

COALITION ONTARIENNE POUR
*de meilleurs services
éducatifs à l'enfance*



ONTARIO COALITION FOR
Better Child Care

Ontario Coalition for Better Child Care
response to Regulatory Posting Related to
Child Care and Early Years Act 2014

May 11, 2015

Introduction

The Ontario Coalition for Better Child Care is the province's central advocacy group for a universal, affordable, high quality, public and non-profit system of early childhood education and care. Formed in 1981, the OCBC is a member organization comprised of child care centres, provincial groups and individuals from all across Ontario. Our members are child care workers and parents, centre directors and trade unionists, and most importantly we are people who care about child care.

We are writing in response to the Regulatory Registry Posting related to the Child Care and Early Years Act, 2014 (CCEYA) and the work of the Minister of Education's Early Years Advisory Committee. We wish to share our concerns not only about the few regulatory proposals contained in this posting, but more broadly to express our unease with the current approach to developing these regulations, and the absence of broader action to address the child care crisis in this province.

The Ontario government has articulated a vision for early years in the province. It is reiterated in this most recent regulatory posting: *"to ensure that Ontario's children and families are well supported by a system of responsive, accessible and increasingly integrated early years programs and services."* This is an admirable vision and one that we share. What is the government's plan to make this vision a reality? We need a clear and focused action plan with targets and timetables to move from this grand vision to concrete child care system change.

In the absence of concerted action, Ontario's child care continues to struggle with the realities of three linked child care crises:

- **Unaffordable parent fees:** Ontario has the highest and least affordable parent fees in the country. For many families paying for child care is a second mortgage.
- **Centre closures:** What started as a rash of closures following the introduction of full-day kindergarten, has continued with many high quality non-profit centres shutting their doors and municipalities walking away from their long standing role as service operators.
- **Low pay for the child care workforce:** Despite the recent wage enhancement, Ontario's child care workforce continues to be underpaid. Piecemeal approaches that attempt to address wages on their own without addressing the system as a whole will be ineffective.

General comments

We understand that the government is taking a staged approach to regulation development. This staged approach makes it difficult to respond to proposals, as we do not know what is to come in future stages. For example, are the regulatory changes about children with special needs all of the proposals on this topic, or only the beginning? We are thus reluctant to address some proposals in the current regulatory posting. Many colleagues and members in the child

care community that we have spoken with share this reluctance. It is difficult to respond at this stage when we can see only part of the picture. With that said, we would like to share some of our most pressing concerns about the current regulatory posting.

Ratios and group size in before and after school care

We are particularly concerned that ratio proposals from the previous posting (2014) that would weaken adult-child ratios in before and after school programs are once again under consideration. We reiterate our position that these proposals represent a threat to quality.

To repeat one of our recommendations from the last round of regulatory proposals “changes to ratios and group size must be considered within the context of other policy elements — early childhood training, pedagogy, facility considerations, safety and financing—that is, within a full policy process with a goal of real transformation.”

Specifically, the proposal to allow for a ratio of 1 staff person with 20 school age children ages 9-12 years may be consistent with class sizes during the school day but it does not support quality in licensed child care. Licensed child care differs substantially in location and available resources – and should differ in programming approach - from schools in the public education system. This proposal is a threat to the quality of school-age programs and does our children a disservice.

In addition, we reject the concept of ‘alternative ratios’. The proposal to allow operators the option to adopt the new ratios and group sizes or continue to use the existing more stringent requirements will not work in the current child care market. In a child care market, we know that some programs may make ratio/group size decisions based on revenue building, cost cutting and profit, rather than support of quality. Ratios and group sizes in child care should be based on research evidence to support quality, not the ‘bottom line’. Alternative ratios would establish two-tiers of quality in licensed child care programs.

Again, more information is needed to comment meaningfully on this section of the posting. For example, details of new school space requirements that are mentioned are necessary to respond fully. We are hopeful that forthcoming proposals will provide child care programs in schools with access to the same space throughout the full education and care day.

Enhancing quality

We are supportive of efforts to enhance quality in child care in Ontario, and the regulatory proposal to establish a provincial framework for programming and pedagogy is admirable. However, in pursuing the goal of enhancing quality it is essential to put in place a process of research and evaluation to better understand the current quality of programs and evaluate the effectiveness of government efforts to “enhance quality”. We do not know the overall quality of child care in Ontario currently. More data, research and evaluation is needed.

In addition, it is important to echo the call from our partner organization the AECEO that the “goal of enhancing quality cannot be left up to the good-will of ECEs and child care providers, chance or market forces.” ECEs need concrete resources that improve their working conditions and compensation.

Children with special needs

We do not support the proposal to eliminate the current limit placed on the number of children with special needs that can be placed in a regulated child care provider’s home without a comprehensive strategy to guarantee inclusive child care spaces for children with special needs in both centre and home-based settings.

If removing the limit is the only measure the government is proposing, it seems a particularly disingenuous way of “increasing access” to child care spaces for children with special needs. It is alarming that twice in the regulatory posting the language “increasing access to” is used as code for watering down regulations. Increasing access to child care is an admirable goal, but cannot be accomplished efficaciously by weakening ratios.

The CCEYA states that it is “a matter of provincial interest that there be a system of child care and early years programs and services that respects equity, inclusiveness and diversity in communities and the particular qualities of children with disabilities.” (CCEYA sec.49.1.f.ii) The current regulatory proposals on this topic do not go nearly far enough in ensuring such a system for children with special needs.

More information needed

More detail is needed to adequately respond to proposals regarding Licensing Clarity, Primary Purpose of a Program and Space Requirements. At a minimum it should be clear to the whole child care community what the general division of stages is and whether proposals on a posted topic represent all or only some of the planned regulations.

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