



Honourable Kathleen Wynne  
Premier of Ontario  
Legislative Building  
Queen's Park  
Toronto ON M7A 1A1

April 13, 2016

Re: Proposed Regulatory changes under the Child Care and Early Years Act

Dear Premier Wynne,

On behalf of the Ontario Council of the Canadian Federation of University Women, I would like to express our concern about proposed regulatory changes under the Child care and Early Years Act.

Ontario Council CFUW recognizes and appreciates the leadership the provincial government has demonstrated in recent years with the integration of early learning and child care. We also commend the provincial government for the proposed increase in early childhood educators and the desire to increase access to child care.

However, Ontario Council CFUW does not support the regulatory changes to age ranges, ratios and group sizes. We urge the provincial government to withdraw these proposed changes.

*Proposed Phase 2 regulation changes to age ranges, ratios and group sizes*

Newly defined age ranges, ratios and group sizes would result in larger groups of younger children. How would these proposed measures ensure the protection and quality of care and experiences for the children? What rationale could justify the combinations proposed when expert opinion states otherwise.

These proposed changes are not evidence based. They are not in line with the recommended ratios of the Canadian Pediatric Association. The evidence suggests that increase in child/staff ratios will put children's health and well-being at risk.

<http://www.cps.ca/documents/position/child-care-centres-trends-behaviour-development>

In addition, the proposed changes do not appear to take into account the significant feedback from those working in the field and others with expertise in ECEC. Larger group sizes and increased number of children per staff will impact interactions and lead to deteriorating working conditions. This in turn will only add to the recruitment and retention issues.

Any changes to early childhood education and care needs to be based on the best evidence available as to what is most beneficial to children and families.

Affordable, accessible, quality child care is a goal yet to be achieved in Ontario. This goal continues to be in jeopardy with this proposal where promoting access is at the expense of quality.

In moving forward to achieve this goal, Ontario Council CFUW recommends that the provincial government create a comprehensive child care plan, government policies and processes based on evidence and system-wide planning with public funding for research, data collection, and operating and capital costs. We also urge the provincial government to work with the new federal government and the other provinces and territories to create a universal high quality, integrated Early Childhood and Child Care system which continues to be the ultimate goal.

CFUW Ontario Council is composed of 54 clubs within Ontario, comprised of members living in urban and rural areas across Ontario. We are non-partisan, nonsectarian, a voluntary, self-funded, non-governmental organization. Our members are active in public affairs, advocating on public education, justice, health and environmental issues as well as the status of women and human rights. Ontario Council is part of the Canadian Federation of University Women which is the largest affiliate of the International Federation of University Women.

Sincerely  
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cc Hon Minister Liz Sandals, Minister of Education