

28 February 2014

The Honourable Elizabeth Sandals
Minister of Education
c/o Early Years Division
900 Bay Street, 24th floor Mowat Block
Toronto, ON M7A 1L2



Dear Minister Sandals,

On behalf of the Board of Directors of Canadian Mothercraft Society ("Mothercraft"), we are pleased to offer feedback to you and your Ministry regarding the proposed changes to Regulation 262 of the Day Nurseries Act through the attached submission. We are also taking this opportunity to comment on Bill 143, the Child Care Modernization Act.

Mothercraft applauds the government's efforts to modernize the legislative and regulatory frameworks in which early years and early learning programs operate. As an organization with an 83 year history of providing services and supports to families with young children as well as training to the professionals who work with them, we have a long organizational memory of the various approaches successive generations of researchers, policy makers and practitioners have utilized within the early childhood sectors. Advancements in brain research, child development and an understanding of the social determinants of health, have all contributed to significant policy and program improvements in early learning. Ensuring that the regulatory environment is aligned with those advancements is long overdue.

Mothercraft has always placed great emphasis on ensuring the best outcomes for young children and, in particular, for infants. In fact, the origins of the organization are in the provision of care to vulnerable infants; caring for orphans awaiting adoption and providing hospice to gravely ill babies. Mothercraft's focus on providing high quality, responsive programs for children continues to this day. It is with this history in mind that the Mothercraft Board is writing to you about some components of the proposed regulatory changes that will not improve care and, in fact, may comprise the safety and development of young children.

Mothercraft supports many of the proposed regulatory changes as you will see in the attached submission. However, we have serious concerns about some of the proposed changes to child-staff ratios, particularly for the youngest and most vulnerable age groups.



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Research shows that children benefit from higher staff ratios (i.e. fewer children per adult). Not only do children do better as a result of more responsive caregiving and more adult/child interactions but these ratios affect working environments for staff which also has an impact on children. More adults in the room lead to better working conditions, fewer incidents of injury or sickness, lower staff turnover and less stress.

At Mothercraft, we know this to be true particularly when it comes to the care of infants and the youngest children in the centres. Our licensed child care centres all operate at higher staffing levels than those required by the current Day Nurseries Act. We have chosen this operational model quite deliberately because:

- 1) This reflects what is best for children based on current research
- 2) We are fortunate enough to be able to afford an enhanced staffing model

All of Mothercraft's licensed child care centres are located in communities with a higher than average socio-economic demographic. As a result, most families are able to pay the full fee rates for their children's care and are willing to pay extra for higher staff ratios.

We know our staff are among the best. That's because the working conditions at Mothercraft are among the very best in the field – more ECEs in the room allows these dedicated professionals to carry out the work they are so passionate about more effectively. They benefit from having more hands to do the work, more eyes to observe the children and more support to ensure an enriched and dynamic program. This is not to say that there aren't high quality programs operating within the staffing ratio guidelines of the DNA, but it is certainly more challenging.

The proposed changes to the ratios will lower the required number of adults in the room per child which, when combined with larger overall groups of children, will have a negative impact on the quality of the programs child care staff are able to deliver. Furthermore, the proposed regulation change that requires only one ECE per age group does not advance the government's stated commitment to quality.

Legislation and regulations set the minimum standards for the province. Most early learning programs and services are not in the fortunate position of Mothercraft, able to provide services above and beyond the minimums set by government regulations. **The minimum standards established by the province must protect ALL children, support EVERY child's development and promote QUALITY based on evidence and research.**

Regulations are also the basis upon which the operational components of service delivery are developed and this must be taken into consideration when analyzing the proposed changes as well. The fact is that fee rates are generally established based on the minimum provincial standards of the governing legislation because, as you know, in addition to quality, affordability of child care is a primary concern for all parents. The fact is that subsidized fee rates established by municipalities will be calculated based on minimum provincial standards because they can't

justify paying for higher standards to their taxpayer base. It is imperative that the provincial standards truly reflect the base standards we want for every child in our province, regardless of the socio-economic realities of their family. We urge you to slow down the process of updating the regulations to allow for the time for a comprehensive consultation. The children of Ontario deserve access to high quality programming regardless of where they live or the income of their families.

With respect to Bill 143, we strongly support the proposed legislation and encourage the government to do everything in its power to ensure its passage as soon as possible. It is important that the proposed changes to Regulation 262 do not happen in isolation. The passage of Bill 143 is a critical component of the government's modernization of the early years services.

