI applications are currently under adjudication that have proposed non-nominal and non-historic fee increase(s) and do not align with the range of provider fees in their area, including:

- 889 (89%) for-profit Group and Family facilities, composed of:
 - 461 (46%) for-profit Group facilities;
 - 428 (43%) for-profit Family facilities;
- 114 (11%) non-profit Group facilities.

These applications are currently undergoing Stage III adjudication, which requires the Ministry to contact the provider to request additional information to determine if one of the four fee exception policies apply: 1) Exceptional circumstances; 2) Direct care staff wages; 3) Priority Service Expansion; or 4) Affordable child care for underserved populations

Based on an initial review of these Stage III applications, there was a concern raised that a many of these applications would require more detailed adjudication, which would delay a final decision, and that some would be denied under the current policy, which would not recognize the individual circumstances of each facility and would ultimately not achieve the Ministry's goal of supporting affordable child care under the CCFRI. As such, some internal policy updates were identified, which would not require any update to the previously publicized CCFRI Funding Guidelines but would allow CCFRI adjudicators to approve a higher proportion of Stage III applications.

DISCUSSION:

To streamline adjudication and ensure the Ministry's adjudication policies are best able to respond to the individual circumstances of the applications under consideration, the following minor changes to internal adjudication policies are under consideration: 1) Revise definition of nominal fee increase; 2) Update direct care staff wage increase policy; and 3) Introduce a holistic approach to adjudication.

As these are changes to internal policies that do not affect any providers that have previously been approved for the 2019/20 contract term, the Ministry does not need to communicate these changes to providers. The following analysis is based on an **initial sample of 149 applications** that are in Stage III adjudication which provided enough information to be adjudicated. While this sample size represents roughly 15% of the total number of applications currently undergoing Stage III adjudication, there are an additional 1,095 applications that have been received to date which are pending additional information from the provider and/or have yet to be processed which will increase the total number of Stage III applications. Based on the data received/processed to date, the following analysis assumes:

1. The initial sample size of 149 is representative of the overall number of applications that will eventually be placed in Stage III adjudication; and
2. The 1,095 pending/unprocessed applications will follow the same distribution as 2,798 applications processed to date.

Based on these assumptions, out of the initial sample of 149 Stage III applications which have been adjudicated:

- 45% (67 facilities) can be approved under the current policy;
- Additional 28% (42 facilities) could be approved under the revised policy; and
- 27% (40 facilities) cannot be approved under the current or revised policy.

Based on the number of applications approved and the number of applications that would be denied under the current and proposed policy, rough estimates of the overall impact on CCFRI participation rates for 2019/20 are as follows:

- Current policy would result in approximately 3,100 facilities approved, and 650 facilities not approved
- Revised policy would result in approximately 3,500 facilities approved, and 320 facilities not approved.

Based on the adjudication process so far, upon receiving requests from staff that their requested fee increase required additional information, some providers lowered their fees. Assuming that this trend continues, the total number of facilities that will be ultimately not approved may be lower than the estimate above.

1. DISCRETION ABOVE NOMINAL AMOUNTS

The CCFRI Funding Guidelines states that nominal parent fee increases may be approved at the Ministry's sole discretion. Internally, the Ministry initially defined a nominal fee increase as:

- A fee increase (or set of increases) that over the course of a single fiscal year is equal to or less than \$15; or
- A fee increase implemented by a provider that has not increased their fees over the previous three years and is equal to or less than 3% of their current parent fee.

If a provider has requested fee increase above what is considered “nominal”, the adjudicator connects with the provider to request more information to justify the request. At this point, some providers decide to lower their requested fee increase. Ministry staff may exercise limited discretion to approve fee increases above what is defined as nominal for facilities implementing a nominal fee increase in all care types but one (e.g. fee increases are \$15 in almost all care types except for one \$20 increase in the Under 36 Months category).

Proposed Update to Definition of Nominal Increase:

To further streamline adjudication, the Ministry is considering amending the internal definition of nominal, to allow for increases of up to \$25 over the course of a single fiscal year, regardless of whether the fee increase applies to more than one care type. Increases of up to \$25/month would result the CCFRI benefit for 3 years to Kindergarten care being diluted by 42% for Family facilities, and 25% for Group facilities (see Table 1).

