



**November 20, 2020**

The Honourable Stephen Lecce, Ontario's Minister of Education  
Ministry of Education  
5th Floor, 438 University Ave.  
Toronto, ON  
M5G 2K8

## **Re: Proposed Regulatory Amendments under the Child Care and Early Years Act**

Dear Minister Lecce,

The Ontario Municipal Social Services Association (OMSSA) is a non-profit association whose members are Ontario's Service System Managers – Consolidated Municipal Service System Managers (CMSMs) and District Social Services Administration Boards (DSSABs). In Ontario, core social services like income support, child care and early years services and community housing are planned, managed and co-funded by Service System Managers.

OMSSA and its members appreciate our strong relationship with the Ministry of Education and the opportunity to provide consultation on the proposed regulations currently posted under the *Child Care and Early Years Act* (CCEYA). Ontario's Service System Managers have been able to provide feedback directly to the Ministry of Education through the Early Years and Child Care Provincial-Municipal Technical Table and through OMSSA's Children's Services Network.

Our members also participated in summits focused on early years and child care in 2019 and 2020. Over the past five years since the CCEYA was implemented, the early years and child care sector has made significant gains. Ontario's CMSMs and DSSABs want to build on those gains and work in partnership to expand early years and child care in communities across Ontario.

OMSSA has made several submissions related to the five-year review of the *Child Care and Early Years Act* and Ontario's new child care plan:

[Submission on Ontario's Five-Year Review of the Child Care and Early Years Act](#) (Aug 2020)

[Submission on Ontario's New Child Care Plan](#) (March 2019)

[Submission on Child Care Regulations Under Bill 66](#) (Jan 2019)

[OMSSA Policy Brief: Child Care and Early Years Services in Ontario](#) (Updated Nov 2020)



In response to the COVID-19 pandemic, Ontario's Service System Managers acted quickly to deliver emergency child care to support front-line and essential workers. CMSMs and DSSABs also worked closely with the Province during the recovery and reopening periods. Today, Service System Managers and the Ministry of Education continue to work closely to sustain the early years and child care system and enable a return to full capacity.

Investing in the early years and child care sector is critical to Ontario's economic recovery. It is crucial to support the expansion of licensed child care spaces and work towards improving quality, access and affordability. Choice should be based on quality and safety. Often, parents are forced to make a choice based on affordability or availability.

OMSSA's members believe it is a top priority to sustain the sector at a time when many spaces are closing due to the COVID-19 pandemic. Staffing remains a challenge and a strategy is needed to recruit and retain qualified RECEs, who are currently underpaid based on their value to the system. Efforts should be made to promote licensed child care spaces, with incentives to bring non-licensed providers into the licensed system. The COVID-19 pandemic is not over, and support is required to meet public health guidelines, provide operators with PPE and keep ratios at levels that are safe and enable reduced spread of the virus.

### **CCEYA Proposed Regulatory Amendments**

The *Child Care and Early Years Act* recognizes the essential role of CMSMs and DSSABs as the local Service System Manager in ensuring an increasingly integrated, high-quality child care and early years system. Early years and child care services are crucial in the early stages of child development, and during the pandemic, we have seen first hand that child care is crucial to economic recovery in Ontario and Canada.

OMSSA members have expressed concerns around increasing ratios, reducing qualifications and the potential registry for the non-licensed sector. CMSMs and DSSABs are in support of amendments dealing with administration and regulatory burdens and on health and safety.

### **Flexibility and Responsiveness**

#### **A1. Schedule 2 – Requirements for Age Groupings, Ratios, Maximum Group Size, and Proportion of Qualified Staff**

#### **A2. Two Provider Home Child Care Model**

CMSMs and DSSABs have expressed concerns about increasing ratios, especially during the COVID-19 pandemic. OMSSA members believe these measures would reduce quality, increase

risk, and would represent a step backwards for the sector. OMSSA expressed similar concerns around Bill 66 and previous attempts to increase ratios, and do not support these amendments as proposed.

## **Qualification Requirements**

### **B1. Qualified Employees**

### **B2. Short-Term Supply Staff**

### **B3. Qualification Requirements for Child Care Centre Supervisors**

Staffing has been a major challenge for the child care and early years sector, both during the COVID emergency and reopening periods, as well as prior to the pandemic. A provincial recruitment and retention strategy is required to ensure we have enough qualified people working in the sector. RECEs working to provide emergency child care were left out of the list of “essential workers” who received pandemic pay. As well, significant wage disparities exist between RECEs working in child care versus those working for school boards. Compensation does not reflect the value of work provided and discourages people from choosing this career path.

Registered Early Childhood Educators are essential to ensuring quality in the system. Easing the qualifications for supervisors and staffing results in reducing quality, while not addressing the core issue of recruitment and sustaining qualified staff. ECEs need to be fairly compensated for their work to keep qualified staff providing high quality services.

OMSSA recognizes the need to support recruitment, retention and to backfill positions. It is also acknowledged that this is a key challenge in Northern Ontario and in rural areas. CMSMs and DSSABs have concerns that these amendments will have long-term implications of watering down qualifications in the legislation. The Province should consider making these changes on a temporary basis, to address needs during the pandemic, while also working on a long-term recruitment and retention strategy that improves quality and maintains or enhances existing qualifications.

## **Registry of Non-Licensed Providers**

OMSSA members request additional clarification on the intent of the proposed registry of non-licensed providers. While it is important to track non-licensed child care providers, making the registry public could encourage parents to seek out options motivated by cost. This could have negative implications for program quality and the health and safety of children. OMSSA believes the Province should provide incentives to encourage non-licensed providers to become licensed.



CMSMs and DSSABs also support working with the Province to promote the value of licensed child care, so parents can make a fully informed choice for their child.

### **Funding and Administration Burdens**

OMSSA and its members encourage the Ministry of Education to reconsider previously announced changes to administrative funding and cost-sharing as we recover from COVID-19 and look to sustain, reopen and expand the child care system in Ontario. Allocations and capital expansion funds should be maintained. Community-based capital funds are also needed, as further capacity is required to address growing demands for licensed child care. OMSSA suggests that the Province consider efforts to increase funding simplicity and flexibility, by streamlining child care and early years funding into a single envelope.

### **Partnership with the Province**

OMSSA and Ontario's Service System Managers are ready and able to work in partnership with the Province to lend our expertise and experience on designing and implementing Ontario's new child care plan, and to work with the federal government to implement a national child care plan with universal access across Canada. OMSSA also values our relationship with the Association of Municipalities of Ontario (AMO) and fully supports their submission on the proposed regulatory amendments.

We appreciate the ongoing engagement and consultation with the Ministry of Education and look forward to building on the gains achieved over the last five years resulting from the Child Care and Early Years Act. Thank you for the opportunity to provide consultation on the proposed regulatory amendments and ongoing issues in the early years and child care sector.

Sincerely,

**Doug Ball**  
**Executive Director**  
OMSSA

**Dan McCormick**  
**President**  
OMSSA