

# Quality Early Learning Network

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## Member Agencies

September 24, 2012

Canadian Mothercraft Society

Honourable Laurel Broten

Minister of Education

Child Development Institute

Mowat Block

22nd Floor - 900 Bay Street

Community of Maple Child Care Services

Toronto, Ontario M7A1L2

Denison Child Care

Dear Minister Broten:

Family Day Care Services

The Quality Early Learning Network is pleased to provide this response to ***Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together***, released by your Ministry in June 2012.

London Children's Connection

The Quality Early Learning Network appreciates the commitment to addressing the challenges facing the sector that your government is demonstrating through the release of the discussion paper.

Macaulay Child Development Centre

The Quality Early Learning Network is an association of 18 multi-site, not-for-profit organizations delivering licensed child care and other programs and services for children and parents in southern Ontario. We are pleased that the responsibility for child care now rests with your Ministry. This provides a real opportunity to build a seamless system of early learning and care that will support children and families and strengthen communities.

Milton Community Resource Centre

The Quality Early Learning Network is looking forward to working in partnership with the Ministry to ensure the successful modernization of child care in Ontario.

Network Child Care Services

PLASP Child Care Services

Schoolhouse Playcare Centres of Durham

The Learning Enrichment Foundation

The Quality Early Learning Network shares the government's belief that access to high quality, licensed child care is "crucial to Ontario's success."<sup>1</sup> Not only is it critical to the well being of children and their families, it is an essential component of a thriving Ontario. The importance of access to high quality child care is now broadly understood. **Ontario's Youth Action Plan 2012** states "The research is clear: investing early helps prepare our children for success in school and in life... We know that when disadvantaged children are provided with supports early, there is greater opportunity for them to thrive."<sup>2</sup>

Today's Family Early Learning and Child Care

Upper Canada Child Care Centres

WoodGreen Community Services

YMCA of Greater Toronto

York Child Development & Family Services Inc.

York Professional Care & Education

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<sup>1</sup> *Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together*. Page 2

<sup>2</sup> Hoskins, Eric and Madeleine Meilleur. (2012) *Ontario's Youth Action Plan*. Government of Ontario. Page 4

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The licensed child care sector is facing serious challenges. The government's recent commitment to stabilization funding for the sector was an appreciated and significant first step towards strengthening the sector.

The Quality Early Learning Network agrees with you that the first and most immediate priority is to stabilize the existing child care system. Preserving system capacity is critical to the long term viability of the sector. It is much more costly to rebuild than it is to maintain.

The consultation currently underway on ***Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together*** is an important second step towards addressing the challenges faced by young children and families in Ontario and the child care sector that seeks to meet their needs. It is an ambitious document that raises important issues, all of which require a thoughtful response.

In addition to our more detailed response (attached) to the questions raised in the ***Modernizing Child Care*** document, the Quality Early Learning Network wishes to highlight two specific solutions.

Minister Broten, we are requesting that you:

**1) Establish a Minister's Child Care Advisory Table to provide expert advice on the more complex modernization questions to be addressed in both the short and the long term.**

- a. To be composed of a small group of recognized experts, including experienced service providers, consumers and academics selected by you as Minister of Education.
- b. An advisory group to discuss issues, identify possible solutions and redefine relationships.
- c. While the Minister's Child Care Advisory Table would inevitably discuss how to effectively fund the sector, the Quality Early Learning Network envisions a forum that is much broader in scope; a place where experts gather to review relevant research, provide advice on resolving issues and not just to ask for more money.
- d. A Minister's Child Care Advisory Table would provide a public forum for your government to demonstrate its continuing commitment to child care and would be construed positively by the broad child care community.
- e. Consider the Minister's Special Needs Advisory Table as a model for this forum.

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- 2) Give priority to modernizing the existing funding model and introducing a new base funding mechanism to stabilize the existing system and to build a solid foundation for future growth.

