

Re: EC17.12

# Response to Proposed Regulations under the Child Care and Early Years Act, 2014

Presentation to Economic and Community Development  
Committee

November 12<sup>th</sup>, 2020



# Background

- The Province has proposed regulatory changes through its 5-year review of the Child Care and Early Years Act (2014) including:
  - Significant changes to child care age groupings, staff to child ratios, maximum group sizes, and staff qualifications, as well as a new approach to licensed home child care.
- To inform the City's position on proposed changes, Toronto Children's Services undertook consultations including:



Online surveys to parents and service providers



Virtual sector stakeholder consultation sessions with early years and recreation partners

# Overview of Proposed Regulatory Amendments

Proposals are intended to support the province's four goals

- increasing flexibility and choice,
- improving affordability,
- reducing administrative burden, and
- enhancing quality

Proposals include:

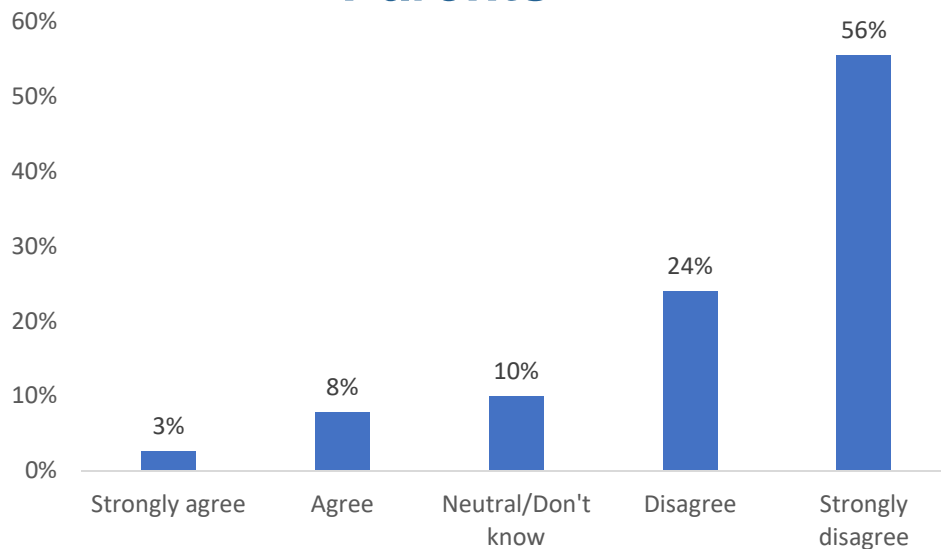
- Changes to licensing standards including age groups, ratios, group sizes and qualified staff requirements.
- Qualification requirements of staff working in licensed child care
- Introduction of a two provider model of licensed home child care
- Development of a registry of unlicensed child care providers

## Proposed Schedule 2

- This proposal would allow child care operators to choose between two schedules with different requirements.
- The proposed second set of requirements, called “Schedule 2”, includes some significant changes, including:
  - Mixing infants and toddlers into one group of children up to an age of 24 months, and increasing the maximum group size from 10 to 12,
  - Reducing the age children enter preschool from 2.5 to 2 years old, and
  - Decreasing the ratio of staff to children in the school age group, from 1 staff to 15 children, to 1 to 20.

