

Purpose

The purpose of this document is to seek feedback on proposed regulatory changes under the Day Nurseries Act (DNA) and the Early Childhood Educators Act, 2007 (ECEA) to support the Government of Ontario's child care modernization agenda.

Please take the time to review this document and provide us with your comments. More information about how to respond is provided at the end of the document. Responses must be received no later than February 28, 2014.

The Vision

Ontario embarked on the biggest innovation in our early years system in decades by implementing publicly-funded full-day kindergarten (FDK) commencing in September 2010. In 2011, the government made a commitment to work with its partners to transition and modernize the child care system and create a vision for the system through both the:

- 2012 Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, and Working Together discussion paper.
 - The government received approximately 400 submissions from parents, child care operators, municipalities, First Nations, and partners across the province and gained valuable feedback which has informed on-going work and next steps.
- 2013 Ontario Early Years Policy Framework, which provides a vision for the early years and strategic direction to partners both inside and outside of government.

Key features of the vision are:

- an increasingly accessible and integrated system that is responsive and adaptable;
- high-quality programs that contribute to healthy child development which are centred around a view of children as competent, capable and curious and delivered by knowledgeable Early Childhood Educators (ECEs);
- choice and convenience for families by supporting a range of quality service options;
- a sustainable partnership between the Province and municipal service system managers, supporting collaboration with school boards, community agencies and other partners;
- a licensing framework for child care that is simplified, and flexible; and
- a suite of measures to support accountability and transparency.

Transforming Ontario's Child Care and Early Years System

A Framework for the Future: New Legislation

On December 3, 2013 the government introduced [Bill 143, the Child Care Modernization Act, 2013](#) that, if passed would amend three Acts. The legislation, if passed, would repeal and replace the DNA with the Child Care and Early Years Act, 2013 – a new, modernized legislative framework that would

govern the provision of child care and early years programs and services. The proposed legislation would help to achieve the vision articulated by the government.

In addition to the repealing and replacing of the DNA, the proposed legislation also includes amendments to the:

- Education Act to support access to developmentally-responsive before- and after-school programs for 6 to 12 year olds, building on the successful implementation of FDK;
- Early Childhood Educators Act, 2007 (ECEA) based on the advice we received this fall as part of the statutory review of the Act and to align with Bill 103, which amends the Ontario College of Teachers Act, 2006, taking into account the recommendations of the Honourable Patrick LeSage.

The introduction of the proposed Child Care Modernization Act, 2013 builds on the government's efforts thus far and is critical to providing for increased quality and safety of programs for children, increasing the capacity of the sector, and strengthening oversight and enforcement. For more information please go to the [news release](#).

In the event that the Legislative Assembly does not consent to the proposed legislation, the government will continue to reform the child care system within existing authority and seek approval of as much change as possible under the DNA.

Setting the Stage for Transformation

Proposed Changes to Regulation 262 under the DNA and a Proposed New Regulation Under the ECEA

The proposed changes provided for comment here address three priority areas: **program quality**; **access and flexibility**; and **health and safety**. In addition to proposed regulatory changes under the DNA, the government is also proposing a new regulation under the ECEA to respond to feedback from the 2013 discussion paper on the ECEA review regarding the composition of the College of Early Childhood Educators (CECE) council.

For more information on existing requirements set out in Regulation 262 and the ECEA, please see the **Background for more information**. Hyperlinks are also provided to the DNA and ECEA in the Resources/References section of this document.

Proposed Regulatory Changes - Enhancing Quality

Policy Statement to Guide Program Content and Educator Practice

Proposed Amendment:

As described in the Ontario Early Years Policy Framework, quality is a central component of the Province's vision for the early years. The government intends to provide guidance to educators in

providing quality early learning experiences based on the latest research about what has the greatest positive impact on children and their families.

The government is proposing to develop a provincial policy statement to guide program content and educator practice, which would be connected to the child care licensing framework in the future. This policy statement would be guided by a thorough understanding of a continuum of child development and grounded in the principles of Ontario's Early Learning for Every Child Today or ELECT (also known as the Early Learning Framework). The policy statement would further support program continuity between early years settings including child care, parent and family support programs, and elementary school.

