



**ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION**

**Leading Education's Advocates**

**Ontario Public School Boards' Association**

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The Ontario Public School Boards' Association (OPSBA) appreciates the opportunity to respond to the Ministry of Education's Discussion Paper, *Modernizing Child Care in Ontario*.

With the introduction of Full Day Kindergarten in 2010, our members have become increasingly attuned to the issues affecting child care and to the ways in which the K-12 education sector and the child care sector intersect. While our advocacy work in the past has focussed primarily on school age children, we include in our concerns the future not only of those child care providers currently located in our schools but also of the child care community in general. We continue to urge the Ontario government to pursue funding solutions that will maintain stability of the child care community, ensure that enough licensed spaces are available (including subsidized spaces), and pave the way to universally accessible child care for children and families.

With the responsibility of child care moving to the Ministry of Education, we see child care as part of the education continuum and as such, we welcome any discussion that supports and promotes strong working partnerships among child care providers and schools.

OPSBA has a strong record of promoting the fundamental importance of early learning and urging recognition that investing in our youngest children in the early years represents the most far-reaching and responsible investment we can make in Ontario's future. It's very clear that school boards have a part to play in this discussion. Many child care programs are located in our school facilities and have had long standing positive relationships with principals and school staff. Even child care programs located off school property have had connections with local schools as they serve the same families.

In this submission we wish to share comments received from our member boards. We feel it is important to mention that this discussion paper was released at the end of June (after school ended for the year) and the current discussion regarding labour relations has provided much distraction in the sector during this consultation period. The timing and the prevailing circumstances may have worked against the emergence of a full and detailed response from our sector. We would request that the ministry consider comments well past the September 24<sup>th</sup> deadline.

The Ministry of Education's *Modernizing Childcare in Ontario* Discussion Paper has 5 key areas for action over the next 3 years. We have provided comments for each action area. We have also provided more detailed thoughts for the specific questions under the Capital Funding Priorities item which ties in with the recently announced Schools First Child Care Capital Retrofit Policy.

## 1. Operating Funding Formula

OPSBA understands that the current formula is outdated and extremely complicated. We would be supportive of any change that increases the transparency of funding lines and streamlines services, including more efficient allocations to First Nations communities. We understand that First Nations communities and their community organizations will respond directly on issues that are critical for them. We strongly believe that funding should continue to include subsidies to ensure that child care is affordable for parents of all students.

Member boards have told us that the waiting list for child care subsidies needs to be reviewed and analyzed. Some parents are never able to receive a subsidy because the wait is so long. This would also apply to FDK's extended day programming. Some of the neediest schools, including priority schools, will not be able to support an extended day program because parents cannot access the subsidy that will allow their child to participate. These schools are often a reflection of their community and it is these families (and their children) that can benefit the most but are held back by socio economic factors. Without enough children, the extended day program becomes unviable for many schools.

It has also been suggested that per pupil allotments, demographics, and additional funds for special needs students (aligned with Ministry of Education policies on special education funding) etc. should all be included in developing a new funding formula. The model could be similar to the funding model for school boards.

It was also pointed out that access to Special Education Allocation equipment funding needs to be coordinated with education funding (as opposed to having two or three different sources of funding for equipment etc. for parents/children). This would avoid duplication of funding and resources and provide a smoother process for parents.

Finally, we suggest that the funding formula discussion could include the consideration of a funding line specifically for occupancy costs – the amount that school boards charge child care providers for space. This could help create consistency for school boards who have childcare centres in their schools. The costs should be reasonable, competitive and be set up for cost-recovery.

## 2. Capital Funding Priorities

OPSBA is supportive of the schools-first child care approach but it must be made clear that this will require boards to have thorough analysis and thoughtful consideration when determining future space requirements and long term implications. Most boards have these conversations already as part of their mandated accommodation review process and school board staff also meet regularly with their municipal partners. We do believe that schools with child care centres will have to have a holistic approach to planning that includes all partners in the school. We note that school culture and the involvement of knowledgeable staff have an influence on the level of communication and cooperation.

