

EC17.12 Attachment 1

City of Toronto Draft Response to Proposed Regulations under the *Child Care and Early Years Act,* 2014

**City of Toronto
Children's Services
Parks, Forestry, and Recreation
October 2020**

Executive summary

This report presents the City of Toronto's draft response to proposed regulatory amendments under the *Child Care and Early Years Act, 2014* (CCEYA), pending City Council approval. It outlines results from community engagement, provides information on potential impacts of proposed changes, and summarizes the City of Toronto's recommendations.

Toronto envisions an accessible, affordable, high quality child care system with a thriving workforce. This vision depends on three core pillars outlined in Toronto's Licensed Child Care Growth Strategy: (1) build capacity in the system to meet demand and provide high quality, licensed child care; (2) improve affordability for families by reducing parent fees and increasing the number of fee subsidies for families in financial need; and (3) support a thriving workforce through high quality jobs that attract and retain skilled child care professionals.

To inform the City's position on proposed regulatory amendments, Toronto Children's Services undertook a consultation process including: parent and service provider engagement through an online survey (distributed in English and French), and virtual sector stakeholder consultation sessions with early years and recreation partners. Data from these consultations was analyzed to determine parent and service provider positions on the proposals as well as potential impacts on access, affordability, equity, quality, health & safety, and the early years workforce.

Legislative and regulatory changes present an important opportunity to advance equity in the early years. Child care and early years programs redress the impact of inequities, and are a critical factor in poverty reduction and workforce participation, and in enabling children's healthy development. These benefits to child and family outcomes are greatest for communities facing high inequities. Addressing disparities in the child care and early years sector requires an understanding of key barriers to equitable access, as well as the distinct needs of diverse equity-seeking groups. Part of taking an equity-based approach to policy and planning is analyzing the *potential* impact of proposed changes on disparities in child and family outcomes and equity-seeking populations. This response considers these potential impacts on families, service providers, and the workforce, throughout. Overall, the proposed regulatory changes do not adequately respond to the inequitable distribution of resources and opportunities among families in our city, or signal a commitment to driving equitable outcomes.

Through stakeholder consultations, the City has heard serious concerns with some of the proposed changes. In particular, 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.

The City of Toronto, the Province, and Toronto's early learning and child care partners must collaborate to reach regulatory solutions that advance affordability and access, while supporting equity, quality, and a thriving workforce. The City of Toronto looks forward to continued collaboration as we make progress towards these goals.

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Introduction

This report presents the City of Toronto's response to proposed regulatory changes under the *Child Care and Early Years Act, 2014* (CCEYA) posted for consultation on October 2, 2020, as part of the mandated 5-year review of the Act. As with previous submissions on regulatory changes, this report reflects consultation with families, early years and child care service providers, and other stakeholders. The City of Toronto welcomes the opportunity to provide comments to the Ministry of Education on their proposed regulatory amendments. In general and taken as a whole, the City has heard concerns with the proposals, expressed through community and stakeholder consultations, which are described throughout this report.

The regulatory amendments are meant to support the province's four goals: increasing flexibility and choice, improving affordability, reducing administrative burden, and enhancing quality. However the City has concerns that the cumulative impact and timing of the changes do not address the needs of children, families, and service providers who are under significant pressure due to the impacts of the COVID-19 pandemic. In addition, long-standing structural issues in the child care system, particularly related to the workforce, remain unaddressed by the proposals and the 5-year review. These changes appear to be premature as the future status of the child care and early learning system post-COVID-19 is unknown.

Parents and service providers were engaged through an online survey, distributed in English and French. The parent survey generated a total of 1,588 completed responses in English and 4 in French, while the service provider survey generated 722 complete English language responses and 4 French responses. The vast majority of service provider respondents (90%) identified as delivering licensed centre-based childcare. The survey response rate from service providers in particular is substantial and the City thanks providers for taking the time to contribute to this consultation process.

Virtual sector stakeholder consultation sessions were conducted including: all four Toronto school boards, the Home Child Care Association of Toronto, agencies delivering Every Child Belongs (ECB) resourcing (i.e. supports for children with extra support needs), the Boys & Girls Clubs – Ontario, the Aboriginal Advisory and Planning Committee, and the Quality Early Learning Network. Toronto Children's Services also considered results of consultation on similar regulatory proposals in 2014 and 2016, and service planning consultations carried out in 2019 and early 2020.

It is important to recognize limitations in this consultation process. Service providers in Toronto have been significantly impacted by the COVID-19 pandemic, leaving limited time for thorough engagement on regulatory proposals. In addition, given time and resource constraints, Toronto Children's Services was not able to conduct significant focussed consultation particularly with Black-led and Black-serving organizations, and with communities facing greater inequities. The disproportionate impacts of the COVID-19 pandemic have demonstrated once again the importance of respectful engagement with diverse communities in Toronto to ensure program and policy changes are responsive to their unique needs, strengths, and experiences. The Division has leveraged existing relationships with organizations, data and research, to assess the

possible equity impacts of the proposed changes, and gathered advice through consultation with Social Development, Finance, and Administration.

The City did not respond to every proposed change and has focussed comments on those proposals that would have significant impacts in the Toronto context. This report considers possible impacts of the proposals in broad areas of access, affordability, equity, quality, health and safety, and early years and childcare workforce. Throughout, the City has offered recommendations to the Ministry of Education in response to the proposed changes.

Proposed Regulatory Changes and Response

Through the 5-year review of the CCEYA the province has identified six key areas of action to further improve the child care and early years system. The proposed regulatory amendments are intended to support progress in these six key areas:

- support quality in child care and early years settings
- create flexible options for families and providers
- update staffing qualifications to support workforce retention
- clarify requirements for inclusion of children with special needs
- support Indigenous-led and culturally relevant programming
- reduce administrative burden and address technical issues and gaps

These actions are intended to support the government's longer-term commitments to continue to enhance the system by providing more choice and affordability for children and families, reducing red tape and administrative burden, and improving quality.

As part of the consultations on the 5-year review, Toronto Children's Services submitted recommendations to the Ministry on July 30, 2020. While not all suggestions could be addressed through regulation, the City notes the absence of response to those proposals.

A. Flexibility and Responsiveness

Proposal A1: Schedule 2 – Requirements for Age Groupings, Ratios, Maximum Group Size, and Proportion of Qualified Staff

What is being proposed?

To address the varied needs of families and communities in Ontario and support successful business models, the ministry is proposing to add Schedule 2 to O.Reg. 137/15. This would be an optional approach where child care centre licensees could apply to the ministry to operate a program in accordance with the age groupings, ratios, maximum group sizes and proportion of qualified staff set out under Schedule 1 (currently in place) or under the proposed Schedule 2. Should it be approved, this proposal would have no impact on the family age groups set out in Schedule 4 in O.Reg. 137/15.

Details of the proposed changes to age ranges, ratios of staff to children, maximum number of children per group, and minimum number of qualified staff are summarized in the Tables below.