The policy statement would also be accompanied by proposed complementary regulatory amendments that would further support the use of the ELECT/Early Learning Framework principles across the early years sector. Among others, these complementary amendments may include:

- Replacing the requirement in Regulation 262 to have a program of activities with a requirement to have a program that focuses on positive, responsive interactions; incorporates active exploration, play and inquiry; provides engaging materials/environments; and supports development in a holistic manner.
- Replacing the requirement in Regulation 262 to have a posted daily program plan with a requirement to communicate with parents on a regular and ongoing basis about what their children are experiencing related to active exploration, play and inquiry both indoors and outdoors.
- Simplifying the requirements for outdoor play (maintaining a minimum requirement) and providing more flexibility related to rest time to enable educators to use professional discretion to be responsive to the children in their care, and to support children's developing ability to self-regulate.

Why is this change being proposed?

Research has shown that high quality programs and services can have an extraordinary and long-lasting impact on children's learning and development. Having a provincial policy statement will help to provide quality across settings, guide educator practice, facilitate communication with parents and families, and increase continuity between early years settings and elementary school experiences.

Private-Home Day Care¹ (PHDC): Qualifications for Home Visitors

Proposed Amendment:

To enhance quality in home-based settings provided by licensed private-home day care agencies, the government is proposing to require Home Visitors working with PHDC agencies to hold a diploma in early childhood education and be registered with the CECE. Existing staff who do not have an ECE could be grandparented.

Why is this change being proposed?

Home-based child care is an important segment of the child care sector, and represents an area that could further expand child care options for parents, many of which prefer to have their child cared for

¹ Ontario has an agency model for home-based providers in the licensed child care system; the Ministry of Education licenses private-home day care (PHDC) agencies that contract with individual caregivers who offer child care out of their own homes. Caregivers are screened, approved, and supported by agency staff known as Home Visitors.

in a smaller, home-like environment and/or in settings that may offer more flexible hours than licensed centre-based child care.

Qualified Home Visitors with expertise in developmentally-responsive interactions, environments, and experiences are best positioned to support the provision of high quality home-based child care programs.

Recognizing the potential barriers this requirement could present for agencies which employ Home Visitors who do not hold this qualification, EDU could consider grandparenting those employed at the time the amendment is implemented.

Proposed Regulatory Changes - Increasing Access and Flexibility

Centre-Based Child Care: Same Age Groupings² for Children Under School Age³, Group Sizes and Employee to Child Ratios

Proposed Amendment:

Two significant developments in the last twelve years have changed the nature of preschool child care services and altered child care needs for many families in Ontario. They are also the major factors that have informed the government's proposal to adjust child care age groupings and some staff to child ratios:

- As of Dec 31, 2000, the federal government enhanced parental leave benefits, effectively increasing the total maternity and parental leave time to one year; and
- In 2010, Ontario began the rollout of FDK, and by September 2014, all 4 and 5 year olds can participate in publicly-funded full-day of kindergarten education beginning in September of the calendar year they turn 4 years old.

Key Facts and Data:

The Child Care Needs of Ontario's Families and the Nature of Services

Labour Market Participation and Child Care Entry Points:

- There are approximately 140,000 children born annually in Ontario.
- Labour market participation rates suggest that approximately 30% or approximately 42,000, of these children will spend their early years at home with a parent.
- Based on estimates from Employment Insurance (EI) data, a further 55,000 children will spend a full year of maternity and parental leave at home with a parent. The parents of these children may require child care at approximately 12 months of age;
- Based on estimates from EI data, the remaining 43,000 children will spend less than a year of maternity/parental leave at home. Many of these children will be from subsidy-eligible families.
- Some analyses suggest the desired age of entry to child care is between 8 and 11 months of age.

Licensed Space Information:

- There are approximately 10,000 licenced spaces for infants (currently 0-18 months) in Ontario.
- There are approximately 33,000 licensed spaces for toddlers (currently 18 -30 months).
- There are approximately 103,000 licensed spaces for pre-schoolers (currently 30 months-5 years).

² The term "same-age grouping" in this document refers to groups of children in child care programs organized by age/developmental stage.

³ The term "school age" refers to the category established for child care licensing and refers to children who are six years of age at the end of a calendar year and up to 12 years of age.

