

October 4, 2021

OACAS response to the proposed statutory and regulatory amendments to the Child, Youth and Family Services Act, 2017 (CYFSA) for improving access to prevention services for First Nations, Inuit and Métis children, young persons, and families.

Proposal number 21-MCCSS010

The Ontario Association of Children's Aid Societies (OACAS) is a provincial membership organization representing 48 of the 51 Children's Aid Societies and Indigenous Child and Family Well-Being Agencies, two of which are pre-mandated Indigenous agencies in Ontario. We support member Societies with having the necessary tools, training, and conditions to fulfill their statutory mandate to deliver child protection services and achieve equitable outcomes for children, youth, and families across the province.

OACAS appreciates the government's commitment to amending and designing a child welfare system that is reflective and inclusive of needs and the experiences of children, youth and their families—specifically, improving access and well-being for First Nations, Inuit and Métis children, youth, and families. We support the government's participatory approach to design a multi-faceted, prevention-focused plan that is Indigenous-led. Indigenous children and youth have an inherent right to safety and well-being. These proposed regulatory and statutory amendments can build a more culturally appropriate, holistic and wraparound approach to service delivery for First Nations, Inuit and Métis children, youth and families.

Key Messages

- ANCFSAO supports Indigenous Child and Family Well-Being Agencies across the province to provide high-quality, community-based child welfare and family well-being services. As such, OACAS commends and supports the extensive work of the Association of Native Child and Family Service Agencies in Ontario (ANCFSAO). They have done significant work in consulting and engaging with MCCSS and Indigenous Well-Being Agencies to formulate their submission to the government on the proposed regulatory and statutory amendments.
- OACAS is committed to building our relationship with ANCFSAO and the Indigenous Well-Being Agencies across the province to ensure we are amplifying their voices and following their lead in this work.
- We want to offer our support and endorsement of the feedback and recommendations submitted by ANCFSAO. ANCFSAO supports Indigenous Child and Family Well-Being Agencies across the province to provide high-quality, community-based child welfare and family well-being services.
- We have heard from our own consultation that ANCFSAO is better positioned to submit a fulsome report that reflects the various Indigenous Well-Being agencies and their perspectives, concerns, and areas for strengthening the proposal.

- We support and endorse the feedback submitted by Indigenous Child and Family Well-being agencies that are OACAS members on behalf of their agencies and community members. Each Indigenous Child and Family Well-Being Agency provides culturally relevant services to the First Nations they serve, including using their service models, customary care agreements, and self-governance models. Because they are focused on honouring their communities' traditions, history, and customs and providing services rooted in their values, principles, and strengths, they are in the best position to speak to these policy amendments.

Recommendations

1. OACAS recommends that the ministry engage directly with the multiservice Indigenous Child and Family Well-Being Agencies (also societies) to carefully analyze and examine the impacts these proposed amendments could have. More specifically, any financial (i.e. decrease in programming and funding if external referrals to prevention-focused Indigenous services are mandatory) and administrative burdens.
2. We urge the government to consider implementing the recommendations to the proposed amendments submitted by any individual Indigenous Child and Family Well-being agencies that are OACAS members and ANCFSAO.
3. We urge the government to commit to continuing engaging directly with Indigenous Child and Family Well-being Agencies, First Nations, Inuit and Métis frontline workers, community members, Elders, and First Nations, Inuit and Métis youth and families with lived experience at all levels and stages of decision-making and ongoing evaluation.
4. The ministries' regulatory impact analysis anticipates there will be both costs and benefits (or cost savings) but provides no information or plan for funding these initial administrative costs. Therefore, we recommend that the government work with Indigenous stakeholders to create a complete budget plan and provide adequate funding and resources to implement these changes successfully.

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