

# City of Toronto response to proposed regulations under the Child Care and Early Years Act and Education Act <sup>[1]</sup>

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## AVAILABILITY

[Response summary PDF](#) <sup>[2]</sup>

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## Executive Summary

The provincial government and municipalities in Ontario both play significant roles in the licensed child care system. They share the belief that high quality, accessible child care is essential for parents to participate in the workplace; generates positive child outcomes; and is a key tenet of poverty reduction.

To develop this response, Toronto Children's Services and Parks, Forestry & Recreation conducted broad consultation with service providers, parents and others. Consultations were held with District Child Care Advisory Committees, Children's Services staff, and the Toronto Child and Family Network and its committees, including early learning and care, family support, early identification and intervention, Aboriginal, and French-language. A parent survey also collected 9,291 responses, in both English and French, from parents both using and not using licensed child care. In addition, Parks, Forestry & Recreation and its stakeholders have informed the sections in this response related to recreation programs.

The proposed changes in the provincial consultation document continue the important work that the Province has taken to modernize the legislative and regulatory framework governing child care in Ontario. The City of Toronto continues to support the need for modernization and appreciates the opportunity to comment on these proposals. Many of the proposed changes are important and necessary, especially those that provide flexibility for operators, recognize the importance of Registered Early Childhood Educators (RECEs), strengthen the role of the service system manager, and improve access and quality of programming for children and families.

The proposed changes to licensing standards are of concern. If adopted, they could result in increased costs and service loss. The impact on the availability of spaces is a result of changes to age ranges, group sizes, ratios and the additional space requirements for sleeping areas. In Toronto, the anticipated total loss is up to 2,184 infant and toddler spaces – not including any operator decisions to close rooms because they are no longer viable. The proposed changes would increase parent fees by an estimated 20.8 per cent and 39.2 per cent for infants and toddlers respectively. While provisions have been made for a transitional implementation period, this will not mitigate the estimated loss. Parents have strongly expressed their concern with the lack of access to and affordability of the current child care system. These proposed changes will only exacerbate the difficulty of securing a licensed child care space.

The licensed child care system in Toronto consists of 65,000 spaces, of which 40 per cent are available to families who need fee assistance. While the Province cites one-year federal parental leave benefits as a rationale for changes to the infant age groupings, many families can not take advantage of these benefits (for example, students and low-income earners). It is often these families who benefit most from accessible, affordable, high-quality child care. Our joint responsibility is to level the playing field so that all families have the supports they need for employment and healthy child development. The proposed regulatory changes will work against increasing access for those families who need it most.

It is recommended that the Province maintain the current age ranges and ratios and proceed with implementing enhancements such as increasing the number of trained staff and lowering toddler group sizes. The City of Toronto currently only funds the construction of spaces for 10 toddlers. Setting this maximum group size in regulation – while grandparenting existing programs licensed for 15 toddlers – is a more cost effective change than what has been proposed as it does not create additional capital requirements.

The proposals also put at risk many longstanding community-based recreation programs that provide quality, affordable, programs. These programs promote the overall health and wellbeing of children not participating in licensed child care but may no longer be accessible depending on how they are classified under any regulatory changes.

As a sector, the early learning and care and recreation communities must work together to find regulatory solutions that improve quality and access without wholesale changes that have unintended consequences. The City of Toronto will continue to work with the Province as progress is made towards this vision.

**Region:** Ontario <sup>[4]</sup>

**Tags:** quality <sup>[5]</sup>

legislation and regulation <sup>[6]</sup>

infant/toddler <sup>[7]</sup>

age <sup>[8]</sup>

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