Developmental Needs of Children:

- A significant body of research indicates the importance of close relationships with primary caregivers, particularly for infants and toddlers. This emphasizes the importance of minimizing transitions among caregivers and settings for younger children in particular.
- Developmental differences generally become less significant as children age, so that for older children a wider range of mixed ages is more appropriate (for example the current pre-school age group that covers 2.5-5 years). Older children are also increasingly independent and require fewer periods of one-on-one care/supervision.
- The developmental needs of infants, toddlers and preschoolers are significantly different. That is why common instruments that measure program quality (e.g., the Infant/Toddler Environment Rating Scale [ITERS] / The Early Childhood Environment Rating Scale [ECERS], Toronto Operating Criteria, etc) use different scales to measure infant, toddler, and preschool programs.

Fee Information:

- Based on Ontario's 2012 survey of child care operators, the current median fees for preschool entry child care programs per day are: infant - \$50.00; toddler - \$42.30; and preschool - \$38.00.

Recognizing these facts and changes, the government is seeking feedback on the following proposed alternative age groupings and ratios to ease entry to licensed child care, meet the developmental needs of children, reduce costs to families and the subsidy system, and more effectively use existing infrastructure. This model below could be used in addition to current age groupings/staff to child ratios and group sizes currently set out in Regulation 262 (see **Background**):

Proposed Model

Age Group	Employee to Child Ratio	Maximum Group Size	Number of Employees Required with Maximum Group Size
0-1 years	1:3	10	3 (minimum 1 of 3 staff is a registered ECE)
1-2 years	1:5	15	3 (minimum 1 of 3 staff is a registered ECE)
2-4 years	1:8	16	2 (minimum 1 of 2 staff is a registered ECE)
		24	3 (minimum 2 of 3 staff are registered ECEs)
4-5 years	1:13	26	2 (minimum 1 of 2 staff is a registered ECE)

Under this proposed model, requirements for the school-age group (6-12 years) would remain consistent with Regulation 262. There would be no plans to alter the required space per child or to make other fundamental changes to the existing physical space requirements for particular age groups. Regulatory flexibility could be sought to address any impacts on other requirements tied to existing age groupings.

Why are these changes being proposed?

The government proposes to introduce these age groupings alongside the existing age groupings; operators would be able to choose either scheme. Maintaining the existing age configurations alongside the new age configurations would provide flexibility for child care centres to adapt their programs to best suit the ages of entry and transition points for the families they serve (e.g., wanting to minimize transitions, a centre that regularly takes infants at 9 months may wish to run its infant program to 18 months; while a centre that regularly takes infants at 12 months may wish to offer a program for children 1-2 years of age). In both cases, these choices would be made to provide for a longer interval between program entry and transition to the next age group.

The proposed flexible model would also:

- Ease entry points for families, as the 43,000 families who need care before 12 months of age may no longer have to compete with the 55,000 families who want care at 12 months of age;
- Maintain separate age groupings for infants, toddlers and preschoolers while maintaining a larger age spread at the preschool level where it is most appropriate. This approach responds to the developmental needs of children;
- Make more effective use of existing staffing models and physical space to support a smooth, uninterrupted and cost-effective transition to new age grouping configurations;
- Potentially reduce what parents/families pay in child care fees, and subsidy costs for children up to age 6 years, by approximately \$3,500⁴; and
- Harmonize ratios and groups sizes for 4 and 5 year olds by creating consistency with FDK ratios (1 educator to 13 students) and support greater access to licensed before- and after-school spaces, creating a seamless and integrated program with FDK for children and families.

Centre-Based Child Care for School Age Children: Age Groupings, Ratios, Group Size, and Staff Qualifications

Proposed Amendment for Age Groupings:

In addition to the school age group requirements currently in place, the government is proposing the following model be considered to support more licenced child care options for school-aged children:

Age Group	Employee to Child Ratio	Maximum Group Size	Number of Employees Required with Maximum Group Size
6-8 years	1:15	30	2 (minimum 1 qualified staff)
9-12 years	1:20	20	1 (1 qualified staff)

Proposed Amendment for Staff Qualifications:

- The government is proposing to allow operators to hire individuals who are not registered ECEs but are qualified in a related field for programs serving school age children:
- For programs using the existing 6-12 grouping, operators could employ individuals with an ECE diploma or a degree/diploma in a relevant field of study (e.g., child/youth development, education, recreation/leisure) and approval from a Director would not be required for such non-ECE candidates. If the operator employs a non-ECE as the primary staff person, to ensure that non-ECE staff are able to implement a high-quality program for younger school-aged children (ages 6-8), the province could require that staff have regular access to an ECE.
 - If a child care operator chooses to use the proposed separate 6-8 years and 9-12 years groupings, each grouping could be staffed by a registered ECE or an individual with a degree/diploma in a relevant field (see above). Additionally:
 - **for the 6-8 group**, if the operator employs a non-ECE as the primary staff person it is proposed that employees have regular access to an ECE (see above);
 - **for the 9-12 model**, operators would be encouraged to include an engaged youth (13-19 years old) along with the qualified staff member to assist in the provision of program.

⁴ The estimated savings were derived by: 1) initiating the median parent fee for toddlers to begin at age one and the preschool fee to begin at age two; and 2) calculating total cost over the larger population of JK and SK children.

Why are these changes being proposed?

Until adolescence, parents often want their children to take part in supervised activities outside of school and the home. Licensed child care provides opportunities for older children to develop skills that support their transition to adolescence. The proposed 6-8 and 9-12 age groupings acknowledge the distinct needs of these groups and allow licensed operators to offer developmentally-responsive programs. The expanded criteria for staff qualifications would also be consistent with practices used in child care settings and other children's programs, would offer greater flexibility for operators, and would simplify the licensing process.

For programs for 9 to 12 year olds, adult supervision is important but it is also important for older children/pre-teens to relate to youth who can act as mentors, leaders, and friends. Having youth participate in licensed child care programs for older children supports youth in becoming involved and engaged in their communities and prepares them for the future. For more information on the benefits of engaging youth please click go to this [link](#).

Centre-Based Child Care: Multi-Age Groupings

Proposed Amendment:

The government is proposing that an alternative to the current requirements for children under four years of age be developed that would support greater access to licensed child care options across the province. The proposed alternative multi-age grouping models are:

Age Group	Employee to Child Ratio	Maximum Group Size	Number of Employees Required with Maximum Group Size
Model 1 0-2 years 2-4 years	1:4 1:6	Max. total = 20 (No more than 8 children under 2 years of age)	4 employees (minimum 2 registered ECEs)
Model 2 0-1 years 1-2 years 2-4 years	1.3 staff to 3 children 1.3 staff to 5 children 1.3 staff to 8 children	(max 3) (max 5) (max 8) Max. total = 16	4 employees (minimum 2 registered ECEs)

Operators would be required to provide developmentally-responsive interactions, experiences and environments, as well as sufficient space for all children in the group (e.g., a large room sub divided with half-walls/partitions to allow educators to maintain sight-lines).

The government could consider limiting use of these models to child care centres which receive enhanced resources from Consolidated Municipal Service Managers/District Social Services Administration Boards to address unique geographic/demographic challenges.

Why is this change being proposed?

Multi-age groupings may be particularly important in areas of the province with dispersed and/or small population where child care options are limited. This model could play a key role in supporting the unique and diverse child care needs of various cultural and linguistic communities, such as Aboriginal, First Nations, Métis, Inuit, as well as Francophone communities.

Siblings and family members would also have the opportunity to participate together in the same program and children can interact with other children of all ages as they might in a family or

community setting. Such groupings benefit both older and younger children by supporting pro-social behaviors and cognitive development.

Private-Home Day Care (PHDC): Children's Age Limitations

Proposed Amendment:

PHDC home-based providers are able to care for 5 children under ten years of age, in addition to their own children. Providers are required to include their own under the age of 6 years so that there are only five children under six years of age in attendance and they must maintain other age restrictions as outlined in the current regulation. The government is proposing to remove the rule which limits providers to 3 children under 3 years of age. Private-home day care agencies would continue to use discretion when determining the total number of children a provider can look after, based on the needs of families, the qualifications/experience of the provider, and the physical characteristics of the home.

Why is this change being proposed?

More flexibility for PHDC providers is required to address the reality of FDK, which has significantly reduced the demand for care outside of school settings for 4 and 5 years olds. Home-based child care provided by a licensed PHDC agency is an important part of the sector and many parents prefer to have their child cared for in a smaller, home-like environment. The proposed change would improve access to high-quality, home-based programs by removing barriers and contributing to their viability. Increased spaces in home-based settings could also provide options for families who require care outside of typical child care centre operating hours.