The City of Toronto gathered substantial feedback on this proposal. The province has previously proposed similar changes in 2016 and in 2014. A notable difference in this case is that the current proposal allows licensees to choose between two sets of standards, whereas in prior proposals only one set of standards would apply across the sector. In both 2016 and 2014, proposals were not implemented following significant concerns raised from stakeholders regarding possible impacts to affordability, access, and quality. The sections below explore potential impacts and results of consultation on the current proposed change. See Appendix A and below for Tables 1 and 2 below outlining current requirements and proposed requirements.

Service and Affordability Impacts

The proposed regulatory changes will impact the cost to operate centre-based child care and, as a result, affordability for families. On average, approximately 80-85% of the cost of child care is comprised of salaries and benefits for staff, which is primarily driven by ratio and qualification requirements. Child care centres manage costs by utilizing their available space as efficiently as possible. Children's Services has analyzed the proposed changes with a focus on the most significant impacts, including: staff-to-child ratios, maximum group sizes, and changes to staff qualification requirements.

Given that the proposed changes are optional, the overall financial and capacity impacts will be based on the rate of adoption by operators. Impacts to individual child care centres will vary significantly and be dependent on multiple factors, including physical room constraints and the qualifications of its existing staff complement. Similarly, affordability impacts for families will depend on their individual experience, including the age at which a child begins receiving service as well as the length of time a child is in care at a particular centre. A comparison of Schedule 1 and Schedule 2 is provided in the Table 1 below, organized by age range of children. The potential impacts of the new schedule when compared to the current schedule are provided in Table 2.

Table 1 Comparison of requirements under Schedule 1 (left) and proposed Schedule 2 (right)

| Age Range of Child (months and years) | Age Group (S1) | Staff to Child Ratio (S1) | Max. Group Size (S1) | Age Group (S2) | Staff to Child Ratio (S2) | Max. Group Size (S2) |
|---------------------------------------|----------------------------------|---------------------------|----------------------|----------------------------------|---------------------------|----------------------|
| 0 to 12 m | Infant | 3 to 10 | 10 | Infant/Toddler | 1 to 3 | 12 ¹ |
| 12 to 18 m | Infant | 3 to 10 | 10 | Infant/Toddler | 1 to 4 | 12 |
| 18 to 24 m | Toddler | 1 to 5 | 15 | Infant/Toddler | 1 to 4 | 12 |
| 24 to 30 m | Toddler | 1 to 5 | 15 | Preschool | 1 to 8 | 24 |
| 30 m to 5 y | Preschool | 1 to 8 | 24 | Preschool | 1 to 8 | 24 |
| 5 to 6 y | Preschool | 1 to 8 | 24 | Kindergarten | 1 to 13 | 26 |
| 44 m to 7 y | Kindergarten | 1 to 13 | 26 | Kindergarten | 1 to 13 | 26 |
| 68 m to 13 y | Primary/ Junior School Age | 1 to 15 | 30 | Primary/ Junior School Age | 1 to 20 | 20 |
| 9 to 13 y | Junior School Age | 1 to 20 | 20 | Junior School Age | 1 to 20 | 20 |

¹ Impacts to group sizes assume that the current physical space can accommodate larger group sizes while still meeting regulatory space requirements. Most purpose-built infant rooms in Toronto would not be able to accommodate more than 10 children, and under Schedule 2 would likely operate with a maximum of 9 children as opposed to the group size of 12 proposed.

Table 2: Summary of potential impacts of proposed Schedule 2 compared to current Schedule 1

| Age Range of Child (months and years) | Group Sizes | Number of Staff per Room | Proportion of Qualified Staff per Room | Affordability for Families |
|---------------------------------------|-------------|--------------------------|--|----------------------------|
| 0 to 12 m | Larger | More | Higher | Less |
| 12 to 18 m | Larger | No Change | Higher | Greater |
| 18 to 24 m | Smaller | No Change | Higher | Less |
| 24 to 30 m | Larger | No Change | Higher | Greater |
| 30 m to 5 y | No Change | No Change | No Change | No Change |
| 5 to 6 y | Larger | Fewer | Lower | Greater |
| 44 m to 7 y | No Change | No Change | No Change | No Change |
| 68 m to 13 y | Larger | Fewer | No Change | Greater |
| 9 to 13 y | No Change | No Change | No Change | No Change |

In general, smaller group sizes and a higher proportion of qualified staff result in the cost of care being less affordable for families. Smaller group sizes result in higher parent fees as operating costs would be spread over fewer families. In addition, more qualified staff would increase operating costs as the average compensation for a Registered Early Childhood Educator (RECE) is approximately 25% higher than a non-registered member of staff.

Conversely, larger group sizes and a lower proportion of qualified staff result in the cost of care being more affordable for families. Other proposed changes also relax the qualification requirements for supervisors, staff in kindergarten and school-aged rooms, and for staff providing temporary backfill coverage for periods of up to 2 consecutive weeks. In general, the quality of programming is closely tied to the qualifications of staff and group sizes (OECD, 2012).

Over the last four years the City of Toronto has made significant improvements in affordability for families in partnership with the federal and provincial governments, and through the Toronto Licensed Child Care Growth Strategy. The Growth Strategy is founded on three main pillars:

1. Build capacity in the system to meet demand and provide high quality, licensed child care;
2. Improve affordability for families by reducing parent fees and increasing the number of fee subsidies; and
3. Support a thriving workforce through high quality jobs that attract and retain the best child care professionals

The degree of potential affordability improvements cannot be reasonably estimated until further operational guidelines, capital requirements, and actual uptake across the sector are known. While it is possible affordability may be improved for some families, savings would generally be built upon larger group sizes, fewer in-room staff, and relaxed staff qualification requirements. The broader mix of ages, and subsequently greater span of developmental stages proposed in Schedule 2 groupings, is not aligned with current

pedagogical best practice. These changes would have a negative impact on program quality, and do not align with the overall objectives of the Growth Strategy.

With respect to operator viability, there is some risk that combining infant and toddler age groups in the manner proposed in Schedule 2 could contribute to a reduction of infant spaces. The staffing and revenue implications of this model could make it more desirable to operate such a room for toddlers. While this impact cannot be quantified, there is some risk to infant space availability for families in a scenario where Schedule 2 is widely adopted.

Furthermore, the City of Toronto and the Government of Ontario have made significant capital investments to build centres with rooms to accommodate group sizes under Schedule 1 which requires distinct groupings of infants and toddlers. Many programs will not possess the square footage in their infant rooms to accommodate 12 children, as infant rooms are generally built for 10 children. To retrofit existing and under construction space to new standards to fit 12 children would require additional investment. These physical restrictions may limit operator interest in Schedule 2, and, should operators select Schedule 2, may not result in an increase in spaces as rooms would not have capacity for 12 children.

