

Child Care and Early Years Act Policy Brief #4

Authorized Recreation and Skill Building Programs

This policy brief is part of a 4-part series intended to summarize community consensus, research and policy recommendations on the Ontario's government's proposed regulatory changes to the *Child Care and Early Years Act* (CCEYA). This brief responds to a proposal to allow specified Authorized Recreational and Skill Building Programs to operate for more than three consecutive hours a day.

Community Survey Results

In a community survey of 2,400 ECEs, operators, and families:

- 48% of respondents were opposed to the proposal with only 21% in favour.
- A large portion of the respondents were confused about the proposal, with 31% unsure

Organizational Consultation Responses

"Compass Early Learning and Care does not support the removal of the 3-hour rule for specified authorized recreational programs. This again would create a two-tier system where the families who can afford the higher quality licensed child care program would pay for it. Those who cannot and don't qualify for subsidy would be forced to have their children in the free or low-cost recreational program with unqualified staff." - Compass Early Learning and Care, Peterborough.

"If this change is to address a critical shortage of [school-age] programs, it's important to look at the current landscape. The CCEYA and Education Act already set out that the school board must provide or partner with a third party provider to offer before and after school programs where there is viability. At least in this region, before and after school programs are not allowed to run a waiting list....Since COVID-19 hit, before and after school programs are running at or below 50% capacity." - Owl Child Care Services of Ontario, Waterloo.

"OPSBA supports equity of access and opportunity for families but we do want to flag a concern regarding multiple operators within one school who may compete for childcare services where the lower cost option was the determining factor for a family." - Ontario Public School Boards Association.

"Forcing not-for-profit child care operators to compete with recreational and skill building programs that are not required to hire registered ECEs will have a detrimental effect on both the quality and the viability of child care programs. This will result in downwards pressure on ECE compensation, as not-for-profit operators struggle to compete in a two-tiered system, further aggravating existing recruitment and retention challenges in the sector. Before and after school programs should be run by registered ECEs who have the necessary qualifications to provide quality programming to children. Instead of lowering the bar for these programs, the government should focus its energy in improving ECEs' compensation and working conditions to address gaps in recruitment and retention." - Elementary Teachers' Federation of Ontario.

Summary of Evidence /Research

The three-hour limit on Authorized Recreation and Skill-Building programs was put into place by the Ontario government to avoid the creation of a two-tier system of before- and after-school programs, where licensed child care programs that are held to more rigorous quality standards (with their associated costs) operate alongside (and in direct competition with) more cheaply-operated recreation programs that do not have to meet the same programming or staffing criteria. The removal of the three-hour limit, absent another solution to avoid the creation of a two-tier system, will lead to inequities for families.

Recommendation

The AECEO and OCBCO urge the Ministry of Education not to remove the three-hour limit on recreation programs, without a detailed plan to address issues of equity. A better route would be to do a full examination of how to plan and create a seamless system of school-age child care that meets the needs of all families. We support the inclusion of Ontario Federation of Indigenous Friendship Centres in being granted authority to operate Authorized Recreation and Skill Programs, and also acknowledge this is not sufficient to ensuring Indigenous led-programs across both urban and First Nation communities.