Thank you for soliciting our input and providing an avenue for us to share our perspectives.

Sincerely and on behalf of the Mothercraft Board of Directors,

A handwritten signature in black ink, appearing to read 'Basia Ujejska'.

Basia Ujejska
President

A handwritten signature in black ink, appearing to read 'Michele Lupa'.

Michele Lupa
Executive Director



Since 1931, Canadian Mothercraft Society (“Mothercraft”) has provided programs and services to families with children aged 0 to 6 years. In addition to offering a wide range of supports such as infant mental health, early intervention and family support, Mothercraft currently operates three licensed child care centres and is an accredited Private Career College delivering education, professional development and training to early learning professionals, including a Diploma in Early Childhood Education. The organization acts as the lead agency for the Data Analysis Coordinators in Toronto Region as well as for the Child and Youth Services Information System. The depth and breadth of services offered by Mothercraft are the result of very deliberate decisions by the organization over many years to deliver a comprehensive continuum of programs to meet the needs of families. These programs and services are aligned with many provincial initiatives in the sector aimed at creating a more seamless and integrated system of supports for families and improved child outcomes. We welcome the opportunity to contribute to the dialogue about how to modernize Ontario’s child care system to ensure every child is able to thrive and flourish.

Following the release of the Ministry of Education’s Discussion Paper in December 2013, Mothercraft participated in various collaborative responses to the document (City of Toronto Children’s Services, Quality Early Learning Network, Home Child Care Association of Ontario) and supports the submissions made by these organizations. Mothercraft is pleased to offer additional feedback on the various proposed changes to Regulation 262 to help guide the Ministry through this period of change and transformation.

TRANSFORMING ONTARIO’S CHILD CARE AND EARLY YEARS SYSTEM - A strong legislative and regulatory framework is essential

Mothercraft applauds the government’s efforts to modernize the legislative and regulatory framework in which early learning programs operate in Ontario. The standards set by these frameworks articulate expectations regarding the minimum acceptable criteria in the delivery of early learning programs. The current Day Nurseries Act (DNA) does not meet the needs of a rapidly changing sector. Mothercraft supports Bill 143 (*Child Care Modernization Act 2013*) and encourages the government to move forward with the passage of this much needed legislation as expeditiously as possible.

We understand that the purpose of introducing changes to Regulation 262 of the DNA at the same time as Bill 143 is to ensure that modernization happens regardless of the outcome of the legislative process. However, having both activities occur at the same time may serve to undermine the overall intention of the Ministry, which we know to be the achievement of a high quality, modernized early learning and early years sector for Ontario. The simultaneous, yet separate, processes of legislative and regulatory change presents risks to the sector as

operators, regulators, practitioners and families struggle to understand and provide thoughtful input to all of the proposed changes while also dealing with day-to-day operations and the constantly evolving implications of system changes emanating from the implementation of full day kindergarten. We are mindful of the fact that the child care sector is in the midst of a crisis that requires immediate attention but careful consideration must be given to ensuring that initiating multiple changes processes at once can serve to exacerbate the crisis rather than resolve it.

We note that within the proposed changes to Regulation 262 there is a statement that allows programs to consider working with the existing regulations regarding group size and adult-to-child ratios or with the new ratios and group sizes once approved. This is confusing and does not clearly establish a minimum provincial standard.

We are concerned about the message this sends to operators about the province's expectations and that it may also create inconsistency in the development of new funding formulas and fee subsidy rates by municipalities.

Mothercraft recommends that the government slow down the process of updating the regulations to allow adequate time for a comprehensive consultation on what are, truly, the critical components of any new regulatory framework and to ensure the legislative process is given appropriate attention in the context of the many significant, and much needed, sector changes currently underway.

ENHANCING QUALITY – Quality in early learning is critical

Mothercraft supports the government's vision for an improved early years system and all of the key features of the system as articulated in the Ministry of Education's December 2013 discussion document. Access to high quality early learning and care is critical to our success as a province; not only does quality care contribute to the healthy development of our children, it also creates the conditions for a thriving economy and productive society.

Mothercraft has a long history of focussing attention and inquiry on the issue of quality care for young children. Since its inception, Mothercraft has been committed to furthering knowledge with respect to increasing the standards of care provided to the youngest, and most vulnerable, children. In 1965, the organization opened its first licensed infant child care program and, in 1967, Mothercraft partnered with the Ontario Institute for Studies in Education (OISE) to undertake research to determine the effects of quality child care on "disadvantaged" children. This research helped to establish a model for the delivery of infant child care and is one of the reasons Mothercraft continues to be seen as a leader in the delivery of infant care. The findings of this study also helped to shape the development of ECE curricula.

