

**NOSDA Children's Services Working Group**  
**Regulatory Registry Posting re: Child Care and Early Years Act, 2014 Feedback**

**Licensing Clarity**

Primary Purpose of a Program

Clarity is needed with respect to programs who are exempt. For example: Would there be a time limit or frequency limit for pre-k programs?

Factors when defining child care should be included in guidelines/manual when it becomes available.

**Exempt Circumstances**

Providers Own Children

Clarity is needed with respect to the last sentence: Would the providers own children not be included in the ratio for full days during March Break, PD Days and Christmas holidays?

Enforcement

We recognize the need for enforcement tools to support compliance. We will be better positioned to offer feedback once the policies/tools are developed. We ask that the Ministry of Education be cognizant of the geography in the north when looking at developing enforcement teams.

**Licensing Standards**

Enhancing Quality

We understand the value of high quality programs and are pleased with the direction the Ministry of Education is taking to enhance program quality. We are looking for more detail with respect to adherence and would ask that the Ministry of Education develop tools to identify the standard and ensure that a strong statement is used to stress the importance of adherence for providers.

Increasing access to license before and after school programs

We are pleased with this regulation and think that it will support smaller communities and provide opportunities for siblings to spend time together within the mix.

Updating Licensed Home Child Care Requirements

We look forward to reviewing the ministry supports and resources to ensure the success of unannounced visits. It is important that standards are in place to support the work of the home visitor.

We anticipate that the resources and supports will be outlined in more detail in the guidelines.

Updating Health and Safety Standards

Health and Safety standards are critical in a high quality child care program, we are pleased that the Ministry of Education has recognized the need to enhance these standards. We fully support an increased emphasis on food, nutrition and positive meal time experiences.

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**Special Needs**

This regulation is reflective of current practice and does not limit needs to those identified through a formal diagnosis.

**Miscellaneous**

All of the miscellaneous regulations are good, we especially like the concept of branding/identifying licensed programs and the responsibility of unlicensed programs to disclose that they are not licensed. We recommend that Ministry of Education consider working with CMSM'S and DSSAB's to develop communication protocols to ensure all licensing concerns are shared with the CMSM or DSSAB in advance of the public notification. For example a phone call or email to the CMSM or DSSAB when a provisional license is about to be issued.