In 2012, the Quality Early Learning Network released a paper entitled **Solutions – How the Ontario government can rescue and ensure the viability and quality of the province’s child care system**. The paper sets out a detailed immediate, short, medium and long-term plan with respect to stabilizing, strengthening and growing the child care sector in Ontario. The paper contends that for the child care sector to survive and flourish, four things are required:

- Immediate, emergency financial assistance (Your government has already provided funding for this purpose)
- long-term policy framework,
- increased stable public funding, and
- a modernized funding model

The **Solutions** paper outlines a funding model that would serve as the foundation of a comprehensive child care system able to meet the needs not only of families but of the broader society as well. We have attached a copy of the **Solutions** paper to this letter for your information and would be delighted to talk with you and your senior staff about the recommendations found in the document.

The members of the Quality Early Learning Network have a wealth of experience working in the not-for-profit sector, the licensed child care system and with a broad range of programs and services for families. The Quality Early Learning Network believes that our expertise together with our whole hearted support of the principles outlined in the **Modernization** paper provides a perspective that is of value to you and your government as you move forward with restructuring the child care system. We look forward to meeting with you to discuss our attached response in greater detail. Thank you for the opportunity to participate in the modernization process.

Sincerely,



Joan Arruda  
Co-Chair, QELN



Linda Cottes  
Co-Chair, QELN

c.c. Jim Grieve - Assistant Deputy Minister, Ministry of Education

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## MODERNIZING CHILD CARE IN ONTARIO: SHARING CONVERSATIONS, STRENGTHENING PARTNERSHIPS, WORKING TOGETHER

### QELN RESPONSE

#### Introduction

The Quality Early Learning Network shares the government's belief that access to high quality early learning and care opportunities is "crucial to Ontario's success."<sup>1</sup> Not only is it critical to the well being of children and their families, it is an essential component of a thriving Ontario.

The release of *Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together* is an important second step towards addressing the challenges faced by young children and families in Ontario and the early learning and care sector seeking to meet their needs.

Modernizing the sector is a complex undertaking that involves addressing a number of complicated issues:

- Funding mechanisms
- Harmonizing the *Day Nurseries Act* and the *Education Act* where applicable
- Day Nurseries Act amendments and updates

It is important to note that the most important component of modernizing the early learning and care sector is to completely revamp the funding mechanisms.<sup>2</sup>

The Quality Early Learning Network is pleased to have this opportunity to respond to a number of the questions raised in the discussion paper.

#### Context – A Changing Early Learning and Care Environment

As noted by renowned experts in the field, Margaret McCain and Dr. Fraser Mustard, "Quality is the key word. The benefits from high-quality early education and care have been firmly established, but poor – quality programs can be worse than nothing, retarding children's development, wasting taxpayers' money and inflicting long-term harm on efforts to expand preschool when they fail to deliver promised results." (Early Years Study 3)

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<sup>1</sup> *Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together*, page 2

<sup>2</sup> *Solutions – How the Ontario government can rescue and ensure the viability and quality of the province's child care system*, Quality Early Learning Network, 2012

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Modernizing the *Day Nurseries Act* must support high-quality child care for children. The financial pressures faced by all orders of government will inform the process but must not become the sole impetus for change.

It is important to build upon existing successes and recognize that *modernization* is really about *transformation*. Given that the government acknowledges in the paper that “over the next three years, the process of modernization will not be about expanding the current system”<sup>3</sup>, it is important to view each step taken as part of the implementation of a longer term vision that acknowledges the importance of equitable access to high quality child care opportunities for all who need and want them.

Recognizing that there are literally thousands of children and families who are waiting to access child care today, it is important to realize that these first steps will do little for these families. However, if, through a process of active collaboration and partnership, the government moves forward in a way that increases the capacity of the system to grow in a planned, rational manner that recognizes the diversity of needs across the province, this initial modernization process will throw open the doors to what could and should become a truly comprehensive system of early learning and care that is second to none.