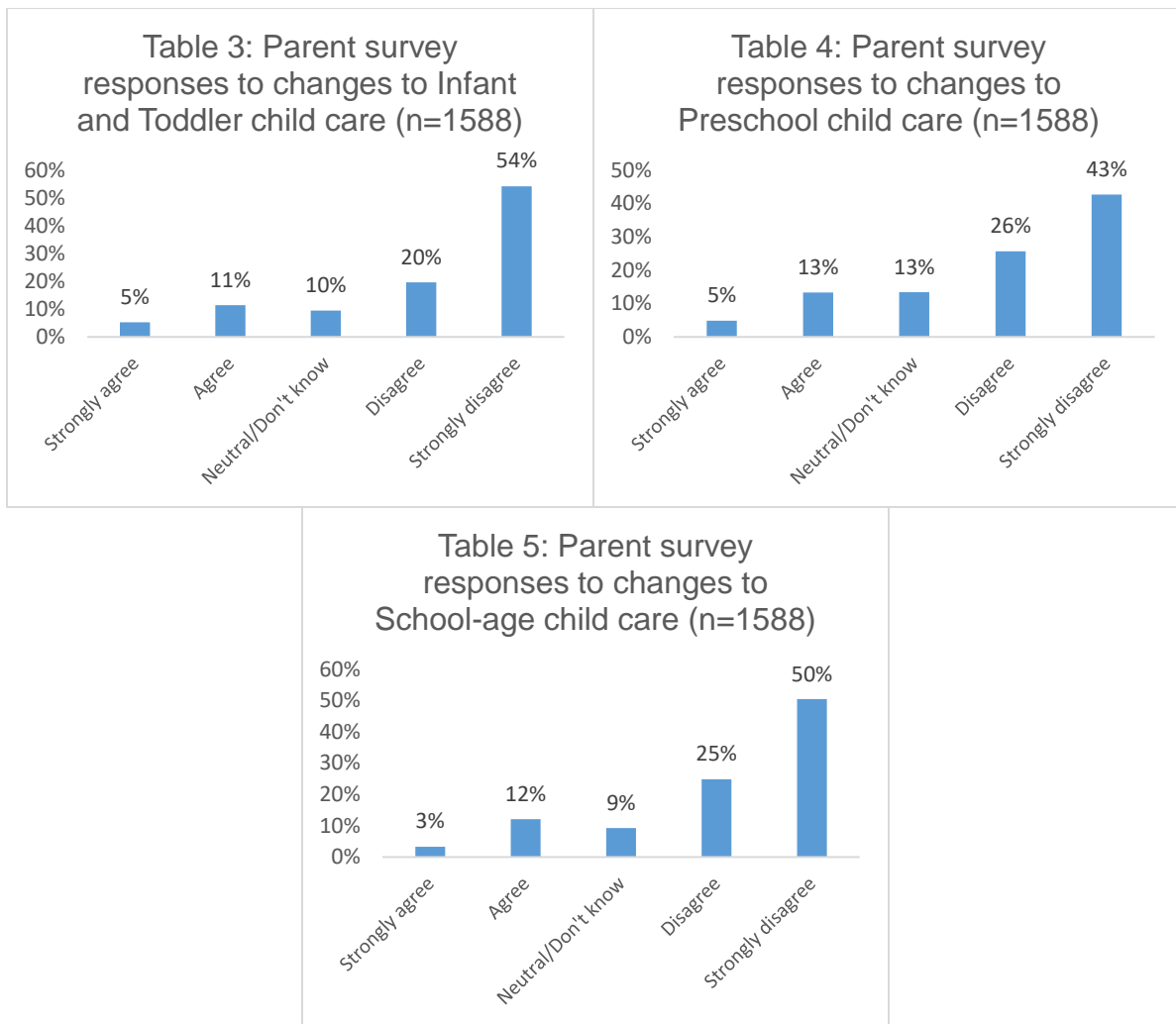
Consultation Findings

Consultations on this proposed change revealed significant concerns and opposition. The majority (71%) of service provider respondents did not agree with the proposed Schedule 2. As well, 65% of service providers said they were unlikely to uptake Schedule 2, and this did not vary significantly by program auspice (not-for-profit, commercial, and City-run centres). These sentiments were echoed by parents and families, with 80% of parent and family respondents not in favour of allowing child care operators to choose between the two sets of licensing standards.

Providers who said they would move to Schedule 2 said that it would increase their enrollment numbers, allow for younger children to enter child care, and provide more flexibility in programming and staffing. However some of these providers said that moving to Schedule 2 would be problematic due to physical space restrictions, and may require them to eliminate some of their offerings in order to adjust to the new group sizes.

Many of the larger child care agencies were in favour of the flexibility that Schedule 2 provides but would like the ability to mix delivery options across both schedules. The province is recommending only one schedule be applied per licence.

When asked about specific proposed changes in Schedule 2, parent survey respondents' level of disagreement ranged from 69% to 75% (see Tables 3-5). Respondents' major concerns with the proposed Schedule 2 were impacts on quality and safety.



Consultation results are explored further below.

Equity

As explored above, there is some risk to infant spaces should a substantial number of operators elect to operate Schedule 2. It is noted that while maternity benefit changes may have reduced demand for infant care for some families, there remain many families who still require care for young infants, including lone-parent families and those without access to extended maternity and parental leave, including students, those who cannot afford to take a reduction in wages for an extended time, very low-income families, newcomer families, and those who do not meet eligibility (Robson, 2017). These families would require an infant space for children on the younger end of the infant/toddler grouping and may face difficulties securing this space under the proposed Schedule 2.

Quality, Health and Safety

From the perspective of pedagogy and healthy child development, combining infant and toddler (0-24 months) age groups raised concerns with respect to quality. Parent and

provider respondents considered this inappropriate due to developmental differences (in terms of sleeping, feeding, play, and diapering) and that it would result in children having unmet needs. Providers additionally said that it would be difficult for staff to plan programming based on the very large range of needs in the group. Mixing of infants and toddlers is more complicated when children have extra support needs that require consistency, familiarity, and smaller groups to form attachments.

In 2012-13 Children's Services with the Ontario Institute for Studies in Education (OSIE) explored the possible impact of combining infants and toddlers using Assessment for Quality Improvement (AQI) data. The results showed significant differences in child development between infants and toddlers. In order to ensure high quality and positive outcomes for children in their formative years, combining these age groups was not recommended.

The proposed preschool program age grouping (24 months-5 years) is also a wide developmental range for children who are at very different stages in terms of language, literacy, toileting, and mobility, which could make designing an inclusive and developmentally appropriate program that meets the needs of all enrolled children difficult. Both parents and providers cited these concerns in their responses, and providers also felt that the 1:8 staff to child ratio was inadequate to meet the needs of all children in the program. They felt program quality would be negatively impacted as well as health and safety.

Parents and families had serious concerns with the proposed 1 staff to 20 child ratio for children age 6 to 12. Feedback raised issues with emergency response, effective supervision, and safety during physical activity with such a ratio. The ability of one staff to work alone with a large group and still deliver on expectations around physical activity, nutrition, and support ongoing learning beyond the school day (e.g. homework help) would be limited. In addition, school age programs in Toronto continue to see increases in children with extra support needs, whose inclusion may be compromised in a group of 20 with only one educator. Finally, the wide range of developmental needs of children in the 6 to 12 age range makes the design of age appropriate programs critical to maintaining children's engagement, a task that would be difficult at this ratio.

