



COLLEGE OF
EARLY CHILDHOOD
EDUCATORS

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ET DES ÉDUCATEURS
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April 30, 2010

Honourable Leona Dombrowsky
Minister of Education
Mowat Block
22nd Floor
900 Bay Street
Toronto ON M7A 1L2

Dear Minister:

Congratulations on the passage of Bill 242. This legislation is truly a milestone in the development of the ECE profession in Ontario and our 26,000 members no doubt are very pleased with this event. We are also very pleased with many of the amendments that were made at the Committee stage. There are amendments, however, that have raised some concern with our members.

First, as you are aware, the newly passed Bill will require Boards to designate an ECE position in a classroom to work directly with teachers in the delivery of the Early Learning Program. However, section 2.1 (iv) spells out "*circumstances in which a board is not required to designate a position in a junior kindergarten or kindergarten class as requiring an early childhood educator or to appoint an early childhood educator to such a position.*"

We understand from discussions with your office that this provision is required to deal with circumstances where there are small classes that do not warrant two professionals (a teacher and an RECE). We certainly accept the rationale for including this amendment in Bill 242; however, I am sure you can appreciate that without clear guidelines and a clear rule on the applicability of this section, then there will be an opportunity for abuse and misuse of this provision. The College would like to recommend that these "circumstances" be defined in the Regulations so that Boards have a very clear expectation from the Ministry on when they can utilize this exemption rule. Furthermore, we believe that this exemption should only be used in circumstances where there are a minimal number of children in a class that would warrant only one professional. Including these recommendations in the Regulations will ensure that the intent of the Bill is realized.

The second amendment that raises concerns with our members is related to section 16 whereby the duties of the teachers have been expanded. To the extent that the duties of the teacher include the management of the JK/SK classrooms which could be interpreted that teachers and ECEs are not equal partners. Further, the teacher's duties for the evaluation of the progress of pupils and the preparation of teaching plans may impair the ability of RECEs to perform the full extent of their duties and responsibilities. It is our view that the language in the regulation for Bill 242 needs to emphasize the teamwork required in each of the respective duties of teachers and RECEs . These changes will also ensure that the intent of Bill 242 to have a co-operative partnership between teachers and RECEs is achieved.

We look forward discussing these issues with you in detail, as part of our ongoing consultations on Bill 242.

Thank you again for your time in addressing this concern and we look forward to seeing you at our first Annual Meeting on May 3rd.

Sincerely,

A handwritten signature in cursive script that reads "Lois Mahon RECE". The signature is written in black ink and is positioned above the typed name and title.

Lois Mahon
President