

SUBMISSION FROM MARTHA FRIENDLY

Re: Item CD 11.4 City of Toronto’s Response to Proposed Regulations under the Child Care and Early Years Act, 2014 and the Education Act

I’m Martha Friendly, executive Director of the Childcare Resource and Research Unit—with a mandate is to research to further ECEC in Canada through research. As part of that, CRRU has produced a response to the province’s proposed regulation changes and a summary of research relevant to the regulation changes.

My remarks today are based on these.

First about access and quality:

I’m particularly appreciative of the City’s analysis showing that the proposed changes would diminish “access”—as the provincial government assertion that they would improve doesn’t seem to be based on a concrete robust analysis.

Community service providers agree that the proposed changes would mean loss of spaces and higher parent fees.

About quality: (summary of the research from our BRIEFing NOTE):

- High quality is what makes child care “educational” (in the broad sense) rather than “institutional” or negative.
- **Both** ratios and group sizes are key in quality, especially for younger age groups.
- ECE training at PSE level is also key. **But** while the proposed increase in ECE training is most welcome, it cannot be seen as a trade-off for poor ratios and group sizes.
- Ratios and group sizes have an impact **on staff**—on working conditions, morale, recruitment, retention and turnover— which influence quality as experienced by children.
- The ratio and group sizes proposed would make Ontario **one of the worst among** provinces on these characteristics.
- The proposed regulations considerably **exceed** expert-recommended ratios and group sizes

CRRU (and others) spoke out against ratio and group size cuts much like these in 2010 and in 2014—until they were withdrawn by the provincial government.

And although there have been some “tweaks” in the 2016 version, these are insufficient to contribute to high quality.

On the home child care caseloads – research shows that home visitor support for providers is a main predictor of quality, while it’s also important to note that agency home visits are the mechanism by which home child care is monitored for compliance with Ontario’s regulations.

Thus, removing the caseload would significantly reduce public oversight of regulated home child care.

.....
I also want to raise concerns about the policy development and consultation processes that produced these proposed changes.

I’m quite disappointed that rather than building the high quality ECEC system that would make Ontario a leader in Canada— the community has had to expend its already limited resources to defending basic quality and access, while child care is in considerably worse shape than it was when the move to “full-day early learning” began.

We would have hoped that by 2016, the conversation would have been different.

So - I urge you to support the report’s recommendation to abandon the proposed changes to these licensing standards.

However, I would go further. In my opinion, the whole approach to what has been termed “modernizing” child care needs to take a fundamentally different approach than it yet has.

That is—I would argue that the child care situation is way beyond “tweaking”— that it has too many weak points to be “tweakable”.

For some years we have urged the Ontario government to undertake a different approach, as a paper I wrote for the City of Toronto in 2011 outlined. It said that:

A policy framework should include:

- a predictable multi year approach to planning and funding **by all levels of govt,**
- clear goals and objectives, roles and responsibilities;
- identified targets and timetables;
- sustained financial commitments;
- collaboration with stakeholders including municipalities and the ECEC community; transparency and public accountability measures;
- quality goals and assurance;
- data collection, analysis and ongoing evaluation to improve policy and programs.

CRRU's response to Bill 10 again urged the provincial government to implement a full policy process with the aim of developing a robust, comprehensive "modernized" policy framework with rationales, principles, short and long-term plans, funding and evaluation mechanisms.

This has not happened, however.

Instead what we have is a disconnected array of perplexing policy, funding, program and pedagogical changes that too often contradict the government's stated directions while key elements— goals, targets and timetables, funding and implementation plans—needed to provide the "glue" for a coherent ECEC policy are still missing in 2016.

So to conclude: two points:

I'm speaking in support of the City's recommendation that the province abandon its changes to ratios and group size and to home child care caseloads.

Second, I am urging the City of Toronto to call on the Ontario government to undertake a comprehensive evidence-based policy development process with the explicit aim of developing a full plan for a high quality, integrated, equitable, universal early childhood education and care system across the province.