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Child Care Modernization
c/o Early Years Division
Ministry of Education
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As the Ontario government continues to “Modernize Child Care”¹, Bill 143 has now replaced the ay Nurseries Act (DNA) and has amended the Education Act and Early Childhood Educators Act.

We commend the government for this important initiative, which we anticipate will make strides to improve the quality of life for children, parents and the early childhood education workforce. Many of the Phase 1 regulations demonstrate this commitment to children and families.

Similar to Phase 1, the ministry is currently engaged in a community consultation process to seek input on Phase 2 proposed regulations, which focus on the following key areas:²

- Service system management and funding
- Licensing clarity
- Enforcement
- Tiered Licensing – term of a license
- Licensing standards
- Licensing fees
- BASP 6-12: Extended Day and Third Party Programs
- Miscellaneous regulations

¹ http://www.edu.gov.on.ca/childcare/Modernizing_Child_Care.pdf

² https://www.ontario.ca/document/child-care-rules-child-care-and-early-years-act?_ga=1.83563090.55795874.1458759246

The Atkinson Centre convened a number of community stakeholders through its Task Force, to solicit views on the proposed regulatory changes. Below represents the general consensus.

Authorized Recreation and Skill Building Programs

We concur that camp programs serving children four years of age and younger require the oversight licensing provides. The inclusion of private schools under legislation will ensure they are exposed to the same level of scrutiny as other educational programs.

Licensed Home Care

There is wide support for the requirement that home visitors have ECE qualifications. However, the proposal to remove the cap on the number of licensed home care providers that agency home care visitors are required to supervise is inconsistent with the focus on quality promoted in *How Learning Happens*³. Removing the cap will reduce interactions to a relationship that only addresses compliance. We believe it is prudent that the ministry recognize the value of these visits for the purpose of professional development, support and quality assurance.

Recommendation: Maintain the cap of 25 providers per home visitors.

Age Groupings, Ratios, Maximum Group Size, Qualifications, and Family Groupings

We are pleased that the ministry recognizes the critical role of early childhood educators in the delivery of quality programs and services. Increasing the density of qualified staff in childcare programs, coupled with the recent hourly wage enhancements are important steps

Expanding the staff qualifications related to older school age children is appropriate given the developmental needs of this age group.

We do however have concerns about the proposed changes to age groupings. The proposed grouping for infants – 0-12 months will be a disincentive to maintain programs for this age group. This restricts the child care access of the most vulnerable families whom typically do not qualify for the one-year parental leave. Adding another age group also exacerbates the bottleneck centres already experience as children age up into the next group. Most importantly, the new grouping inserts yet another transition, with a new environment and new set of

³ <https://www.edu.gov.on.ca/childcare/HowLearningHappens.pdf>

caregivers, that a small child must adapt to. This frustrates the promotion of deep relationships between parents and children with educators and is contrary to good pedagogy.

Recommendation: The following table suggests new age groups, staffing and group sizes. It is based on our consultations and is designed to reduced transitions for children, enhance quality by increasing the numbers of qualified staff required and supports the financial viability of programs serving infants to preschoolers.

Programs serving infants to preschoolers

Programs exclusively serving younger children should have the option of two group-types: 0-2 years and 2-4 years. The 0-2 year age group would have a maximum of 12 children with 3 staff; 2 with RECE qualifications. When 3 children are younger than 12 months old, an additional staff would be required. The 2-4 year old group would have a maximum of 24 children, with 3 staff; 2 with RECE qualifications. When 3 children are younger than 30 months, an additional staff would be required.

Programs serving four- and-five-year-olds

In programs where children do not attend school board-operated kindergarten, 3 educators, including 2 RECEs are required for group sizes of 24. This is in line with standards in full day kindergarten.

Proposed age groupings, staffing and group size 0-5 years		
Child Age	Staff: child ratio	Max group size
0-24 months	1:4 - increased by one staff for every 3 children < 12 months	12
2 – 4 years	1:8 - increased by one staff for every 4 children < 2.5 years	24
Kindergarten age	1:8	24

The ministry is urged to pause to allow for new models to be tested and evaluated. Colleges and municipal programs should be enlisted as change leaders. Engage the support of change management teams to support the transition. This process would be in line with the support provided school boards during the rollout of full day kindergarten.

Tiered Licensing

There is value in a tiered approach to licensing to allow the ministry to allocate resources more flexibly and to focus on programs in need of additional supports. However as proposed, particularly with respect to Tier 2, licensing infractions may go undetected for substantial periods.

Recommendation: Annual licensing of the programs continue with a focus on areas known to promote quality.

Tier 1: Programs with clear licenses – receive a pedagogical review only.

Tier 2: Programs with minor infractions – receive a pedagogical review plus a review of areas where infractions have been cited.

Tier 3: Programs with major or consistent infractions – a full licensing review.

Thank you, for the opportunity to share our views. For more information please contact:

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