Workforce

In general, the proposed changes in Schedule 2 would put additional strain on child care staff to deliver engaging programming and ensure a high quality environment, an impact that parents also emphasized. The proposed preschool age range at a ratio of 1 staff to 8 children was highlighted as posing a significant challenge for staff, especially in programs where there are a significant number of younger preschoolers. Staff would face significantly more stress in ensuring an inclusive environment for children with extra support needs in the proposed Schedule 2.

The recruitment and retention crisis in child care is pronounced for school age programs, which tend to offer lower pay and poorer working conditions (such as split shifts). Service providers indicated that requiring one staff to work alone with 20 children aged 6 to 12 would make recruitment for these positions even more difficult and erode job quality further.

The City has other concerns with this proposal that relate to its role as service system manager. By allowing service providers to apply to operate under a different schedule with unique requirements, an additional administrative burden is placed on local service system managers to administer a system with two sets of rules. This would have implications for funding programs, information technology infrastructure, quality assessment, and further complicates communication to parents and families about how licensed child care is delivered. Children's Services would be extremely challenged to manage, plan, and fund additional variations to these schedules or if operators are able to switch back and forth between schedules. Over the past several years the Division has streamlined and digitized a number of services for families and operators, to reduce administrative burden. Proposals that introduce new administrative burden do not support the progress we have made in these areas.

It is important to note that proposed provincial changes to cost sharing and administration funding for CMSMs would make administration of this new model even more difficult and significantly increase administrative burden.

Recommendation A1:

That the Ministry of Education not pursue proposed changes to child care Schedules. Further the City encourages the province to consider the timing of the proposed changes as the sector is continuing to respond to, and recover from, the impacts of the COVID-19 pandemic and is ill placed to implement such substantial changes.

Should the Province decide to implement the proposed alternate Schedule 2, the City request the Province work with service system managers on timelines for implementation and engage in a collaborative process on further details including funding and criteria for approval to operate under an alternate Schedule, and the role of service system managers in such decisions.

Proposal A2: Two Provider Home Child Care Model

What is being proposed?

To increase capacity of the licensed home child care sector and provide more high-quality licensed options for families, the ministry is proposing to amend O.Reg. 137/15 to allow for the provision of a two provider home child care model. This would be done by prescribing the maximum number of children who could be cared for in a two provider home child care model and would address some of the unique considerations related to the model.

The Ministry is proposing to add new regulations to O.Reg. 137/15 that would set out that:

- Two providers may offer home child care for not more than 10 children and the group cannot include more than 5 children who are younger than 2 years of age.
- Home child care agencies are to develop policies and procedures with respect to specialized training for providers in a two provider model; the type, frequency, and modality of the training would be up to the home child care agency.
- Home child care agencies are to have policies and procedures in place regarding how to address situations where one of the providers working in a two provider home child care

model is not able to work (e.g. she/he is sick). This policy would need to be reflected in the agency's agreement with the providers.

Additionally, all legislative provisions in the CCEYA and existing licensing standards in O.Reg. 137/15 that apply currently to a single provider providing home child care would apply to the two provider model (if approved), including:

- The maximum capacity of each home child care premises providing care in a two provider home model would be determined by the home child care agency (up to the maximum prescribed in regulation). Home child care agencies would be encouraged to work with local public health units and CMSMs/DSSABs to determine maximum capacity for each premises where home child care is provided
- The providers' own children under age 4 years would be counted towards the maximum number of children allowed

Consultation Findings

Proposals to develop a two provider model in licensed home child care were previously made in 2014, when the province considered allowing two providers in a home to care for up to 12 children. At the time, the proposal was opposed, on grounds of health and safety and quality, and there were significant concerns with the ability of providers to safely evacuate so many children during emergencies. It was also argued that groups of 12 children should have access to the same level of trained staff and health and safety requirements as child care centres. Following these proposals, the number of children in a licensed home child care provider home increased from 5 to 6.

Of service providers surveyed, only 19% said that they would support this change, while 34% said they disagreed or strongly disagreed with it, and 48% said they were neutral or did not know. This reasonably reflects the majority of respondents being from child care centres with less direct experience with licensed home child care. 52% of surveyed parents said they disagreed or strongly disagreed with the proposed change, while 23% supported this proposal. 54% of parents said that they were concerned with how the two provider model would impact quality, and 71% felt that the two-provider model's impact on safety was a concern for them.

Some parents expressed concern about the ability of two providers to safely care for 10 children and in particular, felt that the number of children under two years old was too high. There was also concern about the ability to accommodate 10 children with adequate space safely. Some licensed home child care providers echoed these concerns, with a few of them expressing that their homes were unsuitable for caring for more children. They also expressed that this model would take away from the "home feel" of home child care, which is what some families are looking for.

However, providers also stated that the two provider model had some benefits, such as growing the number of licensed home child care spaces and allowing providers to collaborate with each other and work together. Some parents also felt that a second provider in the home would improve safety and emergency preparedness.

Access

While the City recognizes the provincial goal of increasing access to licensed home child care, the ability of providers to expand to a two provider model is significantly impacted by the limited space available in private homes. While this change may support other areas in Ontario, in urban settings such as Toronto, very few licensed home child care providers have the space to accommodate 10 children in their home, particularly those living in apartments and/or with other family members. This space restriction adds further challenges for the inclusion of children with extra support needs. While the two provider model may enable the largely feminized, racialized, and newcomer providers to expand/grow their business, physical space constraints limit these opportunities. Furthermore, this model would be prohibited under current City of Toronto by-laws that set a maximum of 6 children in a home child care setting.

Quality, Health and Safety

Home child care providers are independent contractors of licensed home child care agencies and do not require professional designation as an RECE. If group sizes are increased, allowing up to five children under the age of two years, and up to 10 children of mixed ages, this could reduce the level of quality, given the span of development, and extra attention required for children under the age of two. Having up to five children under the age of two years is a safety concern particularly in an emergency scenario where evacuation is required.

Others suggested two providers allow for more supervision and may provide some benefit by introducing a second person to support the delivery of more tailored activities. However, increasing group sizes raised concerns among Every Child Belongs (ECB) agencies because some of the benefits of licensed home child care for children with extra support needs are related to small group sizes in the homes (ECB agencies employ resource consultants who deliver supports to children with extra support needs in licensed child care programs across the City).

It should be noted that the reality of COVID-19 makes this a questionable time to increase the number of unrelated children and adults in a home environment.

Workforce

The proposed model has the potential to decrease providers working in isolation, but raises issues around hiring, liability and the dynamics between providers. The province should provide further guidelines or standards to determine a range of hiring and administrative issues, including how a second provider within a particular home would be hired (are they, for example, an employee of the primary licenced provider?), how each provider's responsibilities are divided, which of them owns the materials used to deliver child care, who is accountable and insurance coverage etc. It may be problematic for agencies to create these guidelines themselves, as it could result in inconsistencies or raise issues of fairness if different agencies across the City are implementing different measures.

The voice of home child care providers themselves should be emphasized in this and future proposals related to licensed home child care. One specific consultation with home child care providers was held which 21 providers attended. The City would recommend engagement with licensed providers directly be prioritized in future proposals regarding licensed home child care.

Recommendation A2:

That the Ministry of Education not pursue the two provider licensed home child care model at this time but continue to collaborate with CMSMs, licensed home child care agencies, and home child care providers on an effective model.

