

# CCEYA regulation policy briefs <sup>[1]</sup>

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## AVAILABILITY

Access full policy briefs [PDF] <sup>[2]</sup>

## EXCERPTS

The OCBCC and AECEO are releasing four policy briefs that 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).

**Brief #1** responds to the proposed Schedule 2, which would introduce a new, optional age grouping model.

## Child Care and Early Years Act Policy Brief #1 Age Groupings, Ratios, Group Size, and Proportion of Qualified Staff

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 the proposed Schedule 2, which would introduce a new, optional age grouping model.

### Community Survey Results

In a community survey of 2,400 RECEs, child care operators, and families, more than three-quarters of respondents opposed all Schedule 2 changes:

- 90% of respondents were opposed to combining Infant and Toddler age groups,
- 87% opposed proposed changes to Preschool age groups,
- 77% opposed proposed changes to Kindergarten age groups, and
- 81% opposed the proposed changes to School Age groups.

### Individual Consultation Responses

The AECEO and OCBCC received 69 individual responses, all of which specifically opposed Schedule 2.

### Organizational Consultation Responses

*"The College recommends that the Ministry reconsider the proposed Schedule 2, especially the combining of infants and toddlers into the same group."* - College of Early Childhood Educators.

*"The proposed changes to age ranges, group sizes, staff to child ratios, and qualifications could risk the quality, health, and safety of child care, and place undue pressure on an already strained early years workforce."* - City of Toronto, Children's Services.

*"Inuuqatigiit Centre and Tungusuvvingat Inuit do not support the proposed changes that are Schedule 2, as increasing group sizes and the child-to-staff ratio will decrease the quality of service within Inuit Early Years services. The needs of children are increasing, requiring the implementation of additional supports and investment in resources to ensure the well-being of children is prioritized."* - Inuuqatigiit Centre and Tungusuvvingat Inuit.

*"Schedule 2 will negatively impact the quality of early care and education; children's emotional and physical safety and well-being; and the well-being of staff."* - Owl Child Care Services of Ontario.

*"The proposal to leave the decision as to which ratio and group size framework to operate under to individual licensees is akin to creating two different maximum speed limits on highways and leaving it up to drivers to decide which one to follow."* - Elementary Teachers' Federation of Ontario.

### Summary of Evidence /Research

Schedule 2 age groupings and ratios are contradictory to a comprehensive body of research which demonstrate that smaller group sizes and enhanced ratios lead to higher quality child care programs. As the [Childcare Resource and Research Unit](#) summarizes:

"Overall, the research finds that fewer children per adult (better or higher, ratios) are associated with: higher global quality scores; more interaction between staff and children, more responsive caregiving; and better academic, cognitive, and social outcomes and better behavioural outcomes such as more cooperative behaviour. Ratios also have a direct impact on staff—on working conditions and key human resource factors such as staff morale, recruitment, retention and turnover, which all, in turn, influence quality as experienced by children."

### Recommendation

There is a wide community consensus and clear evidence against the proposed changes in Schedule 2. We urge the Ministry of Education to listen to community voices and reflect on the research. We recommend that the Ministry of Education does not proceed with the implementation of Schedule 2.



Policy Brief #1 <sup>[3]</sup>: Age Groupings, Ratios, Group Size and Proportion of Qualified Staff

**Brief #2** responds to proposed changes to qualifications, including the re-definition of "qualified employee", the use of unqualified short-

## Child Care and Early Years Act Policy Brief # 2 Qualifications

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 proposed changes to qualifications, including the re-definition of "qualified employee", the use of unqualified short-term supply staff, and removing a requirement for child care supervisors to have experience in licensed child care.

### Community Survey Results

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

- 62% opposed redefining "qualified employees", only 23% supported the proposal with 14% unsure,
- 68% opposed allowing unqualified short-term supply staff to replace qualified staff, 20% supported the proposal and 13% were unsure,
- 65% opposed changes to supervisor qualifications, and 24% supported the proposal and 11% were unsure.

### Individual Consultation Responses

The AECEO and OCBCC received 57 individual submissions that specifically opposed changes to staff qualifications.

### Organizational Consultation Responses

*"Support and grow the number of ECEs in Ontario to meet the need. We do not support watering down qualifications as proposed. Reinstate the Early Years and Child Care Workforce Strategy."* - Compass Early Learning and Care, Peterborough.

*"The proposals with respect to the staffing and qualifications of the ELCC sector workforce are in direct opposition to the recommendations the College made in its last submission and put the safety, health and well-being of children at risk."* - College of Early Childhood Educators.