Data analysis

Table 1. CCFRI Benefit Dilution Rates due to Nominal Fee Increases (Current vs. Proposed)

Policy	Definition of Nominal Increases	Provider Type	Proportion of CCFRI Benefit Diluted by Maximum Nominal Increase	
			Infant/Toddler Care	3 years to School-age
Current	Increase is <\$15 annually	Group	4%	15%
		Family	8%	25%
Proposed	Increase is <\$25 annually	Group	7%	25%
		Family	13%	42%

Under the revised nominal policy, an additional 23% of Stage III applications could be approved, without further information from the provider, based on the sample (34 facilities out of 149 Stage III applications).

2. REVISED DIRECT CARE STAFF WAGES INTERNAL POLICY

In the event a facility establishes the business case to increase fees to support a wage increase for direct care staff, Ministry staff assess the amount of the proposed wage-related fee increase and, in some circumstances, the amount of the associated wage increase. This assessment ensures that facilities do not excessively increase staff wages at the expense of fee reduction funding intended to benefit parents. During this stage of analysis, the Ministry first considers the amount that the proposed fee increase dilutes the parent fee reduction benefit.

Current Internal Direct Care Staff Wages Policy:

- Once the provider has established the business case for increasing wages, the Ministry will approve fee increases that dilute 15% or less of the CCFRI monthly benefit.

- For fee increase proposals diluting greater than 15% but less than 50% of the benefit, the Ministry will consider whether the fee increase is reasonable, relative to the other wages charged in the facility's Service Delivery Area (SDA), as follows:
 - Facilities paying at or below the median ECE wage in the facility's SDA will be approved to increase wages by up to a maximum increase of 7%; and
 - Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by up to a maximum increase of 4%.
- In all other cases, the Ministry will only approve those portions of a proposed fee increase required to increase wages to the June 2019 minimum wage of \$13.85/hr. As with all fee increases approved under the Fee Increase Exceptions Policy, wage-related fee increases must be proportional to the relevant expense and must be amortized for at least one year (12 months).

While this approach allows for a higher percentage increase for increases to staff wages below the regional median, it does not fully account for the variation in wages below the median.

Proposed Internal Direct Care Staff Wages Policy:

- Once the provider has established the business case for increasing wages, the Ministry will approve all fee increases that dilute 15% or less of the CCFRI monthly benefit, without requiring additional information from the provider.
- For fee increase proposals diluting greater than 15% but less than 50% of the benefit (or less than \$50/month for Family 3 Years to Kindergarten care¹), the following will apply:
 - Facilities paying at or below the median ECE wage in the facility's SDA will be approved;
 - Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by up to a maximum increase of \$1/hour;²
 - Facilities paying higher than the median ECE wages in the facility's SDA will be approved to increase wages by higher than \$1/hour only if the facility is under immediate (generally, within 6 months) threat of closure. In these cases, the fee increase may dilute up to 75% (or \$50/month for Family 3 Years to Kindergarten care).
- In all other cases, the Ministry will only approve those portions of a proposed fee increase required to increase wages to the June 2019 minimum wage of \$13.85/hr. As with all fee increases approved under the Fee Increase Exceptions Policy, wage-related

¹ A separate maximum amount is used for 3 Years to Kindergarten care, in recognition of the relatively low CCFRI fee reduction amount for this care type and that Family providers tend to increase fees in all care types equally. \$50 represents an 83% dilution of this fee reduction amount.

² A \$1 maximum fee increase, as opposed to a percentage maximum increase, better ensures that providers are not advantaged by paying a current wage well above the regional median. This amount is consistent with the increase to median hourly wages for ECEs between 2017/18 to 2018/19 (an \$0.81/hour increase). It is also consistent with a 4% increase to an hourly wage of \$27 (\$1.08 increase), which represents the higher end of the range of most (91%) of Group ECE wages.

fee increases must be proportional to the relevant expense and must be amortized for at least one year (12 months).