*How can the Ministry of Education facilitate collaboration and joint planning among school boards, service system managers and child care operators so they can plan and manage this approach?*

Some of the considerations school boards and OPSBA have been seeking include:

- Facilitation regarding municipal approvals – both process and timing. There is an identified need for more dialogue between the Ministry of Education and the Ministry of Municipal Affairs on the timeliness of responses/approvals to reasonable board requests. Putting in place child care facilities is a benefit for the community as a whole and school boards should be exempt from any local municipal charges related to the approval process.

- Consideration of school board planning time, meeting schedules and approval process. Over the past number of years, the funding for Board administration has been reduced. Given the many hours and resources that are needed for the implementation of child care and other such policies, it will be important to structure efficient processes that take this into account.
- Harmonization of regulations between the *Day Nurseries Act* and *Education Act* with respect to future capital projects. This is necessary and makes practical, economical sense. Different rules add to more costs over time.

*What supporting policies are required to ensure the success of a schools-first child care policy (e.g., long-term planning on space for school-based operators, reasonable accommodation costs, facilities, and other shared space issues)?*

As discussed above, a topic for further discussion could include a funding formula change that allows board to charge for spaces. Occupancy costs need to be reasonable and competitive. One approach could be a standard flat fee could be charged for rental space (most schools absorb the heating/lighting costs).

It has also been suggested that “transition” areas be more accommodating (parent and child-friendly) to both child care and school users. These would include drop off and pick up zones and should also apply to any shared space used by both groups. We do note that this again is fostered by a good working relationship between the childcare provider and school staff.

*Where school-based space does not meet community needs, are there additional capital tools that could support community-based child care operators?*

In developing solutions, it is important to understand and recognize the reality of accommodation pressures on boards. One size does not fit all. It is an inescapable fact that space may not be available in a school. A further practical issue is the need to recognize the true costs of retrofitting for a younger age group in the child care sector.

It would be helpful if the government aligned school board capital planning with child care needs when the child care is located inside a school. Alignment of capital planning would provide more opportunities to expand within schools. There may be a need to fund school additions in areas where accommodation is limited. Aligning all policies and sources of funding – i.e. capital priorities funding for school boards, minor capital and capacity building funding provided to CSSMs at the municipal level, would be more efficient and create better synergy.

One member board said, “*there is a current gap where there is not capital funding to address municipal daycares relocating into new school construction. It would be more cost effective in both planning and construction phases to fund that collaboration up front, rather than fund some level of an addition after a new school is already either under construction or already built.*”

Finally it is important to underscore that, with a schools first policy, there also comes the added, often unseen, costs of facility management, maintenance, possibly extended hours for caretaking staff, need for extended parking (this incurs the cost of creating additional spaces) and costs related to meeting the fire and safety demands highlighted in the *Day Nurseries Act*. All of these costs must be realistically reflected in grants to school boards.

### 3. Quality Programs

OPSBA is supportive of a province-wide approach for program quality for all child care centres. The suggestion to have mandatory provincial guidelines for child care operators will mean a more consistent approach for learning and will provide parents with much needed answers about what they can expect their child to learn and experience while in care. We would very much endorse any programming that connects childcare to FDK and extended day programming and that reflects Ontario's Full-Day Early Learning-Kindergarten Program Curriculum. OPSBA's First Nation trustees have had input into that draft curriculum to ensure inclusion of First Nation, Métis and Inuit perspectives.

The challenge in ensuring quality in the child care community will be how this is implemented (or not) with those children in non-licensed care.

Quality programming is also dependent on quality staff. This leads to an entire discussion around pay equity among the ECE community. We are aware of the higher rates at which ECEs are paid at school boards, due to previous labour agreements and recent benchmarks established under Provincial Agreements (PDTs).

Some additional considerations on quality program elements include:

- Providing timely pre-service training for both ECEs and teachers; ensure that all training institutions focus on a developmentally appropriate commitment to play-based and inquiry-based learning.
- Offering standard and regular professional development for providers and teachers in child care and early learning classrooms (together), especially if there are going to be mandatory program guidelines for child care operators.
- Providing additional on-line resources for parents to help them understand the focus of the curriculum.
- Expanding on-line information for parents as to how each child care centre is monitored.
- Providing more education for parents about what "quality childcare" looks like.
- Providing all information that is available to parents in multiple languages.
- Allowing for flexibility to recognize the demographics of each community.
- Providing additional funding to day cares and schools to put diverse and inclusive resources into classrooms and child care settings that are responsive to the needs of children.
- Providing a handbook for parents on successful transition.