*"We have reviewed the research regarding...important structural features of ELCC programs, especially staff education in post-secondary ECE programs, that back our firm opposition to these changes."* - Childcare Resource and Research Unit.

*"Removing qualified staff who understand social and emotional child development is detrimental to the quality of childcare in Ontario."* - Ontario Federation of Labour

*"The strong opposition from parents and the implications for the reputation of the RECE designation suggest this [supply staff] proposal should not be pursued."* - City of Toronto Children's Services.

### Summary of Evidence /Research

Education and training specific to early childhood education is an important determinant in quality programs for young children. In Ontario Registered Early Childhood Educator is a protected professional title; they are accountable for meeting specific standards in order to practice the profession. While the government's proposals purport to address the issue of recruitment and retention in the child care sector, research, including a [Ministry of Education sponsored study](#), indicates the best way to improve recruitment and retention is to ensure decent work and professional pay - not to deskill the profession.

### Recommendation

The AECEO and OCBCC urge the Ministry of Education to abandon the proposed changes to staff qualifications, short-term supply staff, and supervisor qualifications and instead, immediately implement investments to support Early Childhood Educators and early years staff.



Policy Brief #2<sup>[4]</sup>: Qualifications

Brief #3 responds to the proposal to create of an online registry of unlicensed home child care providers.

# Child Care and Early Years Act Policy Brief #3

## Unlicensed Child Care Registry

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 the proposal to create of an online registry of unlicensed home child care providers.

### Community Survey Results

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

- 60.7% of respondents were either opposed or unsure of the registry, with 39% in support.
- Respondents expressed confusion over what this proposal would look like, including whether it would be a mandatory or voluntary register or whether it would provide oversight.
- Of those in support of the registry that left comments, 40% indicated they thought a registry would ensure accountability to, and oversight by, the Ministry of Education, which the current proposal does not ensure.

### Organizational Consultation Responses

*"[Past proposals for an unlicensed child care registry] have been rejected again and again, based on concerns about legal liability and concerns about blurring the lines between regulated child care, where parents can be assured of public oversight, and unregulated child care, where they cannot be.... Surely in 2020, regulation should be a starting place for quality child care in Ontario, not something we have to fight for."* - Childcare Resource and Research Unit.

*"It is our firm position that such a registry, based solely on the objectives and parameters outlined in the consultation document and discussion questions, represents an unacceptable risk to the health and safety of children....Such a registry would create serious risks by giving parents a false sense of security about the safety of their children and the level of oversight and enforcement of these providers."* - Home Child Care Association of Ontario.

*"Providing parents with a false sense of security that these programs have oversight or are regulated would be a risky proposal. The licensed home environment follows a comprehensive set of requirements, and a public list of unlicensed providers hosted on the Ministry website may appear like an endorsement of the health, safety and quality of those environments."* - City of Toronto, Children's Services.

*"Set standards to require all home child care provided in Ontario be part of the licensed system. Develop a protocol that will bring the unlicensed providers into the licensed system with dignity, mutual respect and accountability rather than establishing an alternate system of registering with no accountability."* - Compass Early Learning and Care, Peterborough.

### Summary of Evidence /Research

There is a wide body of research that shows the importance of licensing/regulation to the quality of home child care environments.[1] Studies also show 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 2019 study of Ontario home child care by Varmusa, Perlman and White found: "more parents report that their children are in licensed home child care than is possible. The lack of accurate parental reporting calls into question a key assumption of current regulatory systems, which is that parents are informed consumers of ECEC services." [2]

### Recommendation

The Ministry of Education should not proceed with developing an unlicensed child care registry. Instead Ontario needs to set standards that require all home child care providers to be regulated, as part of a comprehensive universal child care system.

[1] For a review of the literature on the connection between regulation and quality in home child care, please see: Ferns, C. & Friendly, M. (2015). [Background paper on unregulated child care for the "Home child care: More than a home project"](#) (pp. 14-17).

[2] Varmusa, P., Perlman, M. & White, L. (2019). [Understanding early childhood education and care utilization in Canada: Implications for demand and oversight](#). International Journal of Child Care and Education Policy, 13 (7).



Policy Brief #3 [5]: Unlicensed child care registry

Brief #4 responds to a proposal to allow specified Authorized Recreational and Skill Building Programs to operate for more than three consecutive hours a day.

# 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 OCBCC 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.



Policy Brief #4 <sup>[6]</sup>: Authorized Recreation and Skill Building Programs

Region: Ontario <sup>[7]</sup>

Tags: legislation and regulation <sup>[8]</sup>

policy <sup>[9]</sup>

public opinion <sup>[10]</sup>

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