

# Analysis of Director Approvals in Ontario's Licensed Child Care System (2021 to 2025) Based on FOI Data from the Ministry of Education

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## Executive Summary

This report analyzes data obtained through a Freedom of Information (FOI) request to the Ministry of Education on the use of Director Approvals (DAs) under *O. Reg. 137/15, s. 54(1)*, item 2 of Ontario's *Child Care and Early Years Act* between 2020 and 2025 (as of May 30). DAs permit individuals who are not Registered Early Childhood Educators (RECEs) to temporarily fulfill roles that generally require an RECE qualification.<sup>1</sup>

The data reveal a sharp and sustained increase in the use of DAs across Ontario's licensed child care system. Originally intended as a temporary measure to address short-term staffing gaps, DAs have now become a structural mechanism to keep programs operational amid chronic shortages of qualified educators.

Between 2020-21 and 2024-25, the total number of child care centres with DAs grew by 1,156%, with projections showing continued growth through 2025-26. The rise in DAs has outpaced the development of the RECE workforce, indicating that Ontario's early learning and child care system is becoming increasingly reliant on non-qualified staff to maintain basic licensing compliance.

Across Ontario, the number of supervisory and program staff working under DAs has increased most sharply, showing that workforce instability affects all levels of program operation. While the number of RECEs in good standing continues to grow each year modestly, this growth has not translated into stable staffing levels. The data instead reveal a staffing and retention crisis.

Overall, the findings demonstrate that the use of DAs has become a systemic response to workforce shortages, with implications for quality, accountability, and Ontario's ability to meet its Canada-Wide Early Learning and Child Care (CWELCC) expansion targets.

Addressing these challenges will be essential to building a stable, qualified workforce capable of delivering high-quality early learning and care for all children in Ontario. A province-wide, fully funded, pay equity-compliant, wage grid for RECEs, paired with retention measures such as paid professional learning and comprehensive benefits, is urgently needed to stabilize the workforce. Ensuring fair, competitive, and consistent compensation across all child care settings, along with supports that value experience and promote long-term career growth, would reduce turnover, strengthen program continuity, and help rebuild a qualified workforce capable of meeting Ontario's current and future system demands.

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<sup>1</sup> We did not include directors' approvals for RECE Supervisors or RECE Home Child Care Visitors.

# Key Findings

## 1. Director Approvals Have Dramatically Increased Since 2020

- DAs rose from 159 in 2020-21 to 1,997 in 2024-25, and over 397 had already been issued for the 2025-26 year (as of May 2025).
- When compared to the RECE workforce (RECE supervisors and program staff), DAs increased from 3% of the total RECEs in 2022-23 to 9% in 2024-25.
- This growth indicates that DAs have shifted from a temporary measure to a systemic staffing tool.

## 2. The RECE Workforce Is Growing, But Not Fast Enough

- The College of Early Childhood Educators reports 65,973 members in good standing (2024-25): up from 58,867 in 2020-21.
- However, while RECE membership increased by 12%, the number of DAs (159 to 1,997) increased by more than 1,000% over the same period.
- The persistent gap between workforce growth and operational needs has led to greater reliance on non-qualified personnel.

## 3. Supervisory and Program Staff Shows Increasing Reliance on Non-RECEs

- By 2024-25, 21% of supervisors held a DA rather than an RECE qualification.
- Among program staff, the share of non-RECEs rose from 2.5% in 2022 to 8% in 2024.
- Between 2022-23 and 2024-25, the number of non-RECE supervisors increased by 151%, whereas the number of new supervisors with an RECE increased by 118%.
- These figures suggest a disturbing pattern: the sector's leadership is increasingly being led by unqualified, unaccountable professionals.

## 4. Regional Patterns Reveal Uneven Workforce Pressures

- The East Region issued the most DAs (1,000), despite having a smaller share of the provincial RECE workforce, reflecting a bilingual staffing shortage.
- Northern regions issued comparable numbers of DAs despite their smaller size, with some CMSM/DASSAB reporting more approvals than centres, signalling severe recruitment challenges.
- These regional pressures demonstrate that workforce instability is province-wide but more acute in areas with additional linguistic or geographic barriers.