The City recognizes the unique circumstances and community needs in different municipalities across Ontario. However this proposal comes with feasibility concerns in Toronto as well as administrative, quality, and health and safety concerns. Should the province proceed with the proposal, the City request the Ministry to work with CMSMs on establishing local authority to work with licensed home child care agencies on when and how this might be approved within jurisdictions.

Proposal A3: Authorized Recreational and Skill Building Programs

What is being proposed?

As set out currently under subsection 6(4) of the CCEYA and section 3.1 of O.Reg. 137/15, “Authorized Recreational and Skill Building Programs” may provide up to three consecutive hours of care/programming once a day, on weekdays, for children age 4 years and older (or if the program is provided on or after September 1 in a calendar year, the child will attain the age of 4 years in that year).

To address critical shortages of before- and after-school programs, the ministry is proposing to allow specified Authorized Recreational and Skill Building Programs to operate for more than three consecutive hours. The approach would first be launched with select providers as follows, who would be exempt from the requirement to restrict the program to three or fewer consecutive hours a day:

- YMCA
- Boys and Girls Clubs
- Municipal recreation programs
- First Nation entities (on reserve)
- Ontario Federation of Indigenous Friendship Centers

After a review of this new approach (if approved), the ministry may consider extending the exemption to additional program providers.

Consultation Findings

The City of Toronto has a wide range of authorized recreation and skill building programs, delivered by the City through ARC/CLASP, and by non-profit organizations. These programs are unlicensed but are subject to similar expectations as licensed

school aged programs. These programs tend to be located in communities experiencing greater inequities and tend to offer care at low or no cost, and are an important component of the child care and early years system in supporting access to programs for vulnerable families. While the city has no plans to expand ARC/CLASP to include before school programming the City welcomes the optional ability to extend hours after school, and the importance of being able to expand service to before school is recognized as important for many other service providers.

Respondents to the City's parent survey were generally in favour of this proposal, with 51% either in agreement or strongly in agreement; only 23% of respondents did not agree, and 27% did not know or were neutral. Some parents felt that this proposed change would add needed flexibility for working parents, especially shift workers. Others had concerns about the safety of authorized recreation programs, couching their support for the proposal in the need for regulations consistent with child care.

Access

Lifting restrictions to the hours of operation of authorized recreation programs would enable these programs to serve children for extended periods of time after school. Consultations revealed the current three hour maximum creates an arbitrary service barrier for programs, possibly leading to forced dismissal of children from programs earlier than when their parents may be home. Further, allowing programs to operate before school may improve access in some communities where there is no before-school care available. However, some service providers were concerned that, in lower demand areas, this change may destabilize existing licensed before and after school programs.

In general these programs tend to be more affordable as they are not subject to the same licensing requirements as licensed child care. Where funding is available (for example, through the Ontario After-School Program), authorized recreational programs are able to provide care at low or no cost to families. Expanding the availability of authorized recreation programs may increase the supply of affordable options for families.

Equity

Analysis conducted in 2018-19 revealed that Toronto's authorized recreational programs are largely located in neighbourhoods experiencing greater inequities. These programs play a critical role in supporting equitable access to after-school care in vulnerable communities. In particular, consultations emphasized the importance of these programs in providing a safe and engaging environment for older school aged children in low-income neighbourhoods, and that enabling the extension of hours of care later into the evenings supports continuity of care where parents or caregivers may be working longer hours.

Some questions were raised regarding the 'pilot' approach to this change, which only permits select providers to operate under the eased restrictions. Authorized recreational

programs are provided by many different organizations, some of which would still not be eligible to operate before school or for extended hours after school. This makes communication to families about their options more difficult and complicates an already fragmented system of middle childhood programs. Furthermore, it is not known whether there will be particular equity impacts of only allowing select providers to participate in the pilot; for example, those excluded organizations may also be largely Black-led and Black-serving. This illustrates the ongoing importance of an equity lens in legislative and policy decisions in child care and early years.

Quality

While not subject to the same licensing standards as licensed child care, or the Assessment for Quality Improvement program, authorized recreational programs maintain their own quality improvement programs, often based on the High Five Quality Assurance framework. The proposed pilot focuses on larger organizations which may have more robust quality frameworks in place. As an example, the City's ARC/CLASP programs are now fully "Accredited" with the High Five Quality Assurance Program which measures quality through three mechanisms: program quality assessments, policies, and procedures and training.

Recommendation A3:

The Ministry of Education proceed with this proposed pilot but ensure it includes a range of small and large operators to better assess impacts.

The City would welcome the opportunity to collaborate in evaluating the pilot to determine if and when the new provisions should be extended to all programs. Furthermore, given this proposal would create more similarities between authorized recreational and licensed school aged programs the province should review the licensing requirements for school aged programs under CCEYA in an effort to better align the two and address access and affordability differences.

B. Qualification Requirements

Proposal B1: Qualified Employees

What is being proposed?

Under subsection 54(2) of O.Reg. 137/15, with respect to a licensed primary/junior school age group (as described in Schedule 1 of the regulation), in addition to persons who are in good standing of the College of Early Childhood Educators or those otherwise approved by a director (i.e. ministry employee), the following are considered to be qualified employees:

- An employee who has a diploma or degree in child and youth care;
- An employee who has a diploma or degree in recreation and leisure services;
- A member in good standing with the Ontario College of Teachers

The ministry is proposing to permit a person with any of the three qualifications listed above to be considered a qualified employee for the purposes of meeting the requirement respecting the proportion of employees that must be qualified for all licensed age groups serving kindergarten age children or older. In addition to supporting employee recruitment and retention, this proposal would help prioritize the supply of early childhood educators to the province's youngest children.

Note that this proposal would apply to centres operating under the proposed Schedule 2; see proposal A1 (Schedule 2 – Requirements for Age Groupings, Ratios, Maximum Group Size, and Proportion of Qualified Staff).

Consultation Findings

Service providers were split on this issue with slightly more (47%) in support of the proposed change to qualifications compared to those not in favour (41%). Among parent respondents, 51% were not in favour with this change to qualifications, compared to the 34% that were in favour. The major concerns cited were related to quality.

Parent respondents had high regard for RECEs, recognizing their high degree of skill and training in child development. Both parents and providers saw the proposed change as undermining the profession. Even if the other credentials were included in the classroom, some parents indicated that an RECE should be a fixture in childcare settings.

Provider respondents expressed that this proposed change was not an appropriate solution to the recruitment and retention issues in the sector. Some providers also felt that out of the three qualifications proposed, only a member in good standing with the Ontario College of Teachers should be considered. There were also providers in favour of this change, who mentioned that people with different backgrounds have the potential to be strong educators in child care. They added that this change could make staffing easier for school-age programs, and they could focus on hiring RECEs for the younger age groups where they are needed most.

Access and Equity

By broadening qualifications requirements, operators may be able to exercise more flexibility in hiring which can support centres to employ diverse candidates who are reflective of the communities they serve.