Mothercraft remains committed to quality early learning for young children. This commitment is embedded in our programs through a theoretical framework that manifests itself in a specific service delivery approach – the primary caregiver model. The efficacy of this model is multi-faceted but one of the fundamental aspects of the model that we know to be a significant contributor to the quality of our early learning programs is our ability to operate with higher adult-to-child ratios than those set out in the provincial standards. In other words, we

have more adults in the room per child than the DNA requires and more of those adults are qualified ECEs. More adults in the room, particularly more trained professionals, is directly connected to better outcomes for children and higher quality programs. (We will provide more specific feedback with respect to the proposed changes to staff-child ratios in the section below, “Increasing Access and Flexibility”.)

Mothercraft fully endorses the Early Learning Framework (ELF) and the proposal to develop a policy statement to guide program content and educator practice. ELF (and its precursor, ELECT) provide an important, evidence-informed framework for all of the professionals who work with children. It also provides us with a shared language and understanding of child development along with a set of principles that help to inform the way the framework is operationalized. Including the principles and approaches of ELF in a policy statement within the regulations will further embed these approaches in practice and offers the added benefit of creating greater flexibility with respect to some of the more outdated operational elements of the existing regulation (ie, requirement for posted daily program plans, requirements for outdoor play and rest periods).

There is a caution that accompanies the endorsement of this proposal. Child-directed, inquiry-based, responsive programming is very much linked to practitioners having the time and resources to engage in this type of holistic approach to program delivery and to engage in greater communication with families. The ever-increasing administrative requirements of licensed early learning environments, which include meeting provincial licensing standards, municipal operating criteria, public health compliance and, in some instances, school board regulations, mean that ECEs are under tremendous pressure to meet a multiplicity of accountabilities that have serious consequences attached to any failure to meet expectations. There must be alignment between the principles articulated in a policy statement and the realities of operating an early learning program.

Mothercraft recommends that the principles of ELF/ELECT and all provincial early learning policy statements be the lens through which existing and new regulatory criteria are considered and implemented. We further recommend that the Ministry consider ways to better integrate the various compliance and regulatory oversight requirements of early learning environments so that they align with provincial policy statements and pedagogical frameworks. Specifically, we recommend that the Ministry consider establishing harmonized approaches with Consolidated Municipal System Managers and/or Public Health Units through the development of:

- ***Consolidated, integrated compliance tools***
- ***Complimentary and/or combined review and inspection processes***
- ***Coordinated inspections and reporting***
- ***Consolidated reports to families on inspection outcomes***

INCREASING ACCESS AND FLEXIBILITY –

With respect to the proposals outlined in the discussion document regarding ratios and group sizes for group centres, Mothercraft **does not** support all of the proposed changes. Below is our specific feedback:

Age Group	Proposed Staff:Child Ratio	Mothercraft response	Proposed Max Group Size	Mothercraft response	Proposed Min # of ECEs	Mothercraft response
0-1 years	1:3	YES	10	YES	1	NO suggest minimum of 2 ECEs
1-2 years	1:5	NO suggest 1:4	15	NO suggest maximum of 12	1	NO suggest minimum of 2 ECEs
2-4 years	1:8	YES	16	YES	1	NO suggest minimum of 2 ECEs
4-5 years	1:13	YES	26	YES	1	NO suggest minimum of 2 ECEs

Notwithstanding the above, Mothercraft strongly supports the recommendations developed by the Quality Early Learning Network(QELN) regarding an alternative structure and approach to age groupings and staff:child ratios. Specifically, that the government consider a more flexible, overlapping of the age groups that would allow early learning programs to place children according to their developmental needs (the points below are taken directly from the QELN submission):

- Infant groups could serve children aged 0-1.5 years, with a maximum group of 10 and 3 employees (a minimum of 2 out of 3 staff are registered ECEs)
- Toddler groups could service children aged 1-2.5 years, with a maximum group of 12 and 3 employees (a minimum of 2 out of 3 staff are registered ECEs)
- Preschool could service children aged 2 to 4 years, with a maximum of 16 and 2 employees (both are required to be registered ECEs)

In principle, Mothercraft supports an approach to centre-based care that includes multi-age groupings. With respect to the two proposed models outlined in the discussion document, we do not support Model 1 as we believe it puts children at risk by significantly reducing existing staff:child ratios. With respect to Model 2, we would support this approach with a proviso that group sizes be based on research regarding the maximum number of children in the group and staff:child ratios that allow for the safest care of the youngest children. The model must also take into account very important operational considerations such as sleep routines, toileting practices, meal times and transitions. This approach is aligned with Mothercraft's primary caregiver model which emphasizes strong attachments with teachers for longer periods of time and increased opportunities for development through exposure and interaction with older children.