## 5. Persistent Staffing and Retention Challenges Across the Sector

- The number of DAs has increased far faster than the growth of the RECE workforce, indicating high turnover and retention difficulties.
- The increase in DAs among non-RECE supervisors and program staff shows that workforce instability affects all levels of operation.

- Without sustained and increased investment in wages, benefits, and professional development, licensed child care programs will remain dependent on temporary staffing measures to stay operational.

## **6. Director Approvals Show Predictable Seasonal Peaks**

- Line graph analysis shows consistent spikes in September/Fall each year, aligning with the start of the school and child care year.
- These recurring increases suggest that DAs are now a predictable and cyclical element of workforce management rather than an emergency response.

## **7. Accountability Gap for Unqualified Staff Working Under Director Approvals**

- The College of Early Childhood Educators (CECE) has identified that individuals working under DAs are not regulated or held to professional standards.
- This gap applies to those working in roles such as supervisors, home child care visitors, resource consultants, and program staff.
- The absence of oversight increases risks to program quality, child safety, and professional integrity, reinforcing the need for regulatory reform and new accountability mechanisms.

# Introduction

This report analyzes data obtained through a Freedom of Information (FOI) request to the Ministry of Education regarding the use of Director Approvals (DAs) under O. Reg. 137/15, s. 54(1), item 2 of Ontario's *Child Care and Early Years Act* from 2020 to 2025 (as of May 30). DAs permit individuals who are not Registered Early Childhood Educators to temporarily fulfill roles that would otherwise require a Registered Early Childhood Educator (RECE) designation.

## Staffing shortages are a key barrier to expansion

The data below depicts a growing reliance on DAs over the last few years. This increased reliance on DAs to temporarily fill roles that would otherwise require an RECE is an administrative response to a deepening RECE retention and recruitment crisis that jeopardizes the expansion of the \$10-a-day child care program.

By relying on DAs, the province is attempting to circumvent the shortage of RECEs. However, as the CECE notes, individuals working under DAs are not accountable to any professional regulatory body in the way that RECEs are accountable to the CECE.<sup>2</sup> Although licensed child care centres are regulated under the *Child Care and Early Years Act* (CCEYA), this oversight applies to the program as a whole rather than to the conduct or competence of individual staff. This creates significant issues for both safety and quality: without individual regulatory oversight, misconduct can go unchecked, and DAs are not required to participate in ongoing professional learning or meet consistent professional standards.

The growing reliance on DAs is indicative of a recruitment and retention crisis. RECEs are leaving the sector due to low wages, lack of benefits, and poor working conditions. The set wage floor of \$24.86 hourly for RECEs is insufficient. Advocates have repeatedly called for implementing a pay equity-compliant wage grid with higher compensation levels, as well as pensions and benefits, to adequately address current staff shortages.<sup>3</sup>

In 2022, when Ontario signed the CWELCC agreement, 59% of full-time staff were RECEs. That share has since dropped to 56%, moving the province further away from its stated goal of having 60% of licensed staff as RECEs by 2025-26. This decline is attributed to a larger increase in the hiring of non-RECE staff.<sup>4</sup>

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<sup>2</sup> College of Early Childhood Educators, *Regulatory Registry Feedback: Consultation Regarding Proposed Regulatory Amendments under the Child Care and Early Years Act, 2014* (Toronto: College of Early Childhood Educators, November 2020).

