



Ontario Catholic School
Trustees' Association

P.O. Box 2064, Suite 1804
20 Eglinton Avenue West
Toronto, Ontario M4R 1K8
T. 416.932.9460 F. 416.932.9459
ocsta@ocsta.on.ca www.ocsta.on.ca

Patrick Daly, *President*
Beverley Eckensweiler, *Vice President*
Nick Milanetti, *Executive Director*

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Ms. Mary Lee
Senior Policy Advisor
Early Years Policy and Program Branch
Ministry of Education
24 floor, Mowat Block
900 Bay Street
Toronto ON M7A 1L2

Dear Ms. Lee:

**Re: Before and After School Programs Kindergarten to Grade 6
Draft Policies and Guidelines for School Boards**

The Ontario Catholic School Trustees' Association is the provincial voice for 237 elected Catholic Trustees who collectively represent 29 Catholic School Boards across Ontario. OCSTA sincerely appreciates the opportunity to comment on the "Before and After School Programs Kindergarten to Grade 6 Draft Policies and Guidelines for School Boards" ("draft guidelines") that has been the focus of regional consultations with school boards this fall.

In addition to the substantial feedback you have received from a number of our Catholic school boards at the regional meetings, OCSTA would like to offer some additional feedback to the draft guidelines.

First, OCSTA shares the Ministry's vision that before and after school programs for our students support a system of responsive, high quality, accessible and integrated early year's programs that contribute to healthy child development. The physical, intellectual, emotional and spiritual well-being of our students is the overriding priority of all of our school programs. In an effort to support this objective, our school boards have worked hard to establish agreements with municipalities and other third party child care providers to ensure they have the resources required to offer high quality before and after school programs in our schools.

However, there may be circumstances in which a school board cannot find a third party child care provider or other school board to offer the before and after school program. In this case, the program must be provided by the school board directly to families where there is sufficient demand. The costs of the before and after school programs are to be recovered fully from the parents of the students enrolled. But in some circumstances parents who are not eligible for a subsidy cannot afford to pay the fees and thus the school board must subsidize the operational costs of the program out of existing revenues. Even if, as the draft guidelines state, local service system managers have the flexibility to allocate child care and early years funding to best meet the needs of children and service providers within local communities, we believe that school boards may have to subsidize the costs of these programs in some instances.

Second, OCSTA has some general concerns related to the “authorized recreational/skill building programs” referred to in the draft guidelines. Although the guideline references “authorized recreation providers”, such as municipalities, YMCA, Boys and Girls Clubs of Canada and various programs funded by the Ministry of Tourism, Culture and Sport, it is not clear how these service providers will be regulated (unlike licensed child care providers). This potential shift to unlicensed recreational service providers may present school boards with additional challenges in respect of service planning and the necessary monitoring to ensure full compliance with existing Ministry of Education guidelines on the use of school resources and facilities.

A third concern relates to the guidelines approach to long-term and short-term planning. The guidelines seem to focus on the former but for school boards with existing programs, short-term planning is more relevant. This would include various marketing and communications strategies focused on families and addressing before and after school programs. In addition, rural and northern boards will have different planning needs and the guidelines need to ensure the requisite flexibility for local boards and service planners to develop processes that serve rural and northern boards’ requirements.

Fourth, we have some concern about the May 1 deadline for publicly posting the availability of before and after school programs. Many school boards struggle to provide accurate information about the availability of these programs by the current deadline of mid-May given most parents don’t register their children that far in advance of the next school year. This May 1 deadline may lead to programs not being offered.

We are pleased to note that the draft guidelines allow two or more school boards to enter into an agreement for one of the boards to directly operate or enter into an agreement with a third party to operate before and after school programs. A number of smaller boards have expressed some concern about their capacity to offer these valuable programs due to lack of demand.

Catholic schools boards across Ontario are working toward the full implementation of the Ministry’s before and after school programs as required by 2017. They are expanding the collaboration between school and child care staff, other third party service providers and local service system managers in order to develop high quality before and after school programs. The emotional, physical, intellectual and spiritual well-being of the students in our Catholic schools is paramount. Fully integrated before and after school programs within our schools will enhance this goal.

If you have any questions or concerns, please do not hesitate to contact me.

Yours Truly,



Patrick J. Daly
President

cc: Shannon Fuller, Assistant Deputy Minister (Acting)
Early Years Division