

April 13, 2026

Ministry of Education
315 Front Street West, 11th floor
Toronto ON
M7A 0B8

via: Ontario Regulatory Registry

RE: Proposal Number: 26-EDU001 - Enhancing Health and Safety in Child Care Programs

Middlesex County appreciates the opportunity to provide comments on the Ministry's proposed amendments to Ontario Regulation 137/15 under the *Child Care and Early Years Act, 2014* (CCEYA).

Middlesex County works closely with child care operators, EarlyON Child and Family Centres, and municipal partners across a geographically diverse area that includes both urban-adjacent and rural communities. Through this role, the County is supportive of measures that enhance child safety while ensuring that regulatory requirements remain practical and implementable across a range of service delivery environments.

Middlesex County supports the Province's objective of strengthening health and safety protections within licensed child care settings. The proposed amendments reflect a targeted and measured approach, particularly where they modernize existing requirements or respond to clearly identified risks.

At the same time, Middlesex County encourages the Province to continue to emphasize a risk-based and flexible approach to implementation and to ensure that adequate funding is provided to support these changes. This is particularly important in rural communities and in settings where child care is delivered in partnership with other services through shared or co-located facilities.

Vehicle Impact Protection

The County recognizes the serious safety risks associated with vehicle incursions and supports the Province's intent to address these risks through the design of new child care centres. The decision to apply these requirements only to newly licensed centres effective January 1, 2027 appropriately avoids retroactive impacts on existing facilities and supports long-term improvements in site design. The County encourages the Province to consider establishing funding streams for current sites seeking to add protective barriers.

The proposal also includes an alternative compliance pathway where a certified professional may conduct a threat, vulnerability, and risk assessment and recommend site-specific mitigation measures where physical barriers are not feasible. This is a positive element of the proposal and reflects a more flexible approach.

However, establishing physical barriers as the default expectation may be overly prescriptive in certain contexts. In rural and lower-density areas, risk profiles differ significantly from urban environments, and site constraints may limit the feasibility or appropriateness of barrier-based solutions. In addition, requirements of this nature may

have unintended implications for site layout, including impacts on parking availability, pedestrian movement, and overall accessibility for families.

The County recommends that the Province place greater emphasis on risk-based approaches by recognizing professional risk assessments as an equally valid compliance pathway rather than an exception. Further technical guidance outlining acceptable mitigation strategies would also support consistent and effective implementation across varying site conditions.

Unauthorized Entry

The requirement for all licensed child care centres to implement measures to prevent unauthorized access during hours of operation is supported. The outcome-based nature of the proposal, which allows operators to determine the most appropriate method of access control, is particularly appropriate given the diversity of facilities and operating models across Ontario.

At the same time, practical considerations arise in certain contexts. In Middlesex County, a number of programs operate within shared or co-located facilities, where entrances and access systems are used by multiple service providers. In these environments, responsibility for implementing and managing access control measures may not rest solely with the child care operator, creating potential ambiguity.

Additionally, some programs, including EarlyON Child and Family Centres, operate with limited staffing models. In such cases, managing controlled entry systems while maintaining appropriate supervision of children may present operational challenges.

This challenge is particularly evident in co-located models such as the River Heights Child & Family Centre, where EarlyON programming operates within a shared entrance alongside a licensed child care provider. The EarlyON program operates with a single staff person due to funding constraints, making it operationally impractical to independently manage a buzzer or monitored entry system while maintaining appropriate supervision of children and families. In this context, solutions such as shared access control systems or fob-based entry coordinated with the child care operator may be feasible; however, this requires clear delineation of roles and responsibilities. This example highlights the need for flexibility in implementation and guidance that reflects real-world staffing and facility arrangements.

The County recommends that the Province provide clear guidance regarding roles and responsibilities in shared-entry environments and recognize the need for flexibility in implementation where staffing capacity is limited. Additional guidance specific to co-located service models would further support effective and practical application of these requirements.

Broader Implementation Considerations

In addition to the specific amendments proposed, Middlesex County encourages the Province to consider several broader factors that will influence successful implementation.

Many child care and EarlyON programs within the County operate in co-located or shared facilities, often in partnership with municipalities, schools, or community organizations. The current proposal does not explicitly address how regulatory requirements should be applied in these environments, particularly where infrastructure and operational responsibilities are shared. Clear guidance in this area would reduce uncertainty and support coordinated compliance.

The County also emphasizes the importance of recognizing the realities of rural and small-community service delivery. Facilities are often located in repurposed buildings and may

have limited capacity for physical modifications or operational changes. Many centres in Middlesex County are already operating at their maximum budget through the new Cost Base Funding model. A flexible, context-sensitive approach will be critical to ensuring that regulatory requirements do not unintentionally create barriers to service delivery.

Accessibility and inclusion are also important considerations. Programs such as EarlyON Child and Family Centres are designed to be low-barrier and welcoming for families. Certain measures, including controlled entry systems or physical site modifications, may affect ease of access, particularly for caregivers with mobility needs or multiple children. Ensuring alignment with the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and universal design principles will help maintain inclusive and accessible services. These considerations are particularly relevant in co-located EarlyON environments, where maintaining a low-barrier, welcoming, and accessible entry experience is fundamental to program success.

Finally, the County acknowledges the Ministry's assessment that the proposed amendments may result in additional financial and administrative pressures. Costs associated with capital improvements, policy development, staff training, and ongoing compliance will need to be carefully managed. The provision of funding support, along with standardized tools, templates, and training resources, will be important to support the sector in implementing these changes effectively.

Middlesex County supports the Province's efforts to enhance health and safety in licensed child care settings and recognizes the importance of continuous improvement in protecting children.

The proposed amendments are generally well-considered and appropriately scoped, particularly where they incorporate phased implementation and allow for flexibility in how outcomes are achieved. Strengthening the proposal through a continued emphasis on risk-based approaches, clear guidance for co-located and rural service environments, and alignment with accessibility and operational realities will help ensure that these changes are both effective and sustainable across Ontario.

The County appreciates the opportunity to provide input and would welcome continued engagement as the Ministry advances this important work.

Sincerely,

A handwritten signature in black ink, appearing to read "Sue Clarke". The signature is fluid and cursive, with a large initial "S" and "C".

Sue Clarke
Warden