<sup>3</sup> Susan Colley and Jan Borowy, *Justice for Child Care Employees: Securing Equitable Wages in the Canada-Wide Early Learning and Child Care System in Ontario* (Toronto: Building Blocks for Child Care (B2C2), 2025), <https://b2c2.ca/wp-content/uploads/2025/11/pay-equity-childcare-paper-1.pdf>; and Early childhood educators in Ontario declining, report finds," CBC News, November 27, 2025, <https://www.cbc.ca/news/canada/toronto/early-childhood-educators-ontario-declining-report-1.7417780>

<sup>4</sup> Early childhood educators in Ontario declining, report finds," CBC News, November 27, 2025, <https://www.cbc.ca/news/canada/toronto/early-childhood-educators-ontario-declining-report-1.7417780>

Staffing shortages have been cited by many in the sector as a key barrier to child care expansion in Ontario. The staffing shortage makes it difficult for centres to operate at full capacity, let alone expand. The province needs an estimated 10,000 new RECEs by 2025-26 to meet its space creation target outlined in the CWELCC agreement.<sup>5</sup>

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<sup>5</sup> Office of the Auditor General of Ontario, *Canada-wide Early Learning and Child Care Program: Independent Auditor's Report* (Special Report 2025), October 1, 2025, [https://www.auditor.on.ca/en/content/specialreports/specialreports/en25/AR-PA\\_CELandCCP\\_en25.pdf](https://www.auditor.on.ca/en/content/specialreports/specialreports/en25/AR-PA_CELandCCP_en25.pdf)

# Objectives of the Report

Building Blocks for Child Care (B2C2), a registered charitable non-profit organization dedicated to expanding and preserving accessible, affordable, and high-quality non-profit and public early learning and child care, conducted this research to better understand the scope and implications of DAs. It also sought to deepen its understanding of the barriers to expansion caused by staff shortages. The following three key objectives guide this report:

## **1. Quantify the Extent of Reliance on Director Approvals**

To document the number, regional distribution, and growth of DAs across Ontario, illustrating how they have evolved into a systemic response to staffing shortages.

## **2. Identify Regional and Auspice-Based Patterns**

To compare reliance on DAs across regions, auspice, and staff roles to reveal where workforce pressures are most acute.

## **3. Examine Barriers to Expansion**

To assess how ongoing RECE staffing shortages are limiting the operation and growth of licensed child care programs, and how the increasing reliance on DAs reflects the sector's inability to expand without sufficient qualified staff.

# Methodology

This report draws on data obtained through an FOI request submitted by B2C2 to the Ontario Ministry of Education. The data was received on September 2, 2025. The FOI request sought to document the use of DAs under **Ontario Regulation 137/15, section 54(1), item 2**, which allows individuals who are not RECEs to temporarily fulfill roles that would otherwise require RECE qualifications.

## FOI Requests

### 1. Total Number of Director Approvals

- The total number of director approvals issued across the Province of Ontario under O. Reg. 137/15, s. 54(1), item 2, where the approval permitted an individual who is a non-RECE to fulfill a role otherwise requiring an RECE, for each of the past five (5) calendar years.
- This information may be found in internal Ministry reports, annual summaries, licensing databases, or approval tracking systems used by regional licensing branches.

### 2. Breakdown of Director Approvals by Region

- A regional breakdown of the above approvals by service system managers.
- Please indicate the data source(s) used for regional coding or classification, such as internal Ministry maps or regional assignment frameworks.

### 3. Breakdown by Auspice Type

- A breakdown of director approvals based on the type of child care program auspice, including:
  - Non-profit operators (including Montessori)
  - For-profit operators (including Montessori)
  - Publicly operated programs
  - Montessori centres/schools vs. non-Montessori programs (Please note: For this sub-category, we are not requesting a breakdown by profit or non-profit status—only whether the program is Montessori or not.)
- This information may be available in operator licensing files, registration systems, or internal Ministry classification tools.

### 4. Breakdown by Role Type

- If available, a breakdown of director-approved individuals by job role, including but not limited to:
  - Program director
  - Staff working directly with children
  - Support or administrative staff
- Please indicate whether job role information is systematically captured during the approval process and in which system or format.

### 5. Policies, Guidance Documents, and Criteria

- Any internal or public-facing documents that outline the guidance, criteria, or policies used by directors when assessing and approving

- individuals under s. 54(1), item 2 - particularly in cases involving substitution of non-RECEs.
- This may include policy manuals, training materials, email communications, checklists, or decision-making frameworks.