Data analysis

Under the revised policy, an additional 1% of Stage III applications could be approved based on the sample (1 facility out of 149 Stage III applications).

3. HOLISTIC APPROACH

Currently, the CCFRI Funding Guidelines are silent on whether the Ministry will accept applications meeting multiple adjudication criteria or scenarios. For example, a provider may propose a fee increase that is partially in line with the facility's historical pattern, partially due to an exceptional circumstance, and partially due to a wage increase.

The Ministry is considering the adoption of an internal policy that clarifies that adjudication can reflect a holistic approach that accounts for multiple reasons for a fee increase. In all cases, the portion of the fee increase covered under the Fee Increase Exceptions Policy must be proportional to any associated expenses and must be amortized over at least 12 months.

Data analysis

Under the revised policy, an additional 5% of Stage III applications could be approved based on the sample (7 facilities out of 149 Stage III applications).

OPTIONS:

s.13

s.13

RECOMMENDATION:

s.13

DECISION and SIGNATURE
Honourable Katrine Conroy

DATE SIGNED

DECISION and SIGNATURE

Honourable Katrina Chen
Minister of State for Child Care

DATE SIGNED

Attachments:

A. N/A

Contact

Assistant Deputy Minister:

Christine Massey
Early Years and Inclusion
s.17

Alternate Contact

for content:

Aleksandra Stevanovic
Child Care Policy
s.17

Prepared by:

Teresa Butler
Child Care Policy
s.17

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 24, 2019 3:48 PM
To: Bond, Allison MCF:EX
Cc: Twyford, Philip MCF:EX; Butler, Teresa MCF:EX
Subject: ECE wages and CCFRI

Follow Up Flag: Follow up
Flag Status: Flagged

Allison – Philip and I spoke with Chris Rathbone at PSEC and they are fine with our approach to wage and CCFRI. You will see a DBN for the ministers shortly.

cm

Stojkovic, Josipa MCF:EX

From: Cain, Krista A MCF:EX
Sent: April 25, 2019 11:47 AM
To: Massey, Christine MCF:EX
Cc: Tran, Kim C (Victoria) MCF:EX; Butler, Teresa MCF:EX
Subject: RE: DBN on CCFRI adjudication

Follow Up Flag: Follow up
Flag Status: Flagged

Yes, will send it over now. Allison hasn't yet reviewed but will flag that it's been sent.
Thx

From: Massey, Christine MCF:EX
Sent: Thursday, April 25, 2019 11:17 AM
To: Cain, Krista A MCF:EX
Cc: Tran, Kim C (Victoria) MCF:EX; Butler, Teresa MCF:EX
Subject: DBN on CCFRI adjudication

Krista – the MO is looking for a DBN I sent up yesterday on the above topic. If Allison hasn't had time to review, is it possible to forward without DM approval? Thanks.

cm

Stojkovic, Josipa MCF:EX

From: Tran, Kim C (Victoria) MCF:EX
Sent: April 26, 2019 11:15 AM
To: Butler, Teresa MCF:EX
Subject: RE: CCFRI
Attachments: FW: Letter to Honour K Chen - April 15, 2019

Follow Up Flag: Follow up
Flag Status: Flagged

Teresa, please see attached...

KCTran

From: Butler, Teresa MCF:EX
Sent: Friday, April 26, 2019 7:48 AM
To: Brown, Jasmin MCF:EX; Tran, Kim C (Victoria) MCF:EX; Karim, Susan MCF:EX; Cotie, Kate L MCF:EX; Bonsdorf, Tanisha MCF:EX
Subject: Fwd: CCFRI

Hi - just checking if any of you recall this letter from the critic coming in? Kim/Tanisha - could one of you check Cliff?

Sent from my iPhone

Begin forwarded message:

From: "Butler, Teresa MCF:EX" <Teresa.Butler@gov.bc.ca>
Date: April 26, 2019 at 7:45:23 AM PDT
To: "Massey, Christine MCF:EX" <Christine.Massey@gov.bc.ca>
Cc: "Wetherill, Anne MCF:EX" <Anne.Wetherill@gov.bc.ca>, "Nelson, Tiffany MCF:EX" <Tiffany.Nelson@gov.bc.ca>
Subject: Re: CCFRI

Perhaps it came in while I was s.22 I don't recall seeing it and it's not with me in eApprovals. I'll check with Tanisha and Kim as well.