## Guiding Principles

The document *Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together* identifies five major guiding principles:

- 1) **Support and choice for children and families.**
- 2) **Commitment to quality programs for all children.**
- 3) **Efficient funding formula.**
- 4) **Supportive legislation and regulations.**
- 5) **Evidence-based decision making and reporting.**

The Quality Early Learning Network strongly supports these guiding principles and urges the addition of two additional guiding principles:

- 6) **Partnership and Integration.**
  - a. A commitment to ensuring that all stakeholders are at the table.
  - b. Strategies that promote dialogue and build a working partnership between child care and schools, between CMSMs and school boards with the goal of creating a new shared culture committed to quality and seamless experiences for children.
  - c. A commitment to municipally led locally based planning and development

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<sup>3</sup> *Modernizing Child Care in Ontario: Sharing Conversations. Strengthening Partnerships, Working Together*, page 2

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- d. Recognition in both regulation and funding mechanisms that what works in some communities/areas will not work in others. (rural, suburban, urban, demographics, poverty levels, access to trained staff etc).

**7) Well trained, equitably compensated, responsive professional staff are the linchpin of a high quality early learning and care sector.**

## 1. OPERATING FUNDING

The Quality Early Learning Network believes that the first and perhaps most critical step towards modernizing the child care sector is to amend complicated existing funding mechanisms. To this end, the QELN published a paper in February 2012 entitled ***Solutions: How the Ontario government can rescue and ensure the viability and quality of the province's child care system.*** For complete details about how the funding system could be revamped and modernized, please refer to this document.

- **How can the approach to child care funding be revised to enable more transparent and efficient allocations to municipal service system managers and First Nations?**
  - 1) Funding to municipal service system managers and First Nations must be more flexible to permit service system managers to respond more effectively to the needs of the licensed child care sector.
  - 2) Funding allocations must be multi-year to enable thoughtful collaborative planning.
  - 3) Index the funding to reflect ongoing increases in the cost of living.
  - 4) Enable service system managers to base/core fund early learning and care programs.
- **What elements should be considered when developing a new funding formula (e.g., demographics, demand, costs)?**
  - 1) Funding decisions should be made in the context of a collaborative community based planning process that engages all stakeholders in a meaningful way.
  - 2) Move towards “supply-side” funding and away from “demand-side” funding<sup>4</sup>. Move toward base funding early learning and care programs directly rather than directly funding parents through a fee subsidy program.
  - 3) Base fund using the operating capacity of the child care program.
    - a. An Ontario – wide formula should be designed that accounts for the types of service being provided, the age groups for which service is being provided, the licensed capacity and the operating capacity.

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<sup>4</sup> Quality Early Learning Network (2012) *Solutions – How the Ontario government can rescue and ensure the viability and quality of the province's child care system.* page 9

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- b. Recognize the additional costs of providing infant programs, for example the need to be at 100% ratio at all times of the day, and incorporate this into the base funding model.
  - c. Base funding must recognize the actual costs of providing care and must incorporate items such as rent which may vary depending upon the location of the program. (See below for more information about potential locations and planning for capital expenditures.)
- 4) End government funding to for-profit programs.
- **How can current funding be streamlined or consolidated to improve flexibility and efficiency?**

Within the context of the existing funding levels the following strategies would improve flexibility and efficiency:

- 1) In the short term, reduce the number of funding pots and funding streams so that service system managers have more flexibility.
- 2) Move towards a “supply side” funding model (wherein public funding goes directly to partially or totally fund early learning and care centres) and away from “demand-side” funding where funding is attached to the family.<sup>5</sup>
- 3) Recognize that the not for profit sector is dependent upon existing wage enhancement funding streams to meet salary and benefit commitments and that a precipitous removal of this funding will further jeopardize the fragile early learning and care system in the short term.
- 4) Cease funding for-profit, commercial operations.

## 2. CAPITAL FUNDING PRIORITIES

- **How can the Ministry of Education facilitate collaboration and joint planning among school boards, service system managers and child care operators so they can plan and manage this approach?**

Empower CMSMS to lead a community-based planning process; Ensure that this process engages all stakeholders.

Embed planning for capital funding into a process with a broader mandate that at minimum includes all childcare and education and ideally encompasses children’s services as a whole.

Recognize that childcare is part of a continuum of public services that support children and families and Ontario as whole.

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<sup>5</sup> Please see *Solutions – How the Ontario government can rescue and ensure the viability and quality of the province’s child care system*, Quality Early Learning Network, 2012 for additional details.

