

COLLEGE OF  
EARLY CHILDHOOD  
EDUCATORS

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ET DES ÉDUCATEURS  
DE LA PETITE ENFANCE

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March 3, 2010

Honourable Laurel Broten  
Minister of Children and Youth Services  
56 Wellesley Street West  
Suite 1400  
Toronto, ON M5S 2S3

Dear Minister:

We are writing to you today to address the “proposed regulatory amendments to the Day Nurseries Act (DNA).” We recognize that it may be necessary to amend this important piece of legislation to facilitate the smooth transition and rollout of the Early Learning Program (ELP); however, we have some concerns that the proposed changes may have an adverse impact on the quality and ability of RECEs to practice within the scope of practice as set out in the Early Childhood Educators Act .

We have reviewed the proposed regulatory amendments that we understand are designed to provide operators of day nurseries with “enhanced flexibility” to support their viability. As you are aware, the College currently has over 25,000 registrants, many of whom are employed within day nurseries across the province. The College of Early Childhood Educators ensures that these RECEs are trained to meet the developmental needs of the children in these settings. To the extent that RECEs are empowered to perform the full scope of their practice, they will continue to play an important role in these day nursery settings.

Additionally, the College is working towards finalizing the Standards of Practice and Code of Ethics for the profession. Some of the proposed regulatory amendments to the DNA may affect our members’ ability to meet those Standards of Practice, once they are adopted.

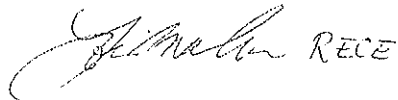
The College also has a fundamental duty to ensure that qualified and accountable RECEs are employed in all early learning environments. As such, the College may have concerns with any proposals that impact the quality of the learning experience for children as a result of an RECE’s inability to perform the full scope of their practice and to meet the Standards of Practice for the profession. The proposed regulatory amendments, in particular changes to staff ratios, may, in fact, impact the ability of the RECEs to perform their duties to their fullest. To the extent that these proposed changes impact the “quality” of any program and the ability of our members to meet the Standards of the Practice and fulfill the scope of practice, we have some concern.

Honourable Laurel Broten  
Page 2  
March 3, 2010

We look forward to further consultations on the proposed regulatory amendments to the Day Nurseries Act. We will continue to exercise our mandate to ensure that RECEs meet the ethical and professional standards set by the College so that day nurseries have confidence in hiring Registered Early Childhood Educators.

Thank you for continuing to consult broadly with all stakeholders as you prepare to roll out this new program. We look forward to seeing further details on the proposed regulatory amendments to the DNA.

Sincerely,

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

Lois Mahon  
President

cc Hon. Leona Dombrowsky, Minister of Education  
Julie Mathien, Director, Early Learning & Child Development Branch, MCYS