Quality

Staff with child and youth work, recreation and leisure, and teaching experience were seen as potentially beneficial for program quality among older age groups (6-12 year olds). Participants voiced some support for these broader qualifications and indicated that these may not necessarily lead to a 'watering down' of quality as opposed to introducing new, complementary skill sets to child care programs. Previous consultations revealed that the early childhood education (ECE) curriculum tends to focus on younger children and does not always prepare staff to support older age

groups, however changes to curriculum, and more age-appropriate licensing requirements, could address this. As intended by the Province, service providers with all age ranges indicated this would assist in focusing their RECE resources with their younger age groups. These proposed changes would also align qualifications requirements in licensed care with authorized recreational programs, increasing consistency across the before-after school programs.

However, there were concerns with the proposal to apply this change to kindergarten age children. This change was not considered aligned with the provincial vision of a seamless full day of learning for kindergarten children wherein a consistent set of RECEs deliver common curriculum before, during, and after the school day. Lastly, supporting inclusion of children with extra support needs in before-and-after school programs is a challenge, and it is unclear whether staff educated in other fields receive training to deliver inclusive programs and environments.

Workforce

Although loosening restrictions may open up hiring to a wider pool of candidates, the underlying problem of under-compensated educators being forced to work undesirable split shifts remains – and this was stressed as the more pressing issue with before-after school programs. Additionally, some saw this proposed change as seen as eroding the professionalization efforts of the early years workforce by diluting the necessity of their RECE qualifications.

Recommendation B1:

That the Ministry of Education pursue the proposed change to staff qualifications for school age (6-12) licensed child care only.

These changes may support the delivery of more age appropriate programming and support centres in meeting staffing needs, as outlined above. Kindergarten staff qualifications should not be changed, to ensure consistency with the vision of a seamless day of learning with ECE pedagogy and RECE expertise guiding programming before, during, and after school. The Ministry should also consider reviewing licensing requirements of school age programs to support more age-appropriate program delivery.

Proposal B2: Short-Term Supply Staff

What is being proposed?

The ministry is proposing to make an amendment to section 54 in O.Reg. 137/15 to deem non-qualified persons to be “qualified employees” for the purpose of backfilling a “qualified employee” who is counted toward the required proportion of qualified employees required in situations where this person is away from work due to illness or vacation for a period of no longer than two weeks. The proposed amendment would prohibit *consecutive* backfilling by non-qualified persons.

Consultation Findings

Service provider survey responses were split on the proposal to loosen restrictions on qualified employees for the purposes of backfilling, with 40% of service providers in agreement and 42% in disagreement. In contrast, parents were heavily opposed to this proposed change – 79% did not support this proposal and cited safety and quality concerns as driving their choice.

Among providers who responded favourably, some indicated this would alleviate the pressures of finding new, short-term RECE staff on short notice.

Some parents felt this proposed change was unacceptable and potentially harmful to children. Both parents and providers expressed concerns over the safety and quality implications of supply staff without qualifications. Parents cited examples from other sectors where supply staff are mandated to have minimum equivalent qualifications to the staff they are replacing.

Quality

Some operators mentioned that staff without RECE qualifications can in fact be highly skilled and enhance program quality. Some providers raised equity considerations, as highly educated newcomer applicants who were trained overseas may not have an RECE qualification, yet often bring great skills and experience.

Research has shown that well-educated, well-trained professionals are the key factor in providing high-quality programs with the most favourable cognitive and social outcomes for children. In Ontario the RECE education and designation is the benchmark of staff qualifications and allowing these professionals to be replaced by others without such expertise is seen as a compromise on quality of the whole program. In a room with only one qualified RECE, this proposal would allow a non-qualified staff to fill that position, meaning the program could be run without a single RECE, for a period of up to two weeks. Maintaining this minimum standard is seen as important to protecting quality program delivery.

Further this proposal was considered problematic for children with extra support needs, because staff who backfill lack pre-existing relationships and knowledge of children's unique needs, so these backfilling staff were seen as requiring *more, not less* qualifications than permanent staff.

Workforce

Many operators face challenges finding staff to backfill positions and in turn lean on available staff to take on additional hours. This not only adds stress onto an already demanding workday for staff, it also increases overtime costs for operators. Having the flexibility to back-fill with “unqualified” persons was considered a benefit for operators. However, some consultation participants felt that this change had the potential to degrade hard won respect for the RECE designation and erode professionalization of the early years workforce. There was widespread concern that this proposed change did not address the root causes of staffing challenges in the early years and childcare that are rooted in the low compensation and benefits the profession tends to offer.

Recommendation B2:

That the Ministry of Education not pursue Proposal B2 to loosen qualification requirements of supply staff.

In light of other proposed changes under consideration, this would lead to too much loosening of qualifications requirements in child care. The strong opposition from parents and the implications for the reputation of the RECE designation suggest this proposal should not be pursued.

Proposal B3: Qualifications Requirements of Child Care Supervisors

What is being proposed?

The ministry is proposing to modify the requirement for supervisors to have two years of experience providing licensed child care to require that they have two years of experience in general children's programming (e.g. child care, recreation, teaching, child and youth services, etc.). This amendment, if approved, would not change the current requirement for the supervisor to be "approved by a director" in clause 53(a).

Consultation Findings

Service provider respondents were generally less supportive of changes to experience requirements for child care supervisors with 46% not in favour. Similarly, parents tended to disagree with this proposal, with 52% disagreeing, and 30% in agreement. Most parent survey respondents were concerned with quality and safety.

Parent respondents valued lived experience in a child care setting and saw after-school programs, recreation facilities, and schools as very different from child care. Some felt that in order to be an effective supervisor, staff must bring child care experience and skills to the role. Providers additionally noted that this would further dilute RECE training and reduce the already limited career development options for RECEs. Some providers said that the requirements to become a supervisor were already minimal, and did not support this proposal as they felt that it was going in the wrong direction.

Providers who were supportive of this proposal said that since Supervisors wear multiple hats, anyone with the right set of qualifications and experience in child care would be able to effectively fulfill the role.

Equity

Similar to loosening restrictions on supply staff and qualifications, this proposal was seen as having the potential to diversify the workforce to include staff with broader experiences in non-licensed settings. It was also seen as facilitating advancement of these staff.

Quality, Health and Safety

Consultation participants voiced concern about the ability of supervisors to meet expectations regarding stringent legislative, regulatory, and licensing requirements in child care without at least two years of experience specifically in a child care setting.

Some participants felt that two years of experience was insufficient to take on a leadership role in child care, which requires extensive knowledge in health and safety, quality, and inclusion. The role of the supervisor as a pedagogical leader in the program is critical to the delivery of high-quality learning environments, and this skill can be well developed through experience in a child care setting.

Workforce

Some supporters of this proposal highlighted it may diversify skills in the workforce in a positive way. Staff with experience in resource roles and quality assessment, for example, were seen as having excellent supervisory potential. Additionally, removing the restriction of child care experience added flexibility for operators and enabled more rapid advancements for RECEs in the field. However these comments were contrasted with those who felt this also amounted to eroding the professionalization of the sector and undervaluing the reputation of the RECE designation.

Recommendation B3:

The Ministry of Education not pursue this proposed change.

