



**ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION**

Leading Education's Advocates

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**OPSBA Response to Ministry of Education's Draft
*Before-and-After School Programs Kindergarten – Grade 6
Policies and Guidelines for School Boards***

The Ontario Public School Boards' Association (OPSBA) would like to thank the Ministry of Education's Early Learning Division for hosting a dedicated one day session with the Early Learning Leads from our member boards in September to examine the implications of before-and-after (b/a) school programming for six to 12-year-olds. That session was well attended and generated much discussion among our board staff about this next milestone in education. We are grateful to have met with ministry staff and talked openly about implementation issues, both opportunities and challenges.

Our boards have been extremely supportive of the implementation of Full Day Kindergarten and the flexibility given for b/a school programming. Boards appreciated being able to consult with their communities and make local decisions that were right for children and their families. With this in mind and the government's promise of adding b/a for older children, OPSBA and member boards have been looking ahead as to what this extension of care might look like.

In Spring 2016, OPSBA responded to the consultation that considered Tier 2 regulations including this provision. We remain supportive of offering multiple options for b/a school care and recognize the role of other providers such as recreation programs and those funded by the Ministry of Tourism, Culture and Sport. Our members felt that the system needed to be flexible and respond to parents' needs by allowing them options that fit their children and family dynamics. We are also supportive of allowing non-ECE individuals to work in programs for older children ages nine to 12 who are at different developmental stages and have more varied interests. This would open the door for other educators/leaders to support children's learning.

We understand that some boards have responded directly to the Early Years Division and this response includes their feedback via their Early Learning Leads as well as OPSBA's Policy Development Work Team.

Draft Document: Before-and-After School Programs Kindergarten –
Grade 6 Policies and Guidelines for School Boards

This document is to be used by school boards as a guideline for their local processes. We agree that it should:

- Provide advice and set out expectations regarding consulting local partners to assess viability and demand;
- Set out requirements for board-operated and third party programs; and,
- Establish requirements with regard to sharing information with parents and reporting to the ministry.

Below are OPSBA's recommendations for consideration to ensure this is a practical and useful tool for school boards.

- The title refers to policies and guidelines for school boards. Is this not one policy and one guideline? We understand that the final document is not to be an official Policy/Program Memorandum (PPM), which is a directive rather a guideline. Therefore, we suggest there be clarification to separate the policy information (what is required by legislation and regulation) and that which is a guideline.
- The document is to provide requirements for both board-operated and third party programs. Should these then not all be under the same category as program providers and then sub-divided into the different types of providers?
- Based on the above, these sub-sections should contain similar (or as close as possible) information and follow the same format and subject order. (Why does the school board's section not have an opening statement piece, why does its programming content part not have the word "quality"?)
 - Provider overview
 - Quality Programming
 - Staffing Ratios and Maximum Group Size (this title is inconsistent)
 - Staff Qualifications and Supervision (this title is inconsistent)
 - Active Play
 - Optional Activities and Programs
 - Health and Safety Requirements (huge section under Authorized Rec program only)
 - Organizational Requirements (only under Authorized Rec program)
- The Licensed Child Care Centres section is quite short in comparison to the other two provider sections. It would be better to have more information about the key areas mentioned above so that it is an easy reference to contrast provider requirements.
- Section 7 - Third Party Programs: Linkages to The School Day. Under the Safe Schools section it refers to "section 28 of the regulation." Can the name of the regulation (and link) be given?
- Section 9 - Reporting to the Ministry. We suggest a template be provided for the affirmations to ensure consistency across the province.
- Include links to relevant sections of the legislation and regulation.
- Add a separate section for key dates and contact information.
- Add a checklist for boards with all the requirements (all the must/shalls).
- Include a statement about transportation not being provided/funded. This was part of the FDK b/a communications and should be made clear.
- Ensure consistency with formatting (i.e. all "Please note" sections in italics vs text box. There are other sections in the draft that have text boxes).

Other Comments and Questions Regarding the Implementation of BASP 6-12

The majority of our school boards have been working with their municipal counterparts for many years and have engaged in regular discussions about child care in their communities. This was showcased at the recent Provincial Education Event, *Partners in Dialogue*, Early Years Session, where a panel consisting of school board and municipal staff talked about the need for strong working relationships, agreement that one size does not fit all and that all partners need to take the time to develop sustainable programming.

Timelines:

- There is concern that some boards may not be fully prepared for September 2017. With guidelines to be released in early December 2016, school boards will be communicating with parents about demand for the following school year. Many boards will continue to survey their school communities and begin in February at the same time as kindergarten registration occurs. Even with surveys being collected in Spring, complete data is not always available until the end of April. Most parents need to know child care costs before this in order to make decisions.
- There is a difference in the timelines for this implementation compared with the requirements of municipal service plans. Boards are to have their b/a plans in place for September 2017 and CMSMs and DSSABs are to have approved service plans by January 2019. Part of the municipal service plan is to consult widely and this will most definitely include school boards. The plans are to be complemented by a ministry policy statement and guidelines to be released in early Winter 2017. The ministry should consider these conflicting timelines.
- The draft document indicates a date of October 15 for boards to share program data and affirmations for the upcoming school year. How will this work for September 2017? And, could this date be pushed until Spring when more complete data is available?
- Collection of fee information by all providers may be difficult to have posted by May. Some boards are suggesting posting a range of fees in May and providing final information as soon as they are able.
- Transition time/phased in approach may be needed by some boards.

Municipal/School Board Relationships:

- Potentially more challenges for a school board that has more than one municipality for regular consultation.
- Support for more ministry-led opportunities to collaborate and share information.

Viability and Quality Programming:

- Are boards and municipal partners to determine and agree to what "sufficient demand" is? This is a vague definition and survey responses do not always equate to the number of interested families.
- How are boards to include current providers in their consultative process?
- How is quality and compliance to be monitored? Who is responsible? This would be difficult for school boards.
- Is there flexibility in the three hour maximum for authorized recreation programs?

Off-site programming for older children (6-12):

- Concerns remain regarding safety, supervision, program consistency, transportation and the practical considerations for families with a child younger than six (and required to stay onsite) and an older sibling (who could possibly be in an off-site program).

Shared Space:

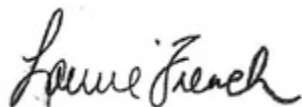
- Important to consider and use age-appropriate space (older children do not want to be in a kindergarten classroom).
- Need to consider school spaces used by extra-curricular programs that also provide children with benefits.
- Boards will need to account for additional costs due to extra caretaking, furniture and equipment upkeep.

Other:

- Smaller schools and those in rural communities still struggle with finding child care providers.
- Some programs need to be established first to grow. Viability may not be there for a few years.
- Qualified staffing continues to be a challenge for some communities.
- Lack of resources, including staff, for children with special needs.
- The number of families requiring child care subsidies remains. Additional subsidy funding is required.

Thank you again for this opportunity to provide comments on the draft document and we look forward to the ministry's responses to the questions we have posed. One of OPSBA's priorities is *The Whole Child and Student Well-Being* and our advocacy continues to include the seeking of high quality, affordable and accessible programs for children and their families.

Sincerely,



Laurie French
President

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.