



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

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Cathy Abraham
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March 18, 2019

To: Dave Smith, MPP (Peterborough—Kawartha) and
Chair of the Standing Committee on General Government

Re: OPSBA Submission regarding Bill 66, Restoring Ontario's Competitiveness Act.

As the province's leading advocate for public education, the Ontario Public School Boards' Association (OPSBA) would like to take this opportunity to address some of the proposed amendments being considered in Schedule 3 of Bill 66, Restoring Ontario's Competitiveness Act. This particular schedule contemplates changes to the *Child Care and Early Years Act* and the *Education Act*.

We understand the government's intent for this overall legislation and in particular for Schedule 3, to offer more affordable choices for parents and to potentially eliminate barriers to programs and services. Since the introduction of full-day kindergarten, OPSBA has had a long standing history of supporting local decision-making by our member boards. In terms of before-and-after school programming, we have some member boards offering this directly, but the vast majority have engaged in successful partnerships with third party providers. We have always advocated for high quality, affordable child care and note that many child care centres are located in our public schools.

The comments below reflect feedback from an informal survey we distributed to trustees and early learning leads within our member boards.

Child Care and Early Years Act (CCEYA)

The majority of the proposed amendments to the CCEYA involved changes to the number of children to adult ratios for home providers. We must re-state that quality of staff and quality of care should not be compromised. The change that would lower the age (from six to four years of age) for children participating in authorized recreational and skill building programs garnered more feedback and connect to the *Education Act* change.

Education Act

The proposed change in this Act repeals the requirement for an Early Childhood Educator (ECE) to lead a before-and-after school program. School boards that enter into third party agreements with licensed child care providers would still continue to have an ECE in those before-and-after school programs as required by legislation. However, boards could now enter into third party agreements with authorized recreational programs, who are now able to offer

programming for children as young as four years old. These programs do not have to be led by an ECE.

Before commenting on this specifically, OPSBA did respond in April 2016 to a regulatory consultation document that asked about Multiple Modes of Delivery. At that time, we stated the following:

“We remain supportive of offering multiple options for b/a school care and recognize the role of other providers such as recreation programs and those funded by the Ministry of Tourism, Culture and Sport. Our members felt that the system needed to be flexible and respond to parents’ needs by allowing them options that fit their children and family dynamics.”

Currently more than half our member board respondents have agreements with authorized recreation programs for children aged six years and older. However, when asked about support for a lower age threshold, the results were split and suggest more time is needed to discuss this before implementation. A re-occurring theme was the support for the expertise of ECEs as the most qualified individuals to be working with younger children.

Concerns expressed then and now included safety, supervision, program consistency, and transportation to any off-site location. Other comments included the differences in cost and possible confusion around multiple programs within one school. We were also reminded that families with fee subsidies are not always accepted, which has created inequities.

Other comments and questions from our members included:

- Authorized recreation programs should only be permitted to operate in schools if they are designed and staffed appropriately with qualified Early Childhood Educators.
- Any new provider could help provide more children with a seamless day and ease transitions from one phase of care to another.
- Some caution is warranted. Recreation programs do not have the same ratios, reporting requirements in the event of a serious injury, experience with Individual Education Plans (IEPs) and student accommodation and understanding of how learning happens.
- The current before-and-after system took many years to develop and implement, which should be considered here.
- It allows greater flexibility and opportunity for parents.
- Registered Early Childhood Educators (RECE) must be leading these programs. The standard of their training and expertise is accredited by their institutions and they also have a professional college to oversee Professional Development opportunities and discipline. RECEs have an educational background in child development, age-appropriate programming (including safety), and social skills development.
- There must be provincial guidelines and support if the amendments are approved. The age group (four to twelve) is quite broad and programming needs to differ significantly for each age group.
- It would seem reasonable to include an option for younger children in third party after school recreation programs.
- Authorized recreation programs do not have to meet the same standards. While some do, others have been known to cancel programming without warning, don’t communicate well with families and have created supervision gaps, at times.
- How much physical space would be required for new programs, would this impact existing activities? Could before-and-after care and authorized recreation exist at the

same school at the same time? The disruption to current programs could potentially be significant.

- It matters who the providers are and how they will operate within schools. What does the service agreement look like and is there a recovery of costs or are these programs expected to operate for free?
- The addition of the word "authorized" by the government creates additional barriers for communities to be able to offer programming for children. This change would return the ability to recreation programs (not exclusive to authorized recreation) to provide programming to four and five year olds that was offered in the past. This is not a lowering of the age, lowering of quality or a bad thing, rather this is responding to the ability of the recreation sector to provide quality, accessible programming for four and five year olds as they had prior to the provincial changes to the *Child Care and Early Years Act*. The quality in recreation programs continues to be monitored through staff training, program development and development such as HIGH 5; recreation program ratios are also in line with best practices.

With the commencement date of July 1, 2019, we request there be ministry-coordinated discussions with school boards and child care providers in order to share common concerns and information. School boards need a better understanding of the quality assurance initiatives and programming standards in recreation and authorized recreational programs.

We will be asking the Ministry of Education to follow up on this request.

Sincerely,

A handwritten signature in black ink that reads "Cathy Abraham". The signature is written in a cursive, flowing style.

Cathy Abraham
President
Ontario Public School Boards' Association

The Ontario Public School Boards' Association represents public district school boards and public school authorities across Ontario, which together serve more than 1.3 million public elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA is seen as the credible voice of public education in Ontario and is routinely called on by the provincial government for input and advice on legislation and the impact of government policy directions.

cc:
The Honourable Lisa Thompson, Minister of Education
Nancy Naylor, Deputy Minister, Ministry of Education