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- **What supporting policies are required to ensure the success of a schools-first child care policy (e.g., long-term planning on space for school-based operators, reasonable accommodation costs, facilities, and other shared space issues)?**

It is important to recognize the schools are one component of a comprehensive system of community based resources all of which have a place in the development and delivery of quality child care programs and services. Potential sites include not only schools but recreation centres, community centres, public buildings of all sorts and in some communities might also include places of worship and commercial space. Workplace child care is also the choice of many families especially for younger children.

The Quality Early Learning Network supports the use of schools as the site for child care but recognizes that:

- 1) Schools as public spaces (not unlike hospitals) are a community asset and should be open to all, with sufficient funding to allow access 365 days a year.
- 2) There is not sufficient space in schools to meet the physical plant need of the entire child care sector.
- 3) The decision about where to locate programs and services must be made through a municipally led planning process that includes all stakeholders at the table as equal participants, and not be determined by school boards and the Ministry of Education alone.
- 4) Parental choice must be considered when determining the site of child care programs.

- **Where school-based space does not meet community needs, are there additional capital tools that could support community-based child care operators?**

Planning – capital and otherwise – should happen for community based programs in the same way that it does for those located in school based programs and at the same tables.

## 3. QUALITY PROGRAMS

- **Based on your experience and knowledge of existing research and evidence, how can provincial program guidelines support program quality?**

It is important to recognize that there is a direct connection between quality, stable funding, and qualified trained staff who are well paid with access to comprehensive benefits, and ongoing professional development opportunities. Funding the system adequately is a key component of quality. It is from this perspective that the following suggestions are made:

- 1) Child care programs must demonstrate that they are delivering evidence based curricula based on a widely recognized and accepted framework such as ELECT that is supported by ongoing professional development.



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- a. The curricula must be play based.
  - b. The program must reduce the number of transitions that children experience.
- 2) In the same way that there are expected outcomes for FDK programs so there should be for child care programs. These should be provincial standards.
  - 3) It is important to recognize that our understanding of how children learn and how to best support their learning and healthy development continues to advance. It is important that in the process of modernizing the child care system, we allow for this. Regulations rather than legislation with respect to curricula and program would allow for continuous improvement connected to on-going research.
  - 4) Institute a requirement that service system managers only enter into contractual funding arrangements with those not-for-profit child care programs that deliver quality programs.
- **How can program quality be demonstrated and connected to the licensing process?**

Develop broad indicators that can be used consistently across the province.

    - a. The indicators must reflect a range of acceptable curricula models.
    - b. The indicators should be in the form of a tool that early learning and care programs can use to monitor their own quality levels.
  - **What additional tools or professional development opportunities would be helpful to support ongoing quality improvement?**
    - 1) There must be a requirement that early childhood educators participate in ongoing professional development. Resources should be made available to support professional development.
    - 2) Create a recognized position of pedagogical leadership in a child care centre or early learning environment.
    - 3) Implement recognition of ECE degrees in the modernized standards (a two tier system) to encourage early childhood educators to upgrade their training.
    - 4) Consider the introduction of a peer support system wherein a lead organization /agency would provide administrative and infrastructure support to smaller organizations including the coordination of professional development opportunities.<sup>6</sup>

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<sup>6</sup> Quality Early Learning Network(2011) *Child and Family Centres: Moving Forward* page 3

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- **How can we ensure that program guidelines meet the distinct needs of diverse communities?**
  - 1) Recognize that a systemic approach to diversity and social inclusion is required.
    - a. Use local planning data from CMSMs to ensure that the population of each community has its needs met.
    - b. A simple checklist will not address this challenge.
  - 2) Expect child care programs to use a family centred model of care.
  