Sent from my iPhone

On Apr 26, 2019, at 7:40 AM, Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca> wrote:

I remembered that the letter from the critic was from a couple of weeks ago. It was about our CCFRI policy for new child care providers being unfair to existing providers. Our response will be used by GCPE for public messaging. Hope that helps.

cm

From: Butler, Teresa MCF:EX
Sent: April 25, 2019 7:44 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>; Nelson, Tiffany MCF:EX

[<Tiffany.Nelson@gov.bc.ca>](mailto:Tiffany.Nelson@gov.bc.ca)

Subject: Re: CCFRI

s.13

Sent from my iPhone

On Apr 25, 2019, at 6:39 PM, Massey, Christine MCF:EX [<Christine.Massey@gov.bc.ca>](mailto:Christine.Massey@gov.bc.ca) wrote:

Hi folks – can I please have the following by end of day Friday? This is to be ready for the leg resuming next week. Thanks.

s.13

Anne – for timelines, is it possible to complete the following phrases for public messaging:

s.13

Page 126 of 141 to/à Page 127 of 141

Withheld pursuant to/removed as

s.22

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 26, 2019 4:03 PM
To: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX
Subject: FW: DBN re CCFRI Adjudication Policy Update

Follow Up Flag: Follow up
Flag Status: Flagged

Updated adjudication policies approved!

From: Viaud, Chantille MCF:EX
Sent: April 26, 2019 4:02 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Gunn, Paula MCF:EX <Paula.Gunn@gov.bc.ca>; Cain, Krista A MCF:EX <Krista.Cain@gov.bc.ca>
Subject: Re: DBN re CCFRI Adjudication Policy Update

Both ministers approve this.

Sent from my iPhone

On Apr 25, 2019, at 11:49 AM, Cain, Krista A MCF:EX <Krista.Cain@gov.bc.ca> wrote:

Hello

Please see attached DBN prepared for MKC and MSKC re CCFRI Adjudication Policy Update. Please return with Minister decisions/approvals.

Please note: DM has not yet reviewed/approved this note.

Thanks

Krista Cain
Director, Executive Operations | Client Relations
Deputy Minister's Office
Ministry of Children and Family Development
778.698.5089

<242746_DBN_MKC_MSKC_re CCFRI Adjudication Policy Update_April 23cm_tb.docx>

Stojkovic, Josipa MCF:EX

From: Massey, Christine MCF:EX
Sent: April 26, 2019 4:41 PM
To: Nelson, Tiffany MCF:EX
Cc: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX
Subject: RE: For approval: CCFRI web copy

Follow Up Flag: Follow up
Flag Status: Flagged

Looks great. I will forward along with the denial letter.

From: Nelson, Tiffany MCF:EX
Sent: April 26, 2019 4:37 PM
To: Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Cc: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Wetherill, Anne MCF:EX <Anne.Wetherill@gov.bc.ca>
Subject: For approval: CCFRI web copy
Importance: High

Hi Christine – CCFRI web copy attached, intended to provide details to parents whose facility has been denied. GCPE has reviewed. Karen prefers we no longer reference where we are at in assessment.

Monday, we'll send you final Maintenance Fund + CCFRI web edits.

Thanks

From: Wetherill, Anne MCF:EX
Sent: April 26, 2019 3:53 PM
To: Nelson, Tiffany MCF:EX <Tiffany.Nelson@gov.bc.ca>
Cc: Butler, Teresa MCF:EX <Teresa.Butler@gov.bc.ca>; Massey, Christine MCF:EX <Christine.Massey@gov.bc.ca>
Subject: RE: For final review: CCFRI denial letter

Hi Tiffany here is the web copy with comments...

As long as not going up today..then fine enough. We do need to take one more look I think...