Proposed Regulatory Changes – Enhancing Health and Safety

Criminal Reference Checks (CRC) and Vulnerable Sector Screening (VSS)

Proposed Amendment:

Building on current licensing policies and requirements that child care service system managers, child care operators, and school boards already have in place, the government is proposing to amend Regulation 262 to require licensed child care operators to include a requirement for a CRC including VSS in their policies and procedures for:

- All full- and part-time employees, volunteers, and any other persons having direct, unsupervised contact with children in child care centres;
- All individuals contracted with a licensed private-home day care (PHDC) agency and PHDC Home Visitors; and
- All adults (over 18 years) residing in the home of a PHDC provider (e.g., provider's child/ren or spouse)

In addition, an offence declaration signed by these individuals could be submitted to the operator annually thereafter and regular updates to the CRC/VSS could be requested (e.g., every five years).

The Ministry of Education would also require a CRC/VSS for individuals applying for or holding a child care licence.

Why is this change being proposed?

Due to their age and dependency on adults, children are considered a vulnerable sector of society. To support the safety of children in regulated child care settings, the government supports the use of a required CRC/VSS process which is grounded in regulation and tailored to the child care sector.

First Aid Training

Proposed Amendment:

The government proposes to create a requirement for all child care centre supervisors, at least 50% of full-time employees working in licensed child care centres, and all PHDC home providers to have current first aid certification from a recognized training program. A transition period would be provided to allow time for individuals to obtain the required training. CPR training would be recommended but would not be required.

Why is this change being proposed?

A regulatory requirement for first aid training and recommendation regarding CPR would support children's safety in licensed child care settings by ensuring employees and caregivers have the necessary skills to effectively respond to injuries and emergencies until help arrives.

Nutrition Requirements

Proposed Amendment:

Nutrition requirements set out in the Regulation 262 are significantly out-dated. The government is proposing to require licensed operators to follow the latest version of Canada's Food Guide, have menus reviewed by a registered dietician, and establish policies/procedures describing their approach to providing high-quality meals/snacks and positive meal time experiences.

Why is this change being proposed?

Canada's Food Guide is routinely updated to reflect current research, new food processing methods, and advice from experts. Using the latest guide encourages children to be exposed to a variety of high-quality food and is consistent with direction provided to licensed operators from Ontario's Public Health units.

New Regulation under the Early Childhood Educators Act, 2007

Proposed Amendment:

It is proposed that a new regulation specify which sectors of society must be represented among the Public Appointees to CECE Council. This would include at least one person representative of Ontario's Aboriginal, First Nation, Métis or Inuit communities and at least one person representative of Ontario's Francophone community. Additionally, the proposed regulation would require best efforts to ensure that persons representing the following sectors would be appointed to the Council: 1) Persons from the public education sector who have expertise in primary education; 2) Persons from post-secondary educational institutions who have expertise in early childhood education; 3) Parents who have children in the licensed child care system; 4) Persons who have professional expertise with respect to children with special needs; and 5) Persons who employ early childhood educators.

Why is this new regulation being proposed?

Requiring broad representation on the College's Council would respond to stakeholder feedback, align with similar requirements for other professional bodies (e.g., Ontario College of Teachers), and help to ensure that the CECE makes decisions that are informed by the wide variety of settings, cultures, and languages in use across Ontario.

Conclusion

Transforming child care in Ontario will take time and requires a phasing-in of changes to allow for a smooth transition and minimal disruption to service system managers, child care operators, and children and their families. While work is underway to seek approval of the transformation of the legislative framework for the child care and early years system, in the near-term, the government is proposing to use its existing authority to make regulatory changes in support of the priority areas of quality, health, safety and flexibility as an early step to support proposed broad system transformation.

To acknowledge the establishment and role of the CECE, it is proposed that provisions in Regulation 262 referring to ECEs would also be amended to refer to registered members of the CECE in good standing on the College Register.

Following this consultation period, feedback from the public and our partners will be considered prior to seeking any regulatory changes. Effective dates would take into account the anticipated impact on operators and more substantial changes would benefit from a longer implementation period.