Common to all of the above is: 1) a focus on keeping group sizes low, particularly for the youngest children; 2) maintaining higher adult-to-child ratios for the youngest, and most vulnerable, children; and 3) ensuring there are more trained professionals in the room at all times. This approach is consistent with what the research tells us will result in the best development outcomes and highest levels of safety for children.

As was mentioned in the previous section, Mothercraft operates with a higher adult-to-child ratio than those required under the DNA or even those being endorsed above. It is important to note that the reason for this is due to the fact that all of Mothercraft's licensed child care centres are located in communities with higher than average socio-economic demographics. The fact that the majority of families in our centres can afford to pay the full fee rates associated with higher staff ratios significantly contributes to our ability to have a higher number of staff, and specifically a higher number of ECEs, in our programs. Families who cannot afford to pay full fee rates and who require fee subsidies in order to access child care do not necessarily have the same kind of access to these higher standards of care. Certainly Mothercraft can, and does, serve low income families in its child care programs but the subsidized fee rates established by the municipality are further subsidized by our organization. This is a decision that the Mothercraft Board of Directors has deliberately made to support children in our communities but it is not the kind of systemic approach we would like to see across the province. Careful consideration must be given to ensure that transformation initiatives do not further embed these kinds of inequities. Our goal should be to constantly strive to lessen the gap between those who have and those who do not.

We are most concerned that, should the proposed staff:child ratios be enacted, the potential negative impact for children who attend group early learning and care programs as a means of mitigating the impact of living in multi-stressed home environments, will be further compromised. For children who are already exposed to multiple development risk factors as result of their family's psycho-social or socio-economic realities, their development may be further compromised when they are placed in child care centres that adhere to the lowest expectations set out by the provincial regulations, whether by choice or out of necessity. As an agency that works with some of the most marginalized and high risk families in the City of Toronto through our early intervention and children's mental health programs, we cannot stress enough how important licensed early learning programs are for some of these children. We are deeply concerned that the proposed regulations could serve to compromise the development outcomes of children by diminishing the minimum provincial standards, especially for the youngest children.

Finally, we are concerned that the implementation of the proposed regulations may result in unintended consequences and have described some of them below. We encourage the Ministry to be mindful of the possibility of inadvertent negative impacts for Ontario's early learning programs resulting from regulatory changes:

- Lower and/or less effective inclusion of children with extra support needs due to the higher numbers of children and fewer trained staff per child in programs. The individual needs of children with special needs do not seem to have been considered in the proposed ratios
- Higher instances of staff illness, injury, turnover and burnout
- Increased numbers of health and safety incidents for infants and toddlers

As a member of the Home Child Care Association of Ontario, Mothercraft supports and endorses the recommendations developed by the HCCAO and defers to that organization's submission for feedback regarding any proposed regulatory changes related to private home day care.

Mothercraft recommends that the Ministry give very careful consideration to any changes to staff:child ratios and/or group sizes to ensure they enhance quality and ensure safety for all children, in particular, for the youngest and most vulnerable children. Our specific suggestions are detailed above. Any shifts in the regulation must move the early learning sector forward in its efforts to improve quality, child development outcomes and the safety of children. The new regulations should serve to reduce inequities between and among families.

ENHANCING HEALTH AND SAFETY –

With respect to the proposed amendment to Criminal Reference Checks and Vulnerable Sector Screening, Mothercraft fully supports these suggested changes.

With respect to the proposed amendment to First Aid Training, Mothercraft fully supports these suggested changes. Our current practice exceeds these minimum standards.

With respect to the proposed amendment to Nutrition Requirements, Mothercraft fully supports these suggested changes. We do note that there are cost implications associated with the requirement to have menus reviewed by a registered dietician and there may be implications associated with increased minimum standards requiring adherence to Canada's Food Guide. We recommend that the Ministry encourage Consolidated Municipal System Managers to factor these changes, and their costs, into their funding formulas for early learning programs.

Thank you for the opportunity to share our experience and perspectives.