From: Nelson, Tiffany MCF:EX
Sent: Friday, April 26, 2019 3:37 PM
To: Massey, Christine MCF:EX
Cc: Butler, Teresa MCF:EX; Wetherill, Anne MCF:EX
Subject: For final review: CCFRI denial letter

Hi Christine – attached is the latest denial letter, re-ordered slightly from the version MO last saw, with final edits reviewed by Teresa, Anne, GCPE, me. There are two outstanding questions for Anne but sending now in the interest of time.

GCPE is nearly through the BCCCOA response and web copy is with Anne for a last look.

Thanks,

Tiffany
250 858-4680

From: [Cain, Krista A MCF:EX](#)
To: [White, Emily MCF:EX](#); [Hold - 190711 - Wilson, Cherie MCF:EX](#)
Subject: FW: IBN 240565 CCFRI Engagement for MKC/MSKC
Date: December 5, 2018 11:43:00 AM
Attachments: 240565_IBN MKC and MSKC_CCFRI Engagement.docx

Hi

This IBN I sent last week is actually for the briefing on Friday, re Year 2 CCFRI policy and engagement.

Krista

From: Cain, Krista A MCF:EX
Sent: Tuesday, November 27, 2018 11:47 AM
To: White, Emily MCF:EX; Wilson, Cherie MCF:EX
Cc: Gunn, Paula MCF:EX; Perry, Alisma, MCF:EX; Morton, Kaitlin MCF:EX; Massey, Christine MCF:EX; Tran, Kim C (Victoria) MCF:EX; Johnston, Karen GCPE:EX; Lauvaas, Kirsten GCPE:EX; Larabee, Shawn G GCPE:EX; Thouli, Sabreena GCPE:EX; Walker, Leah MCF:EX; Arora, Jasleen MCF:EX; Sharma, Niki MCF:EX
Subject: IBN 240565 CCFRI Engagement for MKC/MSKC

Hi,

Please see attached IBN 240565 prepared for MKC and MSKC re CCFRI Engagement as information only.

The IBN was approved by DM Bond.

Thank you,

Krista Cain

Director, Executive Operations | Client Relations
Deputy Minister's Office
Ministry of Children and Family Development
778.698.5089

MINISTRY OF CHILDREN AND FAMILY DEVELOPMENT INFORMATION NOTE

DATE: November 22, 2018
CLIFF#: 240565

RELEVANT CORRESPONDENCE: 239856, 240121

PREPARED FOR: Honourable Katrine Conroy, Minister of Children and Family Development and Honourable Katrina Chen, Minister of State for Child Care

ISSUE: Child Care Fee Reduction Initiative Proposed Year 2 Policy Changes & Stakeholder Engagement

BACKGROUND:

In April 2018, the Ministry launched the Child Care Fee Reduction Initiative (CCFRI) in order to enhance the affordability of child care by reducing parent fees. Under the CCFRI, eligible providers receive payments in addition to their base Child Care Operating Funding (CCOF), which they are contractually required to pass along to parents in the form of reduced parent fees of up to \$350/month (for group infant/toddler care).

In order to receive the fee reduction funding, providers must be approved to opt-in to the initiative. Applicants are eligible to opt-in if:

- Any fee increases the facility has implemented in the last seven months or plans to implement over the CCOF Funding Agreement term are in line with that facility's historical increases;
- Any past or proposed fee increase are within the regional median range¹; and/or,
- Any past or proposed fee increase is due to a genuine exceptional circumstance that is proportional to the exceptional expense and amortized over a reasonable period of time.

Once providers are approved to participate in the CCFRI, they may request approval from the Ministry to raise their fees beyond what was initially approved during original adjudication, provided the increase is due to a genuine exceptional expense, proportional to that expense, and amortized over a reasonable period of time.

DISCUSSION:

Based on feedback from providers and stakeholders, the Ministry has identified three potential areas that would benefit from further refinement and plans to conduct a focused engagement with sector stakeholders in order to gain greater clarity on these issues. Findings from this engagement will then be used to inform any changes to CCFRI policy and operations prior to April 2019. The Ministry's engagement plan is outlined in Appendix I.

¹ The regional median range of fees is collected in the Annual Provider Profile Survey and calculated by adding the median provider fee in a Service Delivery Area (SDA) to the provincial standard fee increase (for their applicable care type), which is defined as \$50 for Group Child Care, or \$35 for Family Child Care.