## Data Sources and Supplementary Materials

The Ministry provided raw data on DAs, organized by region, auspice type, and staff role. To contextualize and analyze this data, B2C2 supplemented the FOI results with publicly available information from **Ontario's Early Years and Child Care Annual Reports (2020–2024)** and follow-up communications with the **College of Early Childhood Educators (CECE)**.

It is important to note that the DA data provided by the Ministry of Education represent **approvals issued to licensed child care centres, not to individual staff members**. This distinction should be considered when interpreting total counts and growth trends over time.

## Analysis

During the data review process, it was identified that the Ministry's dataset included DAs issued to both **qualified (RECE)** and **non-qualified** individuals. All supervisors and home child care visitors must receive a DA from the Ministry. Since the purpose of this analysis is to examine the system's reliance on unqualified staff, two categories were excluded:

- RECE Supervisors
- RECE Home Child Care Visitors

The analysis, therefore, focuses exclusively on DAs granted to unqualified staff, specifically:

- Home Child Care Visitors (otherwise approved)
- Non-RECE Supervisors (otherwise approved)
- Program Staff to take the place of an RECE (otherwise approved)
- Resource Teachers

This refined scope ensures that the findings reflect the **extent of the sector's dependence on non-qualified staff** and the implications for workforce stability, program quality, and system growth.

The data was categorized and analyzed using spreadsheet and charting tools to identify trends over time and across regions. Calculations included:

- **Year-over-year growth** in DAs;
- **Percentages** of DAs to the total number of RECEs, and to the number of licensed child care centres per region; and
- **Comparisons by auspice type** (for-profit vs. not-for-profit) to evaluate sectoral reliance on DAs.

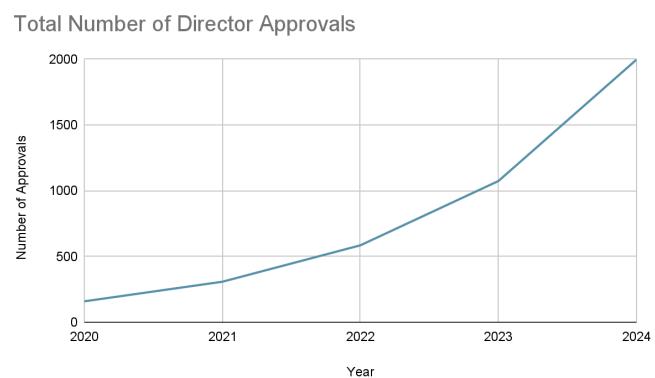
# Findings

## 1. Total Number of Director Approvals

DAs for non-qualified staff are intended as an exceptional measure, permitting non-RECEs to temporarily (long-term or short-term) fill roles that generally require an RECE. However, the data shows that over the last five years, these approvals have grown significantly, suggesting that they now function as a systemic response to workforce shortages rather than a rare exception.

The table below shows the total number of DAs granted annually from 2020-21 to 2024-25.

Year	Total Number of Director Approvals
2020-2021	159
2021-2022	308
2022-2023	585
2023-2024	1,075
2024-2025	1,997
<b>Total</b>	<b>4,124</b>



From 2020-21 to 2024-25, the total number of DAs increased **by 1,156%, with 4,124 approvals over the five** years. This represents a year-over-year increase of roughly **2x**, demonstrating a consistent and accelerating reliance on DAs. The total number of DAs for **2025-26 (as of May 30)** was 397, representing an average monthly trend of about 199 DAs. **If this trend continues, the total number of DAs for 2025-26 will surpass the 2024-25 levels by year-end.**

The table below shows the total number of DAs and RECEs in licensed child care from 2022-23 to 2024-25.

