

Response re: proposed changes to Regulation 262 under the *Day Nurseries Act*

For some time, we have argued that a much more robust approach to policy is required in order to begin transform child care into a well-functioning component of Ontario's early learning continuum. A more robust approach to a policy framework was described in some detail in the OECD report reviewing Canada as part of a 20 country Thematic Review of ECEC in 2004¹.

In the absence of accessible, high quality child care options, many parents continue to use unregulated child care arrangements. Following multiple tragic child deaths in unregulated child care, the provincial government has proposed closing loopholes that have long facilitated various forms of unregulated child care. Although these form a welcome part of new, far-reaching child care legislation tabled in the legislature early in December 2013, these changes will not alleviate the issue of access: there are far from enough regulated child care spaces and regulated child care is far too expensive for many parents. As a result, parents will continue to rely on unregulated child care—legal and illegal. That is, the policy development needed to accompany Bill 143 to transform child care into an accessible high quality system has not been undertaken.

Today the importance of quality in child care is well recognized. In [redacted] (2012), for example, the OECD observes that the many potential benefits of ECEC programs are "conditional on quality". Expanding access to services without attention to quality will not deliver good outcomes for children or the long-term productivity benefits for society. Furthermore, research has shown that if quality is low, it can have long-lasting detrimental effects on child development, instead of bringing positive effects". However, while the term "quality" is often invoked in Ontario, in reality, the work of putting rhetoric into action has not begun.

Bill 143, [redacted] , aims to "improve safety and help foster the learning, development, health and well-being of children". In addition to tightening rules for unregulated child care, the new legislation will: clarify which programs require a license; provide government and its inspectors greater authority and enforcement tools; increase the number of children permitted in regulated home child care ("private home day care"); establish multi-provider (group) regulated home child care and affect many other aspects of child care in Ontario.

Our view, generally shared by the child care community, is that the proposed legislative changes have the capacity, with fairly minor amendments, to form a basis—with additional well-designed policy development— for transforming child care in Ontario.

¹ OECD (2004).

"Encourage provincial governments to develop, with the major stakeholder groups, an early childhood strategy with priority targets, benchmarks and timelines, and with guaranteed budgets to fund appropriate governance and expansion develop a Provincial Plan for Early Childhood Services Development, rolled over on a three-year basis, with clearly spelt out goals, targets, time-lines, res

Our further view, however, is that the government's [redacted] [redacted] includes a number of changes that contradict the aim of both Bill 143 to "improve safety and help foster the learning, development, health and well-being of children" and the Guiding Principle stated in [redacted] Commitment to quality programs for all children", as well as further undermining the current regulated child care system in Ontario.

Specifically, we believe that [redacted] s proposals to change age groupings, thus reducing ratios and increasing maximum group sizes, as well as increasing the number of young children in a regulated family child care home and the specific proposals for multi-age groupings will move child care in Ontario backwards, not modernize it.

We submit that the research on quality and ratios/group size, which we have reviewed thoroughly, does not support the government's proposed changes. Our more specific concerns are below in short form.

Thus, key elements of child care policy such as ratios and group sizes need to be examined as part of a more holistic, comprehensive approach to policy development.

5. Number of young children in regulated family child care homes

The US National Institute of Child Health and Human Development study, one of the biggest studies of child care and child development conducted to date, found that good adult: child ratios and group sizes were the best predictors of positive care giving for infants across all child care settings.

The provincial government has proposed to increase the allowed number of children in a regulated home child care setting in two ways: a) increasing the total number from 5 to 6, although now specifying that the 6 must include the provider's own preschool-age children (in the new legislation); and b) removing the limitation by age group, so that the "3 under 3" rule will be removed (in the proposed regulation changes). The net effect of these two changes is that a caregiver in a private home will now be able to care for 6 two-year-olds. This is approximately two too many children from a safety perspective, let alone quality.

We suggest that the net effect of these changes (in Bill 143 and proposed Regulation 262) is to increase the number of young children per caregiver inappropriately and should be reconsidered. The provincial government should consider alternative ways of "incentivizing" family child care providers to become part of regulated agencies. These could include reducing the number of children in an unregulated home rather than increasing the number of children in a regulated home or by base-funding public and non-profit family child care agencies as do other provinces that use an agency model (rather than assuming the agencies will fund the

regulated child care programs, impede transparency and create enormous confusion amongst parents and educators.

We think that this solution of provider choice of parallel regulations to providing flexibility is unacceptable as provincia