# What we Heard: Proposed Schedule 2

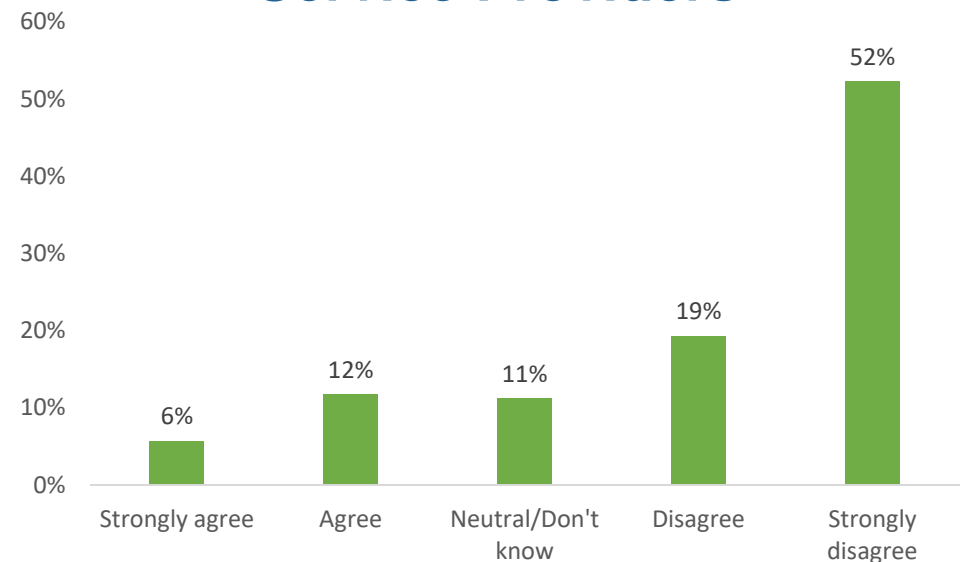
## Parents



“Planning for quality programming for ages 2-5 looks very different. The staff would not be able to plan and deliver a program that meets every child’s needs.”



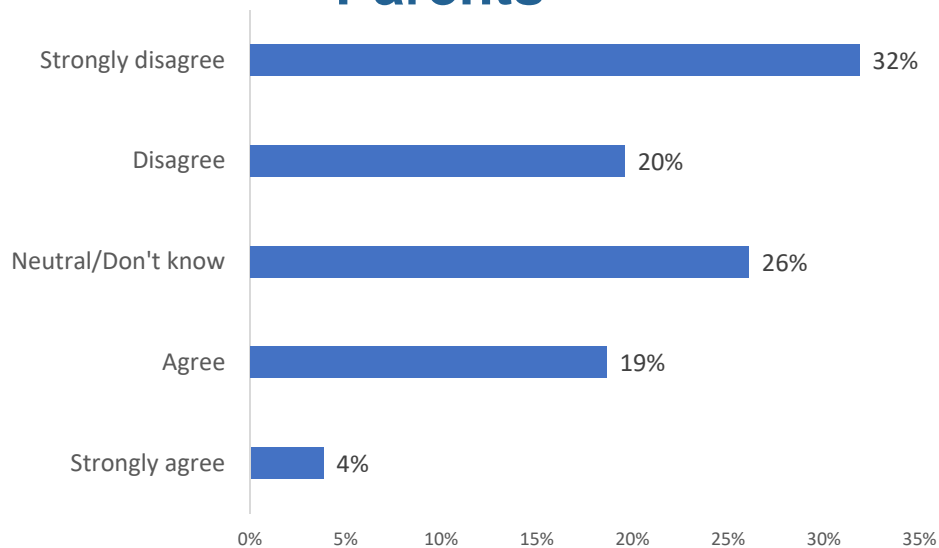
## Service Providers



“Particularly at a time when we are dealing with the additional requirements imposed by the pandemic, any change that would reduce the ratio of caring adults to children is not just inadvisable, but putting children at increased risk.”

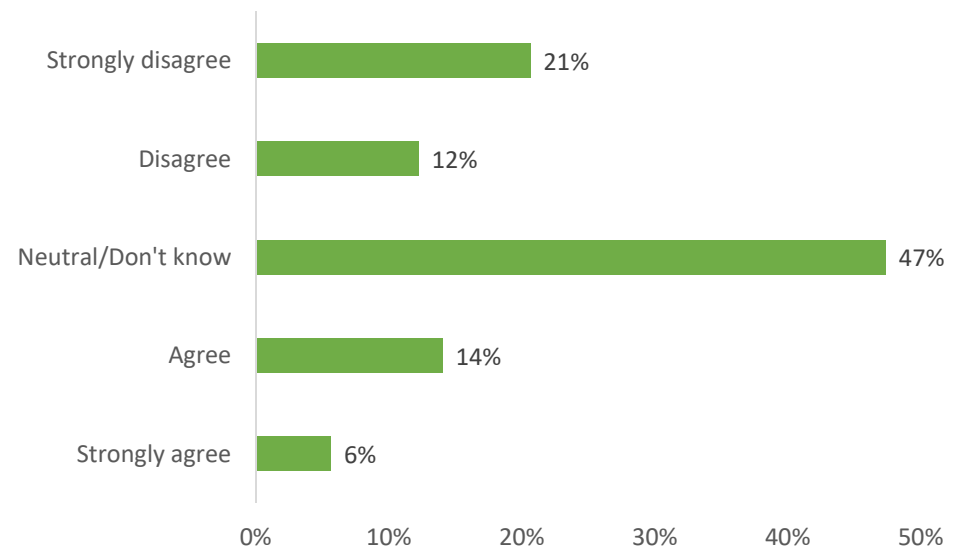
# Two provider home child care model

## Parents



"I like the idea of having more than one child care provider in a home care. I feel that one provider can get overwhelmed and may not be able to manage ... with 5 kids. I am concerned that having up to 5 kids under 2 for the 2 providers may be too much."

