

## OPEN LETTER TO ONTARIO EDUCATION MINISTER THE HONOURABLE LIZ SANDALS

February 5, 2014

Dear Minister Sandals:

We are writing to communicate our concerns about the changes proposed to Ontario's child care regulations. Specifically, we are concerned about the proposed reductions to adult: child ratios and increase in group sizes achieved by altering age groupings. We believe that these proposals are inconsistent with the Modernization paper's Guiding Principle: "**Commitment to quality programs for all children. Program quality must be a priority across service settings**" and not in the best interests of children—or, indeed, any of us.

The response to your government's Bill 143 has been quite positive. The early childhood community and the broader child care movement have been enthusiastic about its proposals to limit unregulated child care and to most of the other changes it contains.

However, we are concerned about the separated process of the proposed regulation changes. Research shows that the proposed ratios/group size regulations for the youngest children (1 – 2 years) are below even minimum recommended quality standards. This means that the most vulnerable children—for whom ratios and group sizes make the most difference—would be cared for by too few adults in too-large groups. We also believe that the number of young children proposed for regulated family child care —six two year olds in a private home with one caregiver—to be too high to constitute "quality" or even safety.

Staff and provider educational preparation requirements are strikingly absent from the proposals, which again contradict the Ontario government's commitment to the Guiding Principle of high quality. Research clearly indicates the strong links between professionally educated staff or training for home child care providers and high quality. The current proposals will actually work to reduce the proportion of professional staff working in programs serving the youngest children.

The child care workforce, earning low wages and benefits, is already struggling in an environment offering little support. Research has shown the negative impact of poorer ratios and group sizes on staff morale, retention, working conditions and interactions with young children—factors that are at the heart of any quality child care program. A further decrease in working conditions will exacerbate service providers' ongoing challenge to recruit and retain professionally educated early childhood educators in child care programs for younger children.

Further, the proposals fail to consider other key issues that would be negatively impacted by poorer ratios and group sizes. These include the inclusion of children with special needs and provision of high quality care for children and families in need of extra support, such as newcomers to Canada and low income families with limited resources.

One of our overarching concerns is the absence of a holistic approach to policy development, which we had hoped was signaled by the Modernization paper and the substantial new legislation. We suggest that changes to ratios and group size must be considered within the context of other policy elements — early childhood training, pedagogy, facility considerations, safety and financing—that is, within a full policy process with a goal of real transformation.

Ratios and group sizes have not changed in Ontario since 1983. At that time, there was a full consultation process including significant review and presentation of research, data and fact-gathering, dialogue and debate between Ministry officials and the child care community. We believe that to do justice to this important issue, a similarly

robust process of reflection and consultation that is more than a one-way response to the proposed regulation changes is warranted.

Minister Sandals, we urge you to take more time to engage in a fuller consultation and policy development process. We will work with you to ensure the passage of Bill 143 and engage with you in a full policy process. We believe that this needs to include not only alternatives to the significant ratio reductions and group size increases now proposed but other key policy elements that will “build [the] comprehensive early learning and care system, including the successful extension of full-day kindergarten and child care” committed to by Premier Wynne in her Throne Speech last year. Only thus will child care be transformed into the accessible high quality early learning program envisioned in your ministry’s Modernization paper that can come to benefit all children and families in Ontario.

Thus, we the undersigned organizations, early childhood leaders, and child care service providers urge you to initiate without further delay a full policy process that may include regulation changes.

Thank you.

Organizations

Service providers

Early childhood leaders