1. *Exceptional Circumstances Policy*

The exceptional circumstances policy is used both to adjudicate some providers' eligibility for the CCFRI upon application and/or to adjudicate any fee increases approved providers request mid-contract. This policy allows providers to implement non-standard fee increases if they encounter an unplanned expense, such as a sudden and unexpected increases to rent or operating expenses. In 2018/19, 928 facilities, representing approximately 28% of CCFRI facilities, were approved to the CCFRI under this policy, with fee increases ranging from \$3 up to \$500 per month.

Currently, the exceptional circumstances policy is broad, and allows for providers to be approved for non-standard fee increases under a variety of circumstances. Increasing the precision of the exceptional circumstances policy may better ensure that providers approved to participate in the CCFRI are implementing significant fee increases only where necessary for the ongoing sustainability of their businesses.

2. *Adjudication and Fee Increase Transparency*

In a recent letter to the Honourable Katrina Chen, Minister of State for Child Care, the Coalition of Child Care Advocates of BC (CCCABC) raised concerns regarding significant child care fee increases under the CCFRI and their impacts on families. The CCCABC recommends the Ministry strengthen CCFRI accountability and transparency by:

- a. Publically reporting providers who raise fees due to exceptional circumstances, and
- b. Enhancing communications and reporting mechanisms for families, and requiring providers enrolled in the CCFRI to publically post their fees (see Appendix II).

Additionally, the Ministry has received a number of requests from parents for increased transparency regarding their facility's CCFRI adjudication status and rational for adjudication decisions.

3. *Diversity of Provider Fee Structures*

Under the current structure of the CCFRI, a facility's eligibility for the initiative is adjudicated on the basis of a single fee reported by the facility for each care type. However, the Ministry has learned that some child care providers charge more than one fee per care type, including different rates for children who have been enrolled in the facility longer or for sibling groups. Additionally, extra optional fees are in some cases added on which increases parents overall fees in some cases minimizing the CCFRI amounts. These lower or optional fees are not required to be reported to the Ministry during adjudication, preventing the Ministry from exercising appropriate oversight to ensure these fees are not increased beyond what is approved under CCFRI policy.

Additionally, in a recent letter to the Honourable Katrina Chen, Minister of State for Child Care, First Call BC Child and Youth Advocacy Coalition indicated concerns from parents that some providers are charging higher fees for children with extra support needs (see Appendix III). CCFRI staff have also received concerns regarding additional fees charged for children in the care of the Ministry. Due to the current CCFRI reporting structure, providers may not be reporting these higher fees when they apply for the initiative, preventing the Ministry from understanding the full scope of this issue and monitoring any increases in these fees.

NEXT STEPS:

The Ministry will conduct a targeted sector engagement in November/December 2018 on the above issues in order to gain a better understanding of the scope and impact of these issues. The feedback gathered during this engagement will help inform any appropriate policy and operational changes for the 2019/20 funding term.

The Ministry is also planning an additional, more comprehensive engagement in fiscal 2019/20 that will consider options for fee capping in future years of Childcare BC (e.g. fiscal 2020/21).

Attachments:

Appendix I: Stakeholder Engagement Plan

Appendix II: Letter from the CCCABC - Affordability Excerpts

Appendix III: Letter from First Call BC Child and Youth Advocacy Coalition

Contact**Assistant Deputy Minister:**

Christine Massey

Early Years and Inclusion

s.17

Alternate Contact**for content:**

Teresa Butler, A/ED

Child Care Policy

s.17

Prepared by:

Jasmin Brown, Sr. Policy Analyst

Child Care Policy

s.17

Appendix I: Stakeholder Engagement Approach: Child Care Fee Reduction Initiative (Year Two)

Objective: Seek input from child care providers on policy considerations relating to year two implementation of the Child Care Fee Reduction Initiative (CCFRI); specifically:

- -increased fee transparency
- -clarification/ expansion of exceptional circumstances policy
- -diversity of provider fee structures, and
- -areas of concern with the administration of the CCFRI

Stakeholder opportunity: As we approach the end of the first year of implementation of the CCFRI, policy work is being undertaken to assess opportunities to revise and/ or add to the current policy framework. When this initiative was implemented in April 2018, it generated some anxiety within the child care provider community, particularly amongst private providers (i.e. sole proprietor & limited partnership) regarding the viability of their business models as a result of restricted discretion around fee structures. The speed with which the CCFRI was introduced also limited the ability to engage stakeholders in meaningful consultation.