The supervisor is a critical position in the leadership of the staff, professional development, administration, and accountable for adhering to provincial licensing requirements, pedagogy and the delivery of a high quality child care environment. Two years' experience in a licensed child care program is important to support success of the program and workforce. Additionally, maintaining this requirement supports efforts to recognize the importance of the profession.

Proposal B4: Resource Teachers

What is being proposed?

The ministry is proposing to change the term “resource teacher” to “resource consultant” in O.Reg. 137/15 to more accurately reflect the role these professionals play in supporting inclusion.

The ministry is also proposing to make an amendment that removes the “director approval” requirement so that hiring decisions reside solely with employers (namely community agencies and service system managers). If this proposal is approved, this means that the employers of prospective resource teachers/ consultants would be able to determine which post-secondary programs of studies that are both theoretical and practical and that relate to the needs of children with special needs would be appropriate to meeting the qualification requirements.

Consultation Findings

Parents and service providers were not surveyed about the proposed changes to resource teachers; however, a virtual consultation was conducted with representatives from ECB agencies who deliver supports to children with special needs in licensed child care programs across the City. Agency representatives were in favour of proposed change in terminology and felt that the term resource “consultant” was considered better aligned with the duties of resource staff than resource “teacher”. There were concerns about the proposal to remove director approval as this was seen to reduce

accountability, the requirement of director approval was considered an important step to keeping the Ministry informed of staff turnover in programs. In addition, the proposal to allow employers to determine qualified post-secondary programs was seen as too broad, some direction or parameters should be provided. Without these parameters could result in a loss of consistency in skillsets in the resource consultant role.

Recommendation B4:

That the Ministry of Education implement the proposed change in language to “resource consultant,” but not proceed with changes to qualification requirements.

The Ministry should maintain a role in setting parameters around what qualifications are minimally needed for the resource consultant position to protect consistency across the Province for children with extra support needs and their families.

C. Administrative/Regulatory Burden

The majority of the proposals regarding administrative burden are supported. There are however two opportunities where additional suggestions and comments are being made.

Proposal C1: Time Allowance for First Aid Certification

What is being proposed?

The ministry is proposing to provide newly-hired staff in child care centres who must be first aid certified per s. 58(2) of O. Reg 137/15 with a three month time period to obtain their certification, as long as at least one first aid certified employee is onsite at all times.

Similarly, if one provider in a two-provider home child care premises (see part A2 (Two Provider Home Child Care) of this document) meets the first aid certification requirements set out in the regulation, the other could be provided with up to three months to obtain his/her certification.

This amendment, if approved, would allow licensees to quickly hire centre staff (where there are already employees with first aid certification at the program) and rapidly contract home child care providers for the two-provider model, helping to address ongoing recruitment challenges experienced by licensees.

Recommendation C1:

That the Ministry of Education consider extending the three month time allowance to any employees who were away from work due to a maternity/parental leave, leave of absence, or other leave, and required to update their first aid certification upon returning to work.

Proposal C5: Digital Records etc.

What is being proposed?

The ministry is proposing to add a provision to both O.Reg. 137/15 and O.Reg. 138/15 that would clarify, for greater certainty, that every record, policy, individualized plan, parent handbook, program statement, child registration, copy of agreement, or other document required in the regulations may be created, provided, and stored in an exclusively electronic/digital format.

The regulation would also provide, for greater certainty, that such digital documents must be available at all times for inspection. Licensees could still choose to print and distribute physical, hard copies of required documents, handbooks, etc. if they wish to do so.

Current requirements regarding posting of certain hard copy documents would continue to exist (e.g. for serious occurrence reports, fire procedures, menus, allergy/allergen list, etc.).

Recommendation C5:

The Ministry of Education consider extending the digital records proposal to include other posted documentation (policies and procedures, inspections, menus), so that licensees may keep digital or scanned records of more documents and reduce the amount of posted materials in a centre.

Discussion: Novel Policy Approaches and Concepts

As part of the five year review of the CCEYA, the Ministry is seeking input on innovative or novel policy approaches for the future. While these do not constitute actual proposals at this time, the City would like to take the opportunity to provide a response regarding one proposal, concerning a registry of unlicensed child care providers and draw attention to additional opportunities to advance equity, anti-racism, and inclusion.

Registry of Unlicensed Child Care Providers

The Ministry is considering the idea of developing a registry of unlicensed child care providers. By establishing the registry, the province is seeking to support child care delivered in the unlicensed sector. The province suggests that a registry might help with the following:

- communication with unlicensed providers;
- ability to share information about pedagogy, health, and safety with unlicensed providers;
- help parents locate child care providers in their communities.

Consultation Findings

This proposal has generated a mixed response through the consultation process. Of those who responded to the parent survey, 56% agreed with the concept of an unlicensed registry, and 22% disagreed. Some parents found the concept of a registry of unlicensed providers confusing and thought it suggested that the registrants were somehow “vetted” by the government, giving some parents a false sense of security when in fact there is no oversight. Parents also called attention to potential equity impacts, stating that the registry would create a “two-tiered” system and low-income families would be pushed toward unsafe and low-quality care. Among respondents who agreed with the idea of a registry, there was a presumption that the registry would also mean stricter regulations and requirements would be enforced.

Among service provider respondents, 48% agreed with the proposal, 25% disagreed, and the remainder were neutral or did not know. Those who disagreed cited many of the same reasons as parent respondents (i.e. that providers on the list were “endorsed” or

“vetted” which could lead to serious safety issues). Those who supported the idea said that it could increase transparency and awareness about the unlicensed sector, and arm parents with more information when making child care choices. They also expressed that this could increase accountability, data collection and oversight of the unlicensed sector.

Access

While a public registry may help some families find unlicensed care in their community there was some concern that the proposal may cause more confusion than clarity. Currently there is little public awareness of the distinct benefits of licensed home child care as opposed to unlicensed. Some concerns were raised that a government registry would blur the distinctions further, and does little to respect the significant health, safety, training, and other requirements that licensed providers work hard to meet.

Quality, Health and Safety

The use of a registry to communicate to unlicensed providers, and provide them with resources regarding health, safety, and pedagogy, is in the interest of children’s safety in those programs. 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.

Recommendation:

That the Ministry of Education not pursue this registry and instead focus more effort on encouraging unlicensed providers to join the licensed home child care sector.

Additional Opportunities

Although substantive, the proposed changes miss opportunities to support Indigenous-led and culturally relevant programming. We continue to recognize opportunities within the CCEYA to prioritize equity, confront racism, and advance inclusion in order to meet the needs of diverse children and families, and encourage the Ministry to consider the submission from Toronto Children's Services provided as part of the 5-year review. The City in particular would like to re-stress the following recommendations:

1. Enhancing section 49 of the Act (“provincial interest”) to explicitly recognize that the child care and early years system should strive to identify and remove systemic barriers (including systemic racism) which ultimately serves to benefit all communities.
 - a. TCS also recommends the explicit mention of Black communities and/or anti-Black racism [City of Toronto, 2020].
2. Advancing the availability of culturally responsive programs for Black and Indigenous children and families.

