

**Response re: Regulatory Registry Consultation Document supporting the  
Renewed Early Years and Child Care Policy Framework under the *Child Care and  
Early Years Act (CCEYA), 2014***

**Posted October 2<sup>nd</sup> 2017**

**Association of Early Childhood Educators Ontario**



*Introduction*

The AECEO is the professional association for ECEs and its primary purpose is to support early childhood educators in their professional practice and advocate for respect, recognition and appropriate wages and working conditions for *all* ECEs. Our members are working throughout Ontario in programs for young children and their families, including regulated childcare, full-day kindergarten, family resource programs and support services for children with disabilities.

As it is our mission to act on behalf of Ontario's registered early childhood educators (RECEs), our response to the Regulatory Registry Consultation Document supporting the Renewed Early Years and Child Care Policy Framework under the *Child Care and Early Years Act, 2014* (CCEYA) focuses mainly on issues of concern to RECEs. We commend the government for its initiative to expand the current childcare system in Ontario, but remain concerned about the fundamental reliance of the existing and potential system on a poorly paid, over-burdened yet increasingly professionalized workforce. We feel that creating a system where workforce issues are a central rather than peripheral pillar of planning is necessary to ensure Ontario's children and families do not just have access to a childcare space, but high-quality care and education programs. This response thus commends the government for removing the Schedule 2 optional approach to age groupings and ratios which would have seen younger children in larger group sizes, creating a more stressful work environment and ultimately decreasing the quality of individualized, responsive care that children deserve.

## *E. Age Groupings and Ratios*

As indicated above, we believe the proposed Schedule 2 regulations were inconsistent with the government's Early Years Vision to "ensure that Ontario's children and families are well supported by a system of responsive, high-quality, accessible, and increasingly integrated early years programs and services" and not in the best interests of children and registered early childhood educators. We recommended that the Ministry revoke Schedule 2 ratios and group sizes as without the necessary support and increased funding from the Ministry, the proposed approach was not acceptable for children and would not result in quality environments that support children's healthy development.

While we support the development of innovative and responsive group sizes and ratios, we believe these must be created in meaningful consultation with early years' stakeholders, centres and, most importantly, the early childhood (EC) workforce. We remind the Ministry that research demonstrates that there is an added negative impact of poorer ratios and group sizes that challenges staff morale, interferes with retention, weakens working conditions and diminishes interactions with young children. Furthermore, we urge the Ministry to resist future changes to group sizes and ratios that do not include appropriate funding and support for registered early childhood educators and staff.

The AECEO would like to reaffirm its position in support of increasing the number of qualified staff included in *existing* ratios and group sizes ("Schedule 1"). The Ministry and the AECEO appear to be in solid agreement that the increased educational qualifications of staff are essential for positive, responsive, meaningful interactions with children. The AECEO supports the government's plan to enhance the Qualifications Upgrade and Leadership program to help untrained staff attain their ECE credentials. We celebrate the government's current commitment to a workforce strategy and we have called for the necessary funding for RECEs to pursue now required Continued Professional Learning through the College of Early Childhood Educators. It is quite simply not affordable or ethically responsible to continue to increase the professional expectations of RECEs without providing the infrastructure/resources to do so. We will thus continue to work with the Ministry to increase the professional resources that RECEs and staff have access to in order to fulfill their professional responsibilities. As always, the AECEO remains wholly committed to building the *quality* of Ontario's childcare system along with increasing the *quantity* of spaces. We feel all young children deserve the opportunity to learn, explore, and express themselves in responsive environments with well-educated staff rather than simply being in a 'safe place' while parents are at work.

## *A2. Financial Records*

The AECEO supports the Ministry's overall attempt to ease administrative burdens on childcare staff by reducing redundant administrative tasks, but we are concerned with the removal of the current requirement that licensees retain financial records. The removal of financial records

could impact children and staff's health and safety and/or the quality of care and education provided. Within the current market model of childcare provision, childcare centres face tremendous financial constraints and struggle to balance budgets and remain operational. While not-for-profits (NFP) have a built-in financial accountability mechanism inherent in the structure of these organizations – mainly a board of directors to which centre directors/supervisors are accountable – many childcare centres operating in Ontario have little to no oversight of their financial management processes.

Currently we know that about a quarter of childcare centres in Ontario are operated in the for-profit (FP) auspice, and expansion within the FP sector is occurring rapidly. As has been well established elsewhere (Cleveland and Krashinsky, 2005; Langford, 2011), making a profit in the childcare sector typically means cutting corners on quality and sometimes violating health and safety standards (Richardson, 2017). FP centres have an explicit motivation to not put monies back into the program and instead demonstrate a profit margin. We know that financial mismanagement occurs in the childcare sector as is shown by disciplinary hearings with the College of Early Childhood Educators (CECE). We believe it is a responsibility of the Ministry to ensure that all childcare centres are using funds appropriately and responsibly without compromising the quality, health and/or safety of programs or children.