An IPSOS survey was distributed in April 2018 to child care providers who had not opted-in to the CCFRI. Survey feedback confirmed that providers found program information confusing, timelines unrealistic and administrative requirements burdensome.

The proposed engagement will enable the Ministry to demonstrate a commitment to continuous improvement of the CCFRI policy and program delivery, through seeking ideas and recommendations from those who are most directly and significantly impacted. It will also provide an opportunity to foreshadow a more comprehensive engagement in fiscal 2019/ 2020 focused on the contentious issue of fee structures/ fee increases. This timeline will demonstrate government's responsiveness to concerns about stakeholder burn-out during a period of rapid change within the child care sector, as well as feedback about the importance of adequate notice and reasonable response windows to government policy changes.

Of note, the proposed focus on increased fee transparency is consistent with user testing confirming that parents support increased transparency and accountability for child care providers.

Public/media announcement planned: Any changes resulting from this engagement can be included as part of communications to the sector in early 2019 highlighting the Ministry efforts to address the administrative concerns articulated by providers.

Key risks: Notwithstanding the high opt-in rate to the CCFRI (approximately 90%), there is lingering resentment amongst some child care providers that they had "no choice." This

engagement could be leveraged by some providers as a platform to advocate for whole-scale replacement of the initiative.

Target audience(s):

1. Stratified sample of providers representing different operating models, different care types and different regions of the province (**survey**)

2. Associations/ Advocacy Groups representing each type of operating model and care type (**one focus group per organization**); E.g.:

- Family – I/ T; 3-5; school-age/ Out of School Care
- In Home Multi Age
- Group – I/ T; 3-5; school-age/ Out of School Care
- Group Multi Age
- Preschool
- Non-profit
- For-profit
- Indigenous Care Providers

Timing considerations: Any consultation and resulting policy/ contract changes will need to be finalized by early January 2019 to ensure there is sufficient time to implement required IM/ IT changes, in advance of the issuance of new COOF contracts in April 2019.

Timeline and Communications tactics:

Tactic	Distribution	Deadline
Finalize engagement plan with GDX and IPSOS, including invite lists for focus groups and survey	N/A	Nov. 26
Draft survey	N/A	Nov. 28
Draft email alert to survey invitees	Sample of providers	Nov. 28
Develop questions for focus groups	N/A	Nov. 30
Approve questions for focus groups	N/A	Nov. 30
Email alert sent to survey and focus group invitees	via GDX engagement mailbox	Dec. 3
Survey active	N/A	Dec. 3-14
Focus groups conducted with GDX facilitator	N/A	Dec. 3-14
Survey results assessed and internal report produced	N/A	Dec. 17-20
Review of report	N/A	Dec. 20-23
Policy finalized		Jan. 2
Update of communications including website, policy and funding agreements		Jan. 6
Communication to providers prior to start of contract renewals to report out on what was heard		
Develop and finalize engagement plan for phase two		March

Tactic	Distribution	Deadline
engagement re: fee increases/caps		
Communication to providers after contracts signed to invite to next phase of engagement re: fee increases/caps, with a year's notice		April-May
Launch of more robust engagement on fee caps with communication tools to explain considerations		

Social media/online strategy: Not recommended

Appendix II: Letter from the Coalition of Child Care Advocates of BC - Affordability Excerpts

CLIFF #: 239856

September 21, 2018

Honourable Katrina Chen
Minister of State for Child Care
PO Box 9057 STN PROV GOVT
Victoria, BC V8V 9E2

Dear Minister of State Chen:

Recently we have been contacted by parents and child care providers expressing concern about:

1. Child care fees that, from their perspective, are increasing substantially – despite their program's participation in the Child Care Fee Reduction Initiative (FRI)
2. Licensed programs that may be closing, for various publicly-stated reasons.

