Submission to the Standing Committee on Social Policy
on Bill 242, Early Learning Plan

The Ontario Secondary School Teachers’ Federation is pleased to present its recommendations on Bill 242, Early Learning Plan.

OSSTF/FEESO is a trade union which represents 60,000 members across the Province of Ontario. The union works to protect our diverse membership which is represented in 140 bargaining units across the province. OSSTF/FEESO bargaining units represent both English and French members in public and separate elementary and secondary school workplaces, private schools and consortia, offering support services to school boards and universities.

OSSTF/FEESO supports the early learning strategy presented by Dr Charles Pascal. The team approach for junior and senior kindergarten students comprised of both a certified teacher and a qualified early childhood educator (ECE) is the most effective way to deliver this type of program. In this regard, OSSTF/FEESO is uniquely positioned as we currently represent teachers and a wide variety of educational workers across the province. Admittedly, we do not represent primary teachers, but we are both familiar and comfortable with cooperative and mutually beneficial working relationships between teachers and education workers.

OSSTF/FEESO represents education support staff currently working as early childhood educators. OSSTF/FEESO education assistant bargaining units also have a number of trained early childhood educators working as education assistants. Although there clearly are funding concerns, implementation challenges and growing pains with this type of program, OSSTF/FEESO is committed to participating and assisting in the implementation and the evolution of the Early Learning Plan.

OSSTF/FEESO believes that there are two key components for the success of the Early Learning Plan – the education team and the seamless day.
In the preamble of the bill it states:

*The full day learning program will require collaboration among teachers and early childhood educators to provide high quality and effective play-based education to support enhanced learning and cognitive, emotional and social development for children.*

Bill 242 suggests that both professionals are required to provide the desired enhanced program. OSSTF/FEESO wants to ensure that the use of the ELP team and the inclusion of an ECE as part of the team is not subject to a class size threshold. Early learning classes that may be smaller should not be robbed of the team approach for the program. OSSTF/FEESO recommends that in situations where in a location the numbers for JK and SK may be small, the board should be required to combine the JK and SK students (this model currently exists in some boards) to ensure that a teacher/ECE team is in place to provide the desired program.

Section 12.0.1 of the bill states, “designate at least one position in each junior kindergarten and kindergarten class in each school of the board as requiring an early childhood educator.”

Section 2.1 states, “an early childhood educator appointed to a position under paragraph 12.0.2 of subsection (1) shall be in addition to the teacher assigned or appointed to teach the junior kindergarten or kindergarten class.”

Both of these sections of the bill indicate the ELP program will not run on a teacher first and an ECE as an enhancement. Again, OSSTF/FEESO feels that the program loses both effectiveness and credibility if it is not run by the ELP team from the outset.

Regulations developed in support of Bill 242 must provide clear job descriptions for both the teacher in the ELP program and the designated early childhood educator. The description of the roles must have enough definition to ensure minimal overlap and to avoid territorial disagreements. The bill makes a clear distinction between the function of an ECE and a teacher. Namely, a teacher “teaches”, but an ECE “works” in an ECE position. The easiest example of this is seen in the proposed amendments to Section 11(1) of the Education Act paragraphs 29 and 29.1. Namely:

"(7) Paragraph 29 of subsection 11 (1) of the Act is repealed and the following substituted:

qualification to teach

29. prescribing specific qualifications and experience required for the purpose of qualifying a person to teach in specific areas or positions.

(8) Subsection 11 (1) of the Act is amended by adding the following paragraph: qualifications, designated early childhood educator"
29.1 prescribing specific qualifications and experience required for the purpose of qualifying a designated early childhood educator **to work** in specified areas or positions;” (emphasis added)

This definition may not on its own provide enough clarity on the duties performed by each member of the team. Certainly, the duties and roles will evolve over time and should be flexible enough to allow individual teams to create their individual strategies.

"264.1 (1) It is the duty of the following persons to co-ordinate the matters listed in subsection (2) and to co-operate with each other with respect to those matters:

1. Teachers

2. Temporary teachers

3. Designated early childhood educators

4. Persons who, under the authority of a letter of permission, are appointed by a board to positions designated by the board as requiring an early childhood educator

What will become relevant is how the College of Teachers and College of Early Childhood Educators define the professional obligations of their respective membership regarding the obligations and responsibilities arising from Section 264.1 of the proposed amendments. The concern that arises from the planned amendments is that one can, unfortunately, easily predict that at some stage in the future an unhappy teacher, teaching in junior kindergarten, kindergarten, or any extended day program, may file a complaint with the College of Early Childhood Educators that the ECE person they work with has been failing to meet their professional duties, by failing to co-operate with the teacher. No doubt the ECE person could then file a complaint at the College of Teachers making a similar claim.

OSSTF/FEESO recommends that Bill 242 should contain the provision which would have the effect of removing complaints about lack of co-ordination or co-operation from any of the respective colleges. The relationship between the teacher and ECE is critical to the success of the ELP. It is for this reason that the ECE should not report to the teacher, he or she should report directly to the principal. The early learning team must be a partnership to be effective.

In addition to the early learning team, OSSTF/FEESO believes that JK and SK students should have access to Professional Student Services Personnel (PSSP) such as Psychologists, Speech and Language Pathologists, Social Workers, Child and Youth Workers, and all other professionals, currently working in our schools, in order to facilitate early identification and assistance of these young students. Identified students must also be provided with Educational Assistants and other supports as required.
The bill is clear that the qualification necessary for working as the designated early childhood educator is membership in the College of Early Childhood Educators. Subsection 8 (1) of the Act is amended by adding a paragraph that allows for one year letters of permission to be granted to boards to hire ECEs that are not members of the college when there are no qualified ECEs available. OSSTF/FEESO is concerned that there are many trained and experienced ECEs working in school boards that may not be members of the college of Early Childhood Educators and may not easily gain the necessary college requirements. In many French language school boards, trained education assistants have worked in JK/SK classes for years and should be eligible to continue in these roles.

As indicated in the bill, all adults working with JK/SK students must be school board employees and all programs, including the extended day program must be housed in our schools in order to ensure the most seamless transition during the day and to grade one and beyond. Furthermore, housing programs within schools would provide access to invaluable capital assets such as school libraries and gymnasiums.

The extended day component to the plan should be staffed by the same school board employed ECEs working with students during the instructional day, again ensuring continuity. These positions must be funded appropriately to allow meaningful, full time, seven hour workdays. The early learning team must also be provided time to train and prepare as a team during the workday and receive professional development during the school year.

OSSTF/FEESO is concerned about section 260.2 in that the principal may delegate their duties with respect to the extended day program of the ELP. If the duties are delegated to a party outside of the school administration, there may be an impact on the seamless transition between the extended day and instructional day program.

The implementation of the Early Learning Plan has broad impact on school boards and their employee groups. A number of existing OSSTF/FEESO collective agreements contain references to early childhood educators. Many education workers now employed in school boards have ECE qualifications and are members of the College of Early Childhood Educators and may apply for positions that become available. This may cause a domino effect and may impact the delivery of special education programs in school boards. Clear timelines and multiyear targets are necessary for the smooth transition into a full early learning program in our schools.