- **What components of the special needs resourcing program should be reviewed and streamlined (e.g., eligibility criteria, services provided, qualifications for resource consultants)?**
  - 1) Inclusion is not an option. All programs should be expected to provide support for children with special needs and must receive the assistance that they require to do so.
  - 2) Consider the challenges faced by communities where many families are living in poverty. The children may demonstrate behaviours that are not part of a specific diagnosis but are situational. Notwithstanding the lack of a diagnosis, early learning and care programs may require additional supports to effectively meet the needs of the children and their families:
    - a. An increased need for specialized services such as occupational therapy, speech and language and play therapy without lengthy waiting lists. These are communities where purchasing these services privately is not an option.
    - b. Extend the age of support to include 6 to 12 year olds to provide consistency through school transitions.
    - c. Establish a stronger partnership between schools, child care programs and specialized support systems to provide consistency and support children's continuous development.
    - d. Create resource centres that allow parents to access/borrow materials that will support their children's development including toys, books, and physical equipment.
  - 3) Recognize that adequately meeting the increasing number of children with special needs requires a flexible source of funding that childcare programs can access to support those children who require specialized or one-on-one support.
  - 4) There must be integrated planning to support children from 0 to 12.
  - 5) Criteria for eligibility for additional support should be jointly developed by service system managers and the province with the involvement of childcare programs and specialized services.

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- **What resources about program quality could the government develop to help parents make choices about care?**

While it is important to provide information to parents that will enable them to make informed choices about their child's care, it must be recognized that for many parents, whether or not they have information, the choice of care will be limited by:

- Cost/Fee Level/Access to Subsidy
- Lack of availability
- Location

Addressing these issues is the first and very significant step, to addressing the issue of providing parents with meaningful choice.

## 4. MODERNIZED LEGISLATIVE AND REGULATORY FRAMEWORK

- **How should standards be updated to improve health, safety and overall quality in child care?**

- 1) Changes to the legislative and regulatory framework must be reflective of evidence-based research and best practice. Cost should not be a driving factor in determining standards.
- 2) Identify core standards that must be achieved at all times by all programs.
- 3) Consider taking an outcome based approach to the legislative and regulatory framework that starts from the premise that high quality care that supports healthy development in all domains is the expected outcome and determine the inputs that would support early learning and care programs to reach this outcome.
- 4) While modernizing the *Day Nurseries Act* and the regulatory framework in which child care is delivered is important, resolving the funding crisis and modernizing the funding mechanisms is much more immediate. Stable and viable funding provides a solid foundation for quality.
- 5) Collaborate with CMSMs to standardize expectations across regions with respect to health and safety requirements that fall under the auspice of local health and fire departments.

- **How can the government reduce duplication and overlap in requirements for licensed child care providers?**

Given the amount of duplication and overlap in requirements for licensed early learning and care programs, there is a considerable amount that could be accomplished in this area during the modernization process. The challenge is to simplify the system without diminishing expectations to the degree that quality is jeopardized. The Quality Early

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Learning Network suggests that the roles of the province and municipalities be clarified and separated to reduce duplication. Municipalities would be responsible for:

- Planning and development
- Allocating funding and resources.

The province would be responsible for:

- Licensing
  - Quality Assurance (using a risk management approach)
    - Ministry staff tasked with supporting quality assurance must have training and experience in the sector.
    - The quality assurance function must be adequately resourced.
- 1) Take a risk management approach to licensing. Recognize that multi-site operators have more capacity than stand-alone sites and that there are centralized administrative and program planning structures in place in these organizations.
    - a. Explore the possibility of issuing one license for multi-site agencies rather than on a centre-by-centre basis. (This is not dissimilar to the home child care model of licensing the agency as opposed to individual providers.)
    - b. Hold the agency responsible for ensuring that legislated standards are achieved at each site.
  - 2) Align and harmonize fire, health and zoning requirements.

- **How can the government more effectively harmonize standards across legislation as well as regulatory requirements in child care (e.g., numbers/ages of children in licensed vs. unlicensed home care, clarification of programs that do and do not require licences)?**

It is difficult to justify the differences in expectations between auspice when it comes to programs that are serving exactly the same children. It is possible that the same child attends different programmes at the same location that operate under different standards and regulations. Therefore:

- 1) Standards for school operated before- and after-school programs should be the same as for those run by child care programs.
- 2) All home child care must follow the same standards.

