

February 28, 2014

c/o Early Years Division
Ministry of Education
900 Bay Street, 24th Floor Mowat Block
Toronto, ON
M7A 1L2



Regulation 262 – proposed changes February 2014

A response from Andrew Fleck Child Care Services

It is with great enthusiasm that we submit the following comments, on behalf of the Board of Directors and Staff of Andrew Fleck Child Care Services, in response to the proposed changes to regulation 262. As we did with 2012 Modernizing Child Care in Ontario: Sharing Conversations opportunity, we are submitting another carefully thought out, detailed response with recommendations. We collaborated on the response being submitted by the Home Child Care Association of Ontario, therefore we have not commented on the proposed recommendations for that sector in this response.

While we respect that the purpose of the proposed regulation changes, we wish to confirm our endorsement of Bill 143; the modernized legislative framework is necessary to successfully modernize the early learning and care sector. Changing regulation 262 will not accomplish the transformation that Ontario's families need.

We have provided our feedback and recommendations under the three priority areas: **program quality**; **access and flexibility**; and **health and safety**. We developed our recommendations from the perspective of an experienced operator committed to high quality services for children and families. We believe that our recommendations will stabilize and transform the early learning and care system to enable higher-quality consistent services.

To ensure understanding of our recommendations we have, where appropriate, inserted changes in wording directly in the proposed amendments. In some sections we have identified our comments immediately following the proposed amendment.

PROGRAM QUALITY SECTION

Our suggestions for changes to the wording in the proposed amendment:

The policy statement would also be accompanied by proposed complementary regulatory amendments that would further support the use of the ELECT/Early Learning Framework principles across the early years sector. Among others, these complementary amendments may include:

- Replacing the requirement in Regulation 262 to have a program of activities with a requirement to implement a program that focuses on positive, responsive interactions; incorporates active exploration, play and inquiry; provides engaging materials/environments; and supports development in a holistic manner.
- Replacing the requirement in Regulation 262 to have a posted daily program plan with a requirement to communicate with parents on a regular and ongoing basis, about what their children are experiencing related to active exploration, play and inquiry both indoors and outdoors. The RECE must maintain documentation identifying how and when they have communicated with parents.
- Simplifying the requirements for outdoor play (maintaining a minimum requirement) and providing more flexibility related to rest time to enable educators to use professional discretion to be responsive to the children in their care, and to support children's developing ability to self-regulate.

AFCCS recommendation: The above regulation changes must also include a minimum number of paid non-contact hours for all RECEs responsible for programming and communication with parents otherwise the expectations become the sole responsibility of the RECE.

ACCESS and FLEXIBILITY

We are in agreement that increased access to licensed spaces for families is necessary and that this can be accomplished with increased flexibility, but the proposed age groups, ratios or group sizes must promote quality experiences for all children. We applaud the concept of regulatory flexibility, but the purpose behind that flexibility must be tied to supporting children and their development. We also recognize that increasing access to licensed spaces is a priority, but this should not be accomplished by simply increasing the ratios and group sizes. Higher ratios will adversely affect successful integration of children with special needs in licensed programs and may even limit opportunities.

Therefore please see the chart below with specific recommendations from AFCCS regarding ratios, group sizes and staff qualifications as the minimum standards: *(we felt it was easier to compare our recommendations to the current regulations and the proposed changes by presenting the information in a chart - 2014 refers to the ratios being proposed in the revised regulation)*

	INFANTS				TODDLERS			
	ages	ratio	RECE	grp size	ages	ratio	RECE	grp size
Current	0-18 months	1:03	1	10	18-30 mths	1:05	1	15
2014	0-12 months	1:03	1	10	12-24 mnts	1:05	1	15
AFCCS	0-12 months	1:03	3	10	12-24 mnts	1:04	3	12

	PRESCHOOL			
	ages	ratio	RECE	grp size
Current	30 - 60 months	1:08	1	16
2014	24-48 months	1:08	2	24
AFCCS	24 to 46 months	1:07	3	21
AFCCS	24 - 36 months	1:06	3	18
AFCCS	30 - 46 months	1:08	3	24