Your Advice is Important

All interested parties are encouraged to provide feedback on the proposed regulatory changes with a view to supporting children's health and safety while they attend high-quality child care settings and supporting parent choice and child care operator viability.

The Ministry of Education values the unique and diverse perspectives from parents/families and broader child care and early years partners. Please provide the Ministry of Education with your comments no later than February 28, 2014.

You can send your response by e-mail to: CCGE_modernization@ontario.ca

Alternatively, you may wish to send your response by regular mail to:

Child Care Modernization
c/o Early Years Division
Ministry of Education
900 Bay Street, 24th floor Mowat Block
Toronto, ON M7A 1L2

Thank you for taking the time to review this document and provide feedback. Please note that you will not receive a formal response to your comment. Please continue to stay engaged with news about child care in Ontario by visiting www.ontario.ca/childcare.

Resources/References

Bill 143, the Child Care Modernization Act

http://www.ontla.on.ca/bills/bills-files/40_Parliament/Session2/b143.pdf

Day Nurseries Act:

http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90d02_e.htm

Day Nurseries Act - Regulation 262:

http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900262_e.htm

Early Childhood Educators Act, 2007:

http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_07e07_e.htm

Early Childhood Educators Act Review – 2013 Discussion Paper:

<http://www.ontariocanada.com/registry/showAttachment.do?postingId=13442&attachmentId=21228>

Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together (Released June 2012):

http://www.edu.gov.on.ca/childcare/Modernizing_Child_Care.pdf

Ontario Early Years Policy Framework (Released January 2013):

<http://www.edu.gov.on.ca/childcare/OntarioEarlyYear.pdf>

BACKGROUND: Current Select Requirements Set Out in Regulation 262 Under the Day Nurseries Act, Policy, and the Early Childhood Educators Act, 2007

Section/Source	Current Requirements
Program Sections including 14, 52-54, Regulation 262	Operators post a program of activities and provide play materials that are developmentally appropriate.
Staff Qualifications Section 58-61, Regulation 262	<p>PHDC Home Visitors: PHDC Home Visitors must have completed a post-secondary program in child development and family studies; have at least two years of experience working with children who are at the same age/developmental levels as the children enrolled with the hiring PHDC agency; and is approved by a Director (or is otherwise approved by the Director).</p> <p>Centre-based Staff Qualifications: Every operator must employ at least one person for each age group who holds a diploma in Early Childhood Education (ECE), an academic qualification considered equivalent, or is otherwise approved by the Director.</p>
Age Groupings, Ratios, Staff Number, and Maximum Group Size Sections 55-57, Schedules 3-4, Regulation 262	<p>Centre-based same-age groupings and ratios:</p> <ul style="list-style-type: none"> • Under 18 months of age: 1:3/3 staff:child ratio; max. 10 • 18 - 30 months: 1:5 staff:child ratio; max. 15 • 30 months – 5 years: 1:8 staff:child ratio, max. 16 • 44 – 67 months group: 1:10 staff:child ratio, max. 20 • 56 months - 67 months group: 1:12 staff:child ratio, max. 24 • 68 months -12 year old group: 1:15 staff:child ratio, max. 30 <p>PHDC providers: A PHDC agency provider can have a maximum of five children under ten years of age not including his/her own children. The provider's own children under 6 years of age are counted in the maximum of five children under six years. Additionally, there can be no more than 2 children under 2 years of age and no more than 3 children under 3 years of age. Additional restrictions exist for children with special needs.</p>
Criminal Reference Checks: Policy	Set out in 1995 MCSS policy – specifics not outlined in Regulation 262.
First Aid Section 60 (c), Regulation 262	Resource consultants working with children with multiple special needs, who are directly employed by child care operators, are to have current, standard first aid training.
Nutrition: Section 39-43, specifically 41 (1) and (2) and Schedule 1-2 (food groups, serving amounts) Regulation 262	Food group and service sizes based on age of child are dated to 1977.
Early Childhood Educators Act, 2007	The ECEA requires that the Council of the College of Early Childhood Educators include 14 ECEs who are members of the College and are elected to represent different areas of the province, and ten individuals who are not College members and are appointed by the Lieutenant Governor in Council to represent various sectors of Ontario society. Currently these “sectors of Ontario society” are not defined, and while best efforts are made to include individuals from various communities, there is no requirement in place for representation from specific communities.