- a. Increasing the supply and variety of culturally appropriate before- and after school programs including STEAM (science, technology, engineering, arts and math) programs to meet the needs of Black families (as indicated in the CABR action plan)[City of Toronto, 2017].
- b. Changes are needed to ensure that Black children and youth, including those who identify as queer and transgender, have access to the programs, protections, and supports that all children and youth need to grow up healthy, safe, and confident. [City of Toronto, 2017].
- c. Through consultations, TCS heard that Black families and families with a child with extra support needs were the least likely to feel that programs were culturally reflective [Gladki, 2020].
- d. There is a significant lack of programming and supports for Indigenous children aged 7-12. Indigenous worldviews often include the entire family across the lifespan and because Indigenous families are often larger and intergenerational, the inability of children in the middle childhood years to be served by child and family centres is considered counterproductive to building strong families and communities. As well, a lack of programming in a centre for older children may prevent families with from attending if older children will not be engaged [TASSC, 2017].

Conclusion

The City of Toronto looks forward to continued partnership co-developing and implementing any forthcoming amendments. Toronto's children, families, and child care and early years service providers and staff have faced unprecedented challenges in recent months as a result of the COVID-19 pandemic. A full recovery from the pandemic will take some time, and it is important to leverage the learnings from this experience to rebuild a stronger early learning and child care system in Toronto through equitable policies. The value of stringent health and safety requirements and regulations, and expectations of staff qualifications, were on demonstration during the response to the first wave of COVID-19, and the child care and early years sector continues to show considerable resiliency in responding to the pandemic. The commitment of RECEs has been essential to these successes.

The City is committed to working with other orders of government, service provider partners, and children and families, and welcomes any future opportunities to collaborate on improvements that improve accessibility, affordability, equity, and quality for families, while recognizing, valuing, and supporting the early years' workforce to thrive.

Appendix A: Schedules of requirements for Age Groupings, Ratios, Maximum Group Size, and Proportion of Qualified Staff

Current Schedule 1 Requirements

| Name of Age Category | Age Range | Ratio of Staff to Children | Maximum number of Children | Proportion of Qualified Staff |
|---------------------------|--------------------|----------------------------|----------------------------|-------------------------------|
| Infant | 0-18 months | 3 to 10 | 10 | 1/3 |
| Toddler | 18-30 months | 1 to 5 | 15 | 1/3 |
| Preschool | 30 months-6 years | 1 to 8 | 24 | 2/3 |
| Kindergarten | 44months-7 years | 1 to 13 | 26 | 1/2 |
| Primary/Junior School Age | 68 months-13 years | 1 to 15 | 30 | 1/2 |
| Junior School Age | 9-13 years | 1 to 20 | 20 | 1/1 |

Proposed Schedule 2 Requirements

| Name of Age Category | Age Range | Ratio of Staff to Children | Maximum number of Children | Proportion of Qualified Staff |
|---------------------------|----------------------|---|----------------------------|-------------------------------|
| Infant/Toddler | 0-24 months | 1 to 3 (0-12 months) 1 to 4 (12-24 months) | 12 | 2/3 |
| Preschool | 24 months-5 years | 1 to 8 | 24 | 2/3 |
| Kindergarten | 44 months to 7 years | 1 to 13 | 26 | 1/2 |
| Primary/Junior School Age | 68 months-13 years | 1 to 20 | 20 | 1/2 |
| Junior School Age | 9-13 years | 1 to 20 | 20 | 1/1 |

Appendix B: List of Draft Recommendations

| Proposal Number | Draft Recommendation |
|--|---|
| A1 – Schedule 2 Requirements | That the Ministry of Education not pursue proposed changes to child care Schedules. Further the City encourages the province to consider the timing of the proposed changes as the sector is continuing to respond to, and recover from, the impacts of the COVID-19 pandemic and is ill placed to implement such substantial changes. Should the Province decide to implement the proposed alternate Schedule 2, the City request the Province work with service system managers on timelines for implementation and engage in a collaborative process on further details including: funding, criteria for approval to operate under an alternate Schedule, and the role of service system managers in such decisions. |
| A2 – Two provider Home Child Care Model | That the Ministry of Education not pursue the two provider licensed home child care model at this time but continue to collaborate with CMSMs, licensed home child care agencies, and home child care providers on an effective model. The City recognizes the unique circumstances and community needs in different municipalities across Ontario. However this proposal comes with feasibility concerns in Toronto as well as administrative, quality, and health and safety concerns. Should the province proceed with the proposal, the City request the Ministry to work with CMSMs on establishing local authority to work with licensed home child care agencies on when and how this might be approved within jurisdictions |
| A3 – Authorized recreation and skill building programs | The Ministry of Education move forward with this proposed pilot but ensure it include a range of small and large operators to better assess impacts. The City would welcome the opportunity to collaborate in evaluating the pilot to determine if and when the new provisions should be extended to all programs. Furthermore, given this proposal would create more similarities between authorized recreation and licensed school aged programs the province should review the licensing requirements for school aged programs under CCEYA in an effort to better align the two and address access and affordability differences. |
| B1 – Qualified Employees | That the Ministry of Education pursue the proposed change to staff qualifications <u>for school age (6-12) licensed child care only</u> . These changes may support the delivery of more age appropriate programming and support centres in meeting staffing needs, as outlined above. Kindergarten staff qualifications should not be changed, to ensure consistency with the vision of a seamless day of learning with ECE pedagogy and RECE expertise guiding programming before, during, and after school. The Ministry should also consider reviewing licensing requirements of school age programs to support more age-appropriate program delivery. |

| Proposal Number | Draft Recommendation |
|---|---|
| B2 – Short term supply staff | That the Ministry of Education not pursue Proposal B2 to loosen qualification requirements of supply staff. In light of other proposed changes under consideration, this would lead to too much loosening of qualifications requirements in child care. The strong opposition from parents and the implications for the reputation of the RECE designation suggest this proposal should not be pursued. |
| B3 – Child care center supervisors | The Ministry of Education not pursue this proposed change. The supervisor is a critical position in the leadership of the staff, professional development, administration, and accountable for adhering to provincial licensing requirements, pedagogy and the delivery of a high quality child care environment. The two years in a licensed child care program is important to support success of the program and workforce. Additionally, maintaining this requirement supports efforts to recognize the importance of the profession. |
| B4 – Resource teachers | That the Ministry of Education implement the proposed change in language to “resource consultant,” but not proceed with changes to qualification requirements. The Ministry should maintain a role in setting parameters around what qualifications are minimally needed for the resource consultant position to protect consistency across the Province for children with extra support needs and their families. |
| C1 – Time allowance for First Aid Certification | That the Ministry of Education consider extending the three month time allowance to any employees who were away from work due to a maternity/parental leave, leave of absence, or other leave, and required to update their first aid certification upon returning to work. |
| C5 – Digital records etc. | The Ministry of Education consider extending the digital records proposal to include other posted documentation (policies and procedures, inspections, menus), so that licensees may keep digital or scanned records of more documents and reduce the amount of posted materials in a centre. |
| Unlicensed Registry | That the Ministry of Education not pursue this registry and instead focus more effort on encouraging unlicensed providers to join the licensed home child care sector. |

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