ONTARIO COALITION FOR Better Child Care

Association of Early Childhood Educators Ontario

ONTARIO'S CHILD CARE REGULATION PROPOSALS

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THE ISSUE IN A NUTSHELL

- As part of a 5-year review of the *Child Care and Early Years Act,* the Ontario government is proposing regulatory changes that could place some younger children into larger groups with fewer qualified staff.

AGE RANGES, RATIOS AND GROUP SIZES

- The Ontario government is proposing adding an alternative set of age ranges, staff to child ratios and group sizes, called "Schedule 2". Child care operators could apply to the Ministry of Education to operate with Schedule 2 age ranges, ratios and group sizes instead of current requirements. No criteria for application have been provided in the posting.
- Under Schedule 2 Infant and Toddler age groups could be combined. This means children from birth to two would be in the same group, with an increased maximum group size of 12 (up from 9 for infants). The Preschool Age Category would include children from 24 months – 5 years old. Currently children younger than 30 months are classified as toddlers. For children from 24 to 30 months this would raise their staff to child ratio from 1:5 to 1:8 and their group size from 15 to 24 children.
- The following table from the Child Care Resource and Research Unit compares the proposed Schedule 2, current regulations, previous government proposals, and finally, best practice recommendations from US Health and Human Services and the Canadian Pediatric Society for three sample children.

	11 month old – now infant, proposed infant/toddler		**13 month old – now infant, proposed infant/toddler**		**24 month old – now toddler, proposed preschooler**	
	Staff to child ratio	**Group size**	**Staff to child ratio**	**Group size**	**Staff to child ratio**	**Group size**
Proposed 2020 (Schedule 2)	1:3 or 1:4	12	1:4	12	1:8	24
Current regulations	1:3	10	1:3	10	1:5	15
Proposed 2016	1:3	9	1:4	12	1:8	24
Proposed 2014	1:3	10	1:5	15	1:8	24
Proposed 2010	1:3	10	1:5	15	1:8	16
US Health and Human Services Recommendation	*1:3*	*6*	*1:3*	*6*	*1:4 or 1:5*	*8 or 10*
Can Pediatric Society 2011 position statement	*1:3*	*6*	*1:4*	*8*	*1:4 or 1:5*	*8 or 10*

Source: Child Care Resource and Research Unit.

QUALIFICATIONS

- The government is redefining "qualified employee" for kindergarten age group, junior school age group or primary/junior school age group. Under the redefinition individuals with child and youth care, recreation and leisure, or teacher qualifications would be added to the list of qualified employees for these age groups, in addition to RECEs. But since only one staff would require qualifications, these programs could run without an RECE.
- The current posting would allow unqualified short-term supply staff to fill the positions of qualified staff who may be away due to illness or vacation for up to two weeks. Given that only one staff per group is required to be qualified, if that position was filled by an unqualified short-term supply staff, the group could be without any qualified educators.
- The government is proposing to remove a requirement that supervisors of licensed child care centres have at least two years of experience in licensed child care and instead would allow them to two years of experience in any type of children's programming.
- The government's rationale for weakening qualification requirements is to "support workforce retention". However, the current provincial government chose to abandon a provincial early years and child care workforce strategy and pay scale, developed by the previous provincial government, which was the culmination of years of study and consultation with the sector.

UNLICENSED CHILD CARE REGISTRY

- The government is consulting on the idea of an unlicensed child care registry – a government sponsored website that would advertise unlicensed home child care providers. Unlike a licensed home child care, a registry would not provide oversight or regulation of these home child care providers.
- Research shows that many parents misreport that their home child care arrangement is licensed when it is in fact unlicensed, suggesting that adding another category of "Registered" home child care could add to parent confusion. A registry could provide a false sense of security to parents, who may assume that there is government oversight of their child care arrangement when there is not.
- A similar proposal was put forward 2010 and subsequently abandoned in following widespread public opposition.

BEFORE- AND AFTER-SCHOOL PROGRAMS

- When the *Child Care and Early Years* Act was introduced there was a cap of three hours per day placed on recreation programs to avoid a 2-tier system of before- and after-school programs. The current proposal would remove the cap for selected Authorized Recreation and Skill Building Programs.
- Recreation programs are not required to operate under the same, stringent, licensing criteria as child care programs and have different qualification requirements for staff.

WHAT WE NEED

- The provincial government must set aside the current regulatory proposals that threaten the quality of child care for young children. Affordability is not a trade-off for safety. Workforce retention cannot come at the price of trained staff. Placing more younger children into larger groups with fewer qualified staff is not the way to build a quality child care system.
- Rather than watering down regulations, the provincial government should focus their immediate efforts on funding to stabilize the child care sector that is struggling to survive during the pandemic. They should follow through on a workforce strategy with decent work and wages at its core.
- The provincial government must also commit to working collaboratively with the federal government on bringing in a universal, publicly funded child care system.