- **As the government looks to deliver on the commitment to provide on-site after-school programs for six-to-12-year-olds, should we consider a new licensing category for older children that builds on the strengths of a recreation program model (e.g., different program requirements for older children, participation in recreation-focused programs)?**

It is important to note that there are significant developmental differences between a 6 year old child and a 12 year old child. It may not be appropriate to consider that the

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requirements would be the same for this entire age spectrum. With this proviso, consider the following:

- 1) Quality is still paramount and service providers must be accountable for providing developmentally appropriate quality programs.
- 2) Given the shortage of RECEs and the interests of older children, look at the qualifications required for working with children 8 to 12. Recreation training is one possible qualification.
- 3) Consider reviewing the “Middle Years Strategy” (City of Toronto) for additional research on developing and implementing programs for older school age children.

- **How could new licensing approaches support home- and centre-based care in smaller, rural and remote communities (e.g., permitting home-based providers to care for more children where there is more than one provider, providing greater flexibility for family or mixed age groupings and space configurations)?**

Within a modernized child care sector, there should be two possible models for the delivery of home child care -- one of which offers a high level of accountability with respect to safety and quality assurance and one, which while providing a lower level of accountability, is stronger than that which is available in our current system. The two models are:

- 1) A single caregiver (independent contractor) providing care in her own home, supported by a licensed home child care agency. (The existing model.)
- 2) Two caregivers (both independent contractors) providing care in a single home, supported by a licensed home child care agency.
  - a. One provider must be a Registered Early Childhood Educator.
  - b. The second provider must be over the age of 18 and have basic first aid training.
  - c. Any two-provider home must be directly affiliated with a licensed home child care agency.
  - d. Agencies will be responsible for demonstrating that all quality indicators can be achieved in the two provider home. (space, safety, quality of program delivery, addressing parent and child needs)

- **How can the government foster quality in informal home-based child care?**

For those providing informal/unlicensed home child care, an immediate regulatory change that limits the number of children to four (4) including the provider’s children under the age of six (6). Add a further requirement that informal providers have the same age grouping restrictions as those in the licensed sector.

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## 5. SUPPORT FOR ACCOUNTABILITY AND CAPACITY BUILDING

- **How can risk assessments help the government use licensing resources more effectively, encourage compliance and reward high-performing child care operators?**

The use of the word reward is inappropriate. Programs should not be rewarded for meeting expectations, this should be a given. On the other hand, there must be consequences for those programs that are not meeting the standards.

- **How can the government encourage quality and licensing compliance (e.g., administrative orders, administrative monetary penalties)?**

The most significant and immediate change would be to ensure that the Day Nurseries Act supports quality and is not just establishing minimum standards that do not approach the requirements of quality care.

- 1) Move away from check list approach to an evidence based comprehensive demonstration of quality delivery and administration.
- 2) Develop guidelines and parameters for CMSMs related to purchase of service agreements and funding allocations. Contracts should be terminated for those programs that are consistently non-compliant.
- 3) Eliminate the expectation that any program that meets the standards will be licensed. Licenses should be managed and issued in conjunction with local planning processes.
- 4) Stop providing government funding to commercial operations.

- **What tools can support program and administrative leadership in child care (e.g., for centre directors and staff, volunteer not-for-profit boards)?**

There is a significant difference between stand-alone centres and multi-site agencies. Multi-site childcare service providers have increased capacity and expertise in house in the areas of administration, governance and program planning and implementation. This should be considered and incorporated into the licensing and quality assurance process.

- **How can the government support the use of evaluative tools in licensed child care, including common registration and screening tools, as well as the Ontario Education Number?**

- 1) Provide funding to support training on the use of tools, implementation of tools and the evaluation of results.
- 2) There is value in defining a common set of questions to be asked across the province to allow for provincial comparisons.
- 3) Make more use of the EDI and create a standard reporting template so that information is easily accessed and comparable.

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- **What information should be collected from operators annually in order to provide a regular cycle of public reporting on the child care system in Ontario (e.g., hours of operators, parent fees, staff compensation)?**
  - 1) Do not duplicate data collection. Work collaboratively with CMSMs to coordinate and share data collection.
  - 2) When collecting information about compensation – which would be useful information to collect – recognize that it is more complex than just determining the hourly rate. Information about benefits and pensions is also important.
  - 3) It would be important, especially during this time of transition to collect information about hours of work and the number of professionals who are working split shifts.
  - 4) Recognize the importance of collecting data related to the provision of licensed home child care as this is a significant component of the licensed early learning and care system.