In the past, we alerted you to individual cases of unusual fee increases in Nanaimo that came to our attention. We are now hearing of large fee increases in other communities, typically in for-profit operations, which have resulted in no, or minimal, fee reductions for families.

Ministry staff have advised they are monitoring the situation closely, and find these are isolated situations. We hope that remains true for both unusual fee increases and program closures.

Certainly, we've been hearing lots of concerns about fee increases and program closures for many years.

However, unlike the previous government, your government is making significant investments in lowering parent fees and increasing licensed spaces, so it's essential to ensure that your child care priorities are not undermined. In addition to the policies and accountability mechanisms already in place, we recommend that government take proactive steps to reduce the possibility of these situations arising, follow-up on individual concerns, and take action where appropriate and necessary.

Parent Fee Increases

As previously discussed, we believe that proactive monitoring of parent fee increases is particularly important now that the Affordable Child Care Benefit (ACCB) has been introduced, due to the potential upward pressure the ACCB will place on parent fees. We have specific recommendations for strengthening public accountability and transparency of government, and of child care providers who receive public funding through the Child Care Fee Reduction Initiative and/or the Affordable Child Care Benefit.

Government should:

1. Publicly report on the fee increase guidelines that providers are required to adhere to in order to maintain their participation in the FRI
2. Publicly report on the facilities granted exemption from the above guidelines
3. Provide a mechanism for parents to share any concerns, ensuring anonymity (to reduce concerns about retribution for their families).

Providers should be required to:

1. Publicly share their fee schedules for the last 12 months, at a minimum. This information should be posted on their web sites and displayed prominently in their physical facilities.
2. Provide a full written explanation to families for any increases in excess of the FRI guidelines.

...

We look forward to your prompt consideration of these concerns and recommendations, and would be pleased to discuss them in more detail.

Yours truly,

Sharon Gregson and Lynell Anderson CPA, CGA
Coalition of Child Care Advocates of BC

Appendix III: Letter from First Call BC Child and Youth Advocacy Coalition

CLIFF #: 240121

October 16, 2018

Honourable Katrina Chen
Minister of State for Child Care
PO Box 9057, Stn Prov Govt
Victoria, BC V8W 9E2

Dear Minister Chen,

First Call's Early Childhood Development Roundtable has been discussing concerns arising from the experiences of families who have children with special needs about the fees they are being charged by some child care providers.

As a new publicly-funded child care system is being developed in BC, we are writing to let you know the type of concerns we have been hearing about prior to the announcement of the Fee Reduction Initiative and the Affordable Child Care Benefit, and to ask for some clarity on government policy going forward.

Anecdotally, families have reported that:

- Providers have charged higher fees for their child with extra support needs, than the fees charged for other children.
- Families are charged for the full-time space, but their children with special needs are provided shorter hours of service.
- Parents are paying for additional employee hours that SCDP is not able to cover with funding.
- Parents are paying infant/toddler space fees for their child to attend a 3-5 year old space.

Obviously these experiences raise serious concerns about the rights of children with special needs and accountability from providers when they are receiving public funds.

We recognize that many years of underfunding of child care generally, and the supported child development program (SCDP) and Aboriginal supported child development program (ASCDP), have led to the struggles families are experiencing and challenges for child care providers in meeting the care needs of children with special needs. We write to alert you to these inequities and discriminatory practices and to seek assurance that they will not be supported by public funding in the new child care system.

Can you provide us with more information about how funding for special needs children is being integrated into the new child care system? Does government allow child care providers receiving public funding to charge differential fees for children with special needs?

As a signatory to the UN Convention on the Rights of Persons with Disabilities and the UN Convention on the Rights of the Child, Canada has committed to ensure non-discrimination for children with disabilities, including in education and access to services, as well as to special care. We trust BC's new child care program will embed respect for these rights in policy and practice in order to be truly inclusive of all children.

Thank you for considering these concerns and we look forward to your response to our questions.

Sincerely,

Adrienne Montani
Provincial Coordinator