



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

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To: The Standing Committee on Social Policy

OPSBA Submission to *Bill 10, Child Care Modernization Act, 2014*

The Ontario Public School Boards' Association (OPSBA) appreciates the opportunity to respond to this proposed legislation that primarily focuses on improving the oversight of the child care sector but also includes changes to other acts, including amendments to the *Education Act*.

We have been following the contents of this bill from the time it was originally introduced last December. Since then, we have had ongoing consultations with the Early Learning Leads within our member boards and had regular discussions within our Association through our Policy Development Work Team, Executive Council and Board of Directors. Due to the scope of this legislation, we have also connected with stakeholders in the child care sector. We will address some of the possible changes in the other acts but our focus is on the amendments proposed with regard to the *Education Act*.

It must be stated again that OPSBA and our member boards continue to be profoundly attuned to the changes that have affected both school boards and the child care sector since the introduction of Full Day Kindergarten. We have provided comments and feedback to several discussion papers concerning both sectors and will continue to advocate on behalf of our member boards for changes that promote the high quality of public education in our schools and stabilize the child care community.

Please find below our comments for the Acts being considered.

Schedule 1 -- Child Care and Early Years Act, 2014 and Schedule 2 -- Repeal of Day Nurseries Act

This includes the introduction of a brand new piece of governing legislation for the child care sector and we are supportive of changes that will modernize child care in Ontario. It is our understanding that proposed changes concerning child/staff ratios may be put forward through regulation consultation among the sectors. This is a necessary step to adequately address changes that have been viewed as contentious and have attracted an extensive amount of controversial commentary. As employers, we want to ensure that quality of care in schools and child care centres is not compromised. The new Act also provides for the involvement of school boards in the consultation of a "child care and early years program and services plan" developed by regional service systems managers. This inclusion demonstrates the importance of partnerships across the sectors and will bring more stability and planning of services in our communities. We are also supportive of the extension of the Ontario Education Number (OEN) to the child care sector as we believe this will support educators and parents in following a child's progress and ensuring appropriate supports and interventions are initiated.

Schedule 3 -- Amendments to the *Early Childhood Educators Act, 2007*

OPSBA is supportive of changes that acknowledge the professionalism and accountability of early childhood educators, and that provide standards of care across the province. We believe that the ECEs in our FDK classrooms and in other centres are professionals and should have a similar level of accountability as other educators. We also support the College in its goals for professional development for its members. We note that the legislation also suggests new requirements for mutual information sharing among the College and employers, which would include school boards, and this would also be supported.

Schedule 4 -- Amendments to the *Education Act*

It is our understanding that there are two main suggested changes. The first would require school boards to ensure before and/or after school programs are available to students 6-12 years of age. This could be provided by boards directly or by a third party provider. As in the case of FDK before/after programming, OPSBA maintains that boards need the flexibility to make local decisions that make sense for their communities.

We informally surveyed our member boards about their readiness for this suggested extension in before/after school programming. Some boards would be ready and able to begin sooner than others. Currently, many school boards are working successfully with their community partners and we have other boards that are operating their own programs equally well.

Regarding board delivered programs, our initial questions include:

- What is the viability threshold?
- Will these also follow a cost recovery model?
- Will on-site locations be given preference?
- What staff would be considered qualified to deliver the programming?
- Will there be subsidies for families in need?

Regarding third party delivered programs:

- Will there be a preference for not-for-profit groups?
- Will transportation and its associated costs be considered?
- How would safety concerns be addressed for off-site locations?
- What staff would be considered qualified to deliver the programming?
- Would criminal reference checks be required?
- Will there be subsidies for families in need?
- What shared spaces or other rooms could partners use?
- How will special needs funding be delivered?

Regardless of who delivers the programming, there are also many questions concerning the content and operations (days and hours etc.). We would again want to support local board decisions based on the needs of their communities. We know that children in this age range have varied interests and we would want to encourage a balance between sports, arts, leadership as well as time for tutoring or studies and possibly homework.

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The second proposed change would allow the ministry to regulate accommodation fees charged by boards to third party providers located in schools. We did inquire about this proposed regulation with our member boards and there were varied responses as to what could actually be included in a regulation for shared space. Components that were discussed when determining costs included square footage used, number of children, as well as custodial, maintenance and utility costs.

As noted above, there are many questions that we assume will be discussed in more detail and with the necessary in-depth consultation required to promote successful implementation in the sector.

Schedule 5 -- Amendments to the *Ministry of Training, Colleges and Universities Act*

We are supportive of allowing the sharing of data between the Ministry of Education and TCU for the purposes of tracking and measuring student performance.

Although not part of this particular legislation but still connected, we would like to inquire about the status of the earlier consultation regarding Regulation 262 under the *Day Nurseries Act*. We realize with Bill 10 moving to passage that many of these issues included in that consultation may be delayed but we are still seeking movement to close the gaps between the two pieces of legislation.

Also, as advocate for our member boards, we intend to share some of the issues that continue to resonate. This includes the ongoing need for joint professional development to support the ECE/Teacher relationship, resolution of the continued salary discrepancies between ECEs and teachers and increased numbers of children who are identified as having special needs.

And finally, we would note our support for the concept of community hubs as contemplated in the Premier's mandate letter to the Ministry of Education. School spaces are a natural fit for many community partnerships including those that support the early years.

As the province develops legislation and policy in this area, we are cognizant of the dialogue at the federal level and, in particular, 2015 election promises for the child care sector and will follow the potential impact for Ontario with interest.

Sincerely,



Michael Barrett,
President of the Ontario Public School Boards' Association

The Ontario Public School Boards' Association (OPSBA) represents public district school boards and public school authorities across Ontario. Together our members serve the educational needs of almost 70% of Ontario's elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for all students regardless of their ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality, or religious affiliation.