Finally, it must also be noted that the provincial government is currently directly providing funding to childcare centres through the provincial wage enhancement grant for early childhood educators and staff. The government therefore has a *responsibility* to ensure that Ontario's children and families are benefiting from the monies. With the knowledge that financial mismanagement (intentional or not) has occurred in the past and that there are explicit motivations to make a profit within our current market model, removing financial records from regulation is problematic. We recommend further review and discussion regarding this aspect of the proposed regulatory changes.

### C. Recreation Regulations

We are also concerned about the changes to regulations pertaining to the operation and funding of recreation programs. Our primary concern is that the proposed regulation changes will permit recreation programs to enroll 4-year-olds, further destabilizing the already fragile childcare sector in Ontario. From a childcare operator's perspective, this is highly problematic as childcare providers will be required to provide care/education for younger children to remain viable and, as has been well established, providing quality care to younger children is much more expensive given the necessity of more qualified staff and smaller ratios and group sizes. A similar unintended policy consequence occurred as a result of full-day kindergarten, where more and more of operator's viability was absorbed by programs outside the childcare sector while childcare programs struggled to remain operational. This alone is concerning, but that the proposed changes permit recreation programs to receive the limited childcare fee subsidy monies – a primary source of stable revenue for many existing childcare centres – is problematic. Within

the current market system, this will result in fewer revenue sources for childcare centres, with higher operational costs. The market-based solution of increasing parent fees is also not desirable or realistic given existing parental fees for childcare are already unaffordable, or completely unaffordable for 75% of families (Cleveland, Krashinsky, Colley & Avery-Nunez, 2016). While we appreciate this is not the intention of the government, we remain concerned that this will be the impact of the proposed regulatory changes as they currently stand.

It is important to point out that the recreation program changes are also extremely concerning for RECEs in Ontario. On a very basic level, RECEs are losing potential employment opportunities as 4-year-olds can be cared for in recreation programs with less qualified staff. Many RECEs who are currently employed in part-time, split-shift positions during most of the year consider full-time work in the summer their “saving grace”. However, if summer camps are permitted to provide full-time programs for 4-year-olds with no qualified staff (i.e., RECEs), full-time summer employment opportunities for RECEs are also compromised. This reality will only exacerbate already serious recruitment and retention issues at a time when recruiting qualified ECE professionals into the field is a pressing priority.

Our final concern comes down to the reality that parents (“consumers” in the current market model of childcare) may not be aware of the key differences between “recreation” and “childcare” programs. Parents of young children are often desperate to find care/education programs and may not be aware that different regulatory standards – including the qualifications of the workforce – are significantly different in each type of program. Parents deserve real options in accessing quality services. There is an inherent level of risk that the government takes when permitting more and younger children to be cared for by unqualified staff. We suggest such a shift is not minor and must be seriously reconsidered within the current state of Ontario’s childcare system.

## Conclusion

The AECEO supports the Ministry of Education’s decision to remove Schedule 2 from the regulations. We feel our concerns about Schedule 2 have been heard and appropriately responded to. However, we remain concerned that the many outstanding professional concerns of the workforce remain peripheral rather than central to the development and implementation of regulatory changes and broader system expansion. We are also concerned about the decreased financial accountability of childcare programs – particularly considering the recent and rapid corporate child care expansion in Ontario. Finally, we find the proposed changes to the funding and operation of recreation programs highly problematic in that they have not taken into consideration the viability of childcare centres, working conditions/opportunities of RECEs and level of risk to government, parents, and children. We remain open and willing to work with the government regarding policy planning and development that prioritizes the well-being and opportunity of Ontario’s children and families, and those working hard to provide quality early care/education experiences for them.

## References

Cleveland, Krashinsky, Colley, and Avery-Nunez (2016). *Technical Report: City of Toronto Licensed Child Care Demand and Affordability Study*.

<https://www1.toronto.ca/City%20Of%20Toronto/Children's%20Services/Files/pdf/T/Toronto%20Demand%20&%20Affordability%20Study%20-%20technical%20report%202016.pdf>

Cleveland, G. & Krashinsky, M. (2004). *Financing Early Learning and Child Care in Canada*. Paper presented at the Child Care for a Change: Shaping the 21st Century, Winnipeg, November 12 - 14, 2004. <http://www.childcarecanada.org/documents/research-policy-practice/04/11/financing-early-learning-and-child-care-canada>

Langford, T. (2011). *Alberta's day care controversy: From 1908 to 2009 and beyond*. Edmonton, Alberta: Athabasca University Press.

Richardson, B. (2017). Taking Stock of Corporate Childcare in Alberta: Licensing Inspection Data in Not-for-Profit and Corporate Childcare Centres. In R. Langford, S. Prentice, & P. Albaense (Eds.), *Caring for Children: Social Movements and Public Policy in Canada*. Vancouver, BC: University of British Columbia Press.