## Service Providers



"I operate my home daycare in my condo unit which is not suitable for a bigger number of children space-wise."

# What we Heard: Qualifications

Response	<u>Kindergarten and school age</u>		<u>Supply staff</u>		<u>Centre supervisors</u>	
	Parents	Service Providers	Parents	Service Providers	Parents	Service Providers
Agree	35%	47%	14%	40%	30%	39%
Disagree	51%	41%	79%	42%	52%	47%

## Parents

“If a qualified employee is away they should be replaced by an employee with the same qualification. It would be the same in any field where you are entrusting the life and safety of a person in a professional hand.”

“I can understand how the other diplomas listed are relevant to educating children but isn't this diminishing the work and credentials of RECEs?”

## Service Providers

“It should still be a high priority to create a stronger RECE work force by making this a more desirable field of education to go into and better wages!”

“I feel this will make it easier to staff the school age program and focus the RECEs on the younger age groups.”

# Potential Impact

Quality

Health and  
Safety

Affordability

Access

Equity

Early Years  
Workforce

- Staff considered potential impacts of major proposed changes in six key areas.
- Many of the proposed changes would have a negative impact on quality of care for children and would undermine the Early Childhood Education workforce.
- Also have concerns with the timing given COVID-19 pandemic, and administrative impacts of proposed changes.



# Key Recommendations

Amendment Area	City's Recommendation
<b>Flexibility and Responsiveness</b>	<ul style="list-style-type: none"><li>• Oppose “Schedule 2” changes to age groupings, ratios, maximum group sizes, and proportion of qualified staff.</li><li>• Oppose two-provider home child care model at this time as it requires further consideration.</li><li>• Support changes to authorized recreational and skill building programs which extend hours of care after school.</li></ul>
<b>Qualification Requirements</b>	<ul style="list-style-type: none"><li>• Support changes to qualification requirements for licensed school age programs. But oppose changes for the kindergarten age groups</li><li>• Oppose the changes to qualifications for child care centre supervisors and short-term supply staff.</li></ul>
<b>Unlicensed Child Care Registry</b>	<ul style="list-style-type: none"><li>• Oppose the introduction of an unlicensed registry but encourage province to bring unlicensed providers to enter the licensed home child care sector.</li></ul>

# What's Next

- Province accepting feedback until November 20, 2020.

Children's Services will continue to:

- Focus on stabilizing the sector, recovery, and rebuilding.
- Collaborate with all orders of government on the early years, in preparation for a national Child Care System.
- Emphasize the importance of an equity lens in legislation and policy regarding child care and early years.

# Appendix: Comparison of current Schedule 1 to Proposed Schedule 2

## Schedule 1: Current Requirements

Name of Age Category	Age Range	Ratio of Staff to Children	Maximum number of Children	Proportion of Qualified Staff
<b>Infant</b>	0-18 months	3 to 10	10	1/3
<b>Toddler</b>	18-30 months	1 to 5	15	1/3
<b>Preschool</b>	30 months-6 years	1 to 8	24	2/3
<b>Kindergarten</b>	44months-7 years	1 to 13	26	1/2
<b>Primary/Junior School Age</b>	68 months-13 years	1 to 15	30	1/2
<b>Junior School Age</b>	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
<b>Infant/Toddler</b>	0-24 months	1 to 3 (0-12 months)	12	2/3
		1 to 4 (12-24 months)		
<b>Preschool</b>	24 months-5 years	1 to 8	24	2/3
<b>Kindergarten</b>	44 months to 7 years	1 to 13	26	1/2
<b>Primary/Junior School Age</b>	68 months-13 years	1 to 20	20	1/2
<b>Junior School Age</b>	9-13 years	1 to 20	20	1/1