Year	Number of Director Approvals	Total Number of RECEs	(Approvals as % of RECEs)
<b>2022-2023</b>	585	19,112	<b>3%</b>
<b>2023-2024</b>	1,075	20,947	<b>5%</b>
<b>2024-2025</b>	1,997	22,600	<b>9%</b>

When DAs are compared to the total RECE workforce, the proportion of DAs is also rising:

- In **2022-23**, DAs equalled **3% of the RECE workforce**.
- By **2023-24**, this had climbed to **5% of the RECE workforce**.
- In **2024-25**, DAs represented **9% of the RECE workforce**.

This indicates that DAs are no longer isolated or exceptional but have become a systemic government mechanism to address workforce shortages. The year-over-year growth in DAs highlights an ongoing, intensifying shortage of qualified RECEs, with DAs serving as a structural workaround. The increasing percentage of DAs relative to the RECE workforce underscores the system's growing reliance on non-RECE staff to maintain licensed child care operations.

While the total number of RECEs continues to grow, the parallel and rapid rise in DAs raises significant concerns about the sustainability and quality of Ontario's early learning and child care workforce. According to the **College of Early Childhood Educators' 2024-2025 Annual Membership Data Overview**, there are **65,973 members in good standing as of 2024-2025, up from 58,867 in 2020-21**, reflecting a steady increase in the number of qualified professionals. The College also reports that the **average number of new members over the past 5 years was 5,441**, and that **6,288 new RECEs joined in the most recent fiscal year (2024-2025)**, a modest but positive sign of growth in the profession.<sup>6</sup>

However, despite these increases, the number of DAs has grown much faster. Between 2020-21 and 2024-25, DAs increased by more than 1,000%, from 159 to 1,997 DAs. When viewed relative to the RECE workforce, the growth in DAs is disproportionate and accelerating.

Crucially, this trend must also be understood in the context of the **province's unmet workforce needs**. As highlighted by the Auditor General of Ontario. They found that **up to 10,000 additional RECEs** will be required by **December 2026** to support

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<sup>6</sup> College of Early Childhood Educators, *2024-2025 Annual Membership Data Overview* (Toronto: College of Early Childhood Educators, 2025).

CWELCC expansion.<sup>7</sup> The scale of this projected shortage far exceeds current growth in the RECE workforce, underscoring why the system is increasingly dependent on DAs.

Although more individuals are becoming RECEs each year, the system's increasing dependence on DAs reflects persistent retention challenges, uneven distribution of qualified staff, and ongoing recruitment barriers. The use of DAs has shifted from an emergency response to a **systemic staffing model** that compensates for structural shortages in qualified educators.

The growing reliance on DAs carries implications for **program quality, professional integrity, and accountability**. DAs are not bound by the same professional standards or continuous professional learning requirements as RECEs, yet they are increasingly present in roles central to program delivery. This disproportionate expansion of non-qualified staff effectively dilutes the professional and regulatory standards that define Ontario's early learning and child care framework.

In summary, while the RECE workforce continues to grow in both size and entry rates, the **pace of DA expansion far exceeds the growth of qualified educators**. Unless addressed through coordinated policy measures, such as improved retention strategies, compensation reform, and tighter limits on DA use, this trend risks undermining the professionalization and quality objectives of Ontario's early learning and child care system.

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<sup>7</sup> Office of the Auditor General of Ontario, *Canada-wide Early Learning and Child Care Program: Independent Auditor's Report* (Special Report 2025), October 1, 2025, [https://www.auditor.on.ca/en/content/specialreports/specialreports/en25/AR-PA\\_CELandCCP\\_en25.pdf](https://www.auditor.on.ca/en/content/specialreports/specialreports/en25/AR-PA_CELandCCP_en25.pdf)

## 2. Breakdown of Director Approvals by Region

Across the province, DAs vary widely by region. The table below shows the total number of DAs issued from 2020-21 to 2024-25, alongside the total number of licensed child care centres in each region.

Region	CMSM / DSSAB	Total Director Approvals from 2020-2021 to 2024-2025	Total number of Child Care Centres as of 2024-2025 <sup>8</sup>	Percentage of DAs per Child Care Centre
<b>Central East Region</b>		<