



**NORTHERN ONTARIO
SERVICE DELIVERERS ASSOCIATION**
c/o Henry Wall
211 Princess Street, Suite 1
Dryden ON P8N 3L5

June 19, 2017

Indira Naidoo-Harris, Minister of the Status of Women and
Minister Responsible for Early Years and Child Care
Ferguson Block 12th Floor,
77 Wellesley St W,
Toronto, ON
M7A 1N3

SENT BY EMAIL: indira.naidoo-harris@ontario.ca

Dear Minister:

RE: Regulations under the Child Care and Early Years Act that affect Home Child Care Agencies and Home Child Care Providers

We greatly appreciated your attendance at our Annual General Meeting in North Bay on Thursday, June 8 and were pleased with the direction your Ministry is taking with regard to Ontario's network of Early Years Child and Family Centres. However, concerns have been expressed concerning the Provincial Child Care and Early Years Act, O. regulation 137/15. At our Annual General Meeting, the following Resolution was passed:

WHEREAS the Provincial Child Care and Early Years Act, O. regulation 137/15 includes requirements for Home Child Care Agencies and Home Child Care Providers effective September 1, 2017; and

WHEREAS the new requirements to privately place children may have the unforeseen impact of affecting the contractual relationship of independent contractors of Home Child Care Providers as well as increasing the liability of Home Child Care Agencies; and

WHEREAS such an impact may place the ongoing viability of licensed Home Child Care Agencies and Home Child Care Providers at risk.

THEREFORE BE IT RESOLVED THAT we urge the Minister to review the current regulations so that the integrity of the Home Child Care Program as independent contractors is maintained and the liability exposure of the Home Child Care Program is not adversely affected; and

FURTHER BE IT RESOLVED THAT the Ministry provide CMSMs/DSSABs with a guarantee that the regulations will not adversely affect the independent contractor status and that any additional costs from increased liability or from a loss of independent contractor status will be borne by the Ministry of Education.

We welcome the opportunity of working with you and your staff to ensure that this Regulation be modified to mitigate the potential for unintended consequences as may be implied by its current wording.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Iain Angus', is positioned above the printed name.

Iain Angus, Chair