	JK/SK				SK			
	ages	ratio	RECE	grp size	ages	ratio	RECE	grp size
Current	44 - 67 mths	1:10	1	20	56-67 mths	1:12	1	24
2010	36-55 mths	1:10	1	20	44-79 months	1:13	1	26
2014	4 - 5 years	1:13	1	26	4 - 5 years	1:13	1	26
AFCCS	JK	1:10	3	30*	SK	1:12	3	30*
AFCCS	JK/SK	1:11	3	30*				

	SCHOOL AGE			
	ages	ratio	RECE	grp size
Current	68 mths to 12 yrs	1:15	1	30
2014	6 to 8 yrs	1:15	1	30
2014	9 to 12 yrs	1:20	1	20
AFCCS	6 - 8 years	1:14	1	28*
AFCCS	9 - 12 years	1:18	1	32*
AFCCS	6-12 years	1:15	1	30*

**with the understanding that the size of program room is increased proportionately to ensure adequate space for a play based program.*

We have identified that we believe that all staff to meet ratios must be RECE. It would not be acceptable in other sectors (e.g. elementary schools) to reduce the required number of qualified professionals as a cost-saving measure; we should have the same expectations of high standards for our youngest citizens. The current “otherwise” approved process can be utilized when necessary if recruitment of a RECE is not possible.

We also believe that these proposed regulations provide an opportunity to review the required space per child. It is our experience that the minimum amount of space outlined in the current regulations is not suitable, particularly for younger children. Ensuring that children have adequate physical space to engage in a variety of types of play, maintain and return to projects, and access a quiet space in which to reflect, is key in supporting children to develop self-regulation. While we understand that there will be a need to grandfather existing spaces, we should utilize this opportunity to set expectations based on what is best for children’s development.

We recommend that agencies can apply for a license with ranges, allowing the centre to easily and effectively adapt to the changing needs of their community without having to re-license their space for a minor change. For example, one of the program rooms can be licensed for a group of 12 children (12 months to 2 years) with 3 educators or 15 toddlers (18 months to 2.6 years) with 3 Educators or 18 children (2 -3.6 years) with 3 educators. Throughout a calendar year, depending on enrolment and the children’s needs the program will adjust.

We also recommend that each age group, not just one per site, be allowed to enroll up to 20% of younger children.

With this in mind the intention behind multi-age grouping can be accomplished while retaining quality.

We propose the following ratios and staff qualifications as minimum standards for multi-age groupings:

ages	ratio	RECE	non-ECE	grp size	restrictions
24 - 36 mths	1:06	2	0	18	
2 - 3.8 yrs	1:07	3	0	21	8 ch older than 36mths

ages	ratio	RECE	non-ECE	grp size	comments
JK/SK	1:11	3	0	30	grp size reduces ratio

ages	ratio	RECE	non-ECE	grp size	comments
6 - 8 years	1:14	3	0	28	

We believe that all programs providing group care need to be licensed, including programs delivered by school boards and/or CMSMs. Allowing some operators to not be governed by the same legislative expectations is confusing for families and creates unfair, inappropriate differences. The differences are affecting the viability and stability of licensed programs. Expecting all programs to be licensed supports the inclusion of children with special needs and the support for parents through special needs resourcing.

Proposed Amendment for Staff Qualifications:

AFCCS recommendation: A summary of qualifications identifying why the person is suitable for the position must be maintained for each non-ECE person hired if they have direct contact and responsibility for a group of children within ratios. In addition, these individuals must be supported by a coaching/mentoring plan that includes specific professional development with minimum hours and identified topics.

In conclusion, we believe our recommendations are reasonable, supportive and necessary to ensure that all early learning and care that is offered in Ontario meets minimum quality standards.

Sincerely,



Executive Director

Description of Andrew Fleck Child Care Services

Andrew Fleck Child Care Services (AFCCS) is one of the oldest and most diversified non-profit, charitable, multi-service early learning, child care and family support organizations in Ontario. It began its operation in 1911 and was incorporated as a charitable organization in 1920 under the legal name of The Ottawa Day Nursery Inc. It later changed its name to Andrew Fleck Child Care Services in recognition of its benefactor Mrs. Andrew Fleck who donated the building at 195 George Street to the organization in 1932.