With regard to students with special needs, school boards are agreed that staff in child care settings need additional training. All child care operators should be experienced in dealing with a range of student needs. One of our member boards stated the following:

*"Often behaviour management support is required from school staff in before and after settings because there is only one person in the room and they are inexperienced. This is over and above safe schools issues. A common framework of assistance to students should be developed. If they have Educational Assistant support during the school day, they should have extra support in the child care setting - automatic. The comments in the discussion paper are applicable: The elements that should be considered in this review should include eligibility criteria, program expectations, administration, scope of practice and qualifications for resource consultants, and support related to the transition to school."*

Finally, if the licensing process is going to be connected to quality programs, what tool will be developed for consistency of evaluation, and can this be shared with schools?

#### 4. Modernized legislative and Regulatory Framework

OPSBA has previously commented on the need for harmonization of various policies between the Day Nurseries Act (DNA) and the Education Act. In an earlier submission regarding a regulation for third party providers we stated,

*“In order to ensure consistency and better alignment in the requirements for third party operators, we request the Ministry of Education continue its review of the differences between the Day Nurseries Act and Education Act with respect to Fire Regulations, Space Requirements, Playground Standards, Nutrition Standards (PPM 150) and perhaps others. Requirements should not be different for children who go to a school from 9:00 am to 3:00 pm, than those who attend either before or after the regular school day.”*

There should not be differing rules applied for the same student (and her/his program). When students move from their regular day school classroom to another classroom being used for extended day program, or before-and-after program within the same school building, there should be consistency in the rules that operate in all settings.

This list of suggested changes should also include public health visits and any other unnecessary duplication that may be caused by having different requirements for children and providers (examples include: communicable disease reporting, number of windows, play equipment, water inspection requirements, space requirement for possible common use such as libraries, gymnasiums etc.) We ask that there be a fuller consultation about any proposed legislative changes.

One of the Liberal election campaign platforms was to provide on-site after school programs for children ages 6-12 (once FDK was implemented). We would be supportive of a new licensing category for older children that is more relevant to that age group and suggest that the government consult with the many providers of existing successful programs including the YMCA, Boys and Girls Clubs, municipal Parks and Recreation programs and others. Many of these groups are operating programs in our schools and have for quite some time. We would also suggest connecting with groups such as the Middle Childhood Matters Coalition who are specifically advocating for an “increase access to high quality out-of-school programs for all children ages 6–12.”

#### 5. Support for Accountability and Capacity-Building

One of the questions we believe warrants further discussion is whether children in licensed child care centres should be given an Ontario Education Number (OEN). From a school board perspective, this could help school boards with planning future class sizes, but more importantly, it could also help to flag issues or obstacles that may have an impact on a student’s success and well-being over time. A consistent approach would help meet student/parent needs and reinforce local multi-disciplinary co-operation early on in a child's life. We recognize that there is a significant amount of work involved in assigning and tracking OENs but feel that there are far-reaching benefits to children in taking this route.

In conclusion, we would like to stress that like schools, child care centres have their unique characteristics and a one size fits all approach will not work. There needs to be flexibility to support programs in rural, remote and northern communities, including French language and First Nations communities.

We place strong emphasis on supporting the needs of children who require special education services as they move between the childcare and school settings. Emphasis must also be placed on providing more supports for parents of children ages 0-3.8 that can help identify those with special needs earlier.

Everyone agrees that parents and guardians are looking for quality, affordable and accessible child care and it is our hope that this discussion paper leads the government closer to achieving this goal. We also agree that society needs to recognize the importance and value of a strong child care system. We look forward to continuing this discussion with the Ministry of Education and the other members of the Early Learning and Child Care Advisory Group.

Sincerely,

A handwritten signature in black ink, reading "Michael Barrett". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Michael Barrett  
OPSBA President

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.