AFCCS has always taken a leadership role in the child care community and in early childhood education. Over the past 100 years, in response to the changing needs of the community, it has developed innovative programs and expanded the organization to provide a comprehensive range of services that meet the diverse early learning and child care needs of families in the City of Ottawa. AFCCS takes pride in being innovative, progressive, responsive and - most importantly - committed to excellence in all its services.

AFCCS benefits from sound management practices, a secure financial base and an efficient infrastructure. It also keeps pace with the latest developments in the early childhood education field and information technology to support the delivery of high quality, client- and child-focused services. In addition, it has proven expertise in successfully piloting demonstration projects.

AFCCS advocates for high quality, affordable, accessible, accountable and inclusive child care that promotes the optimum physical, emotional, social, cognitive and intellectual development of the child. AFCCS believes in a holistic and family-centred approach to child care – one that offers a continuum of easily accessible child care options to meet the varying and changing needs of parents and children.

We are a comprehensive multi-service organization. In 2011 we provided care and services for 7,407 children and 52,208.

*We currently provide **Licensed Group Care** for children from 18 months to 12 years in 4 locations. We have been providing child care to the families of Lower town since 1911. Our purposely built building at 195 George St was constructed in 1932. We opened a second location at 185 George St in the 70's, that building was torn down and a new building opened on the same site in 2008. We also operate three kindergarten/school age programs. Two of our sites are located in schools that offer full day kindergarten. We have entered into a third party agreement with the Ottawa Carleton District School Board (OCDSB) to offer the extended day program at those sites. Our third*

program is also in an OCDSB school, it is purposely built space and we contributed to the capital cost of constructing that site.

Licensed Home Child Care (HCC) has been offered by Andrew Fleck Child Care Services since 1969. Today, approximately 550 children aged three months to ten years are cared for by dedicated Child Care Providers in nurturing, inclusive, supportive and stimulating home environments. Professional staff visit the homes regularly to provide support, consultation and educational opportunities and also to ensure that the highest standards of health, safety, nutrition and child development are met

The Ontario Early Years Centre (OEYC) – Ottawa South is a place for children aged 0-6, their parents and caregivers to take part in programs and activities together. Parents and caregivers can also get information about services available to them in the community, learn about their children's development and get answers to their questions. At the Ontario Early Years Centre our focus is on helping families give their young children the best start in life. Services are available in English and French.

We also offer four City wide services:

Child Care Information (CCI) is a bilingual, publicly funded information and referral service on early learning and child care. The purpose of Child Care Information is to provide guidance and information on all available child care options in Ottawa. Bilingual staff are available by phone or in person to help parents make informed child care choices. Comprehensive child care and nursery school directories as well as other helpful publications are available for sale. Child Care Information also manages the Centralized Waiting List for all the licensed child care centres and home child care programs in the City of Ottawa.

Children's Integration Support Services (CISS), a resource teacher program of Andrew Fleck Child Care Services, is a bilingual program which provides support services and capacity building to licensed nursery schools, day care centres, school age and home child care programs that integrate children who have special needs between the ages of six weeks and ten years of age in the City of Ottawa.

Thursday's Child Nursery School (TCNS) is a licensed center-based program that operates eleven months of the year for nine children aged two to five who are diagnosed with Autism Spectrum Disorder.

Short Term Child Care provides peace of mind for working parents. This bilingual program was initiated in 1987 to provide reliable, accessible back up care for children 3 months to 12 years when the child is mildly ill, when regular child care arrangements are interrupted, or when other family emergencies arise. Employers/organizations/unions pay an annual access fee that entitles their employees/members access to the Short Term Child Care Program. Parents who use the services are charged a reasonable user fee, which may be subsidized partially or fully by their employer/union.

More information about Andrew Fleck Child Care Services can be found at www.afchildcare.on.ca

Child Care Information
Information sur la garde des petits
Children's Integration Support Services
Services d'intégration pour jeunes enfants

Home Child Care
Short Term Child Care
Programme de garde d'enfants à court terme
Child Care Consulting Services

Group Day Care Centre
School Age Program • Summer Day Camp
Early Years Centre
Centre de la petite enfance
Thursday's Child Nursery School

600-700 av. Industrial Ave., Ottawa, ON K1G0Y9 • Tel/Tél 613 736-5355 • Fax/Télé 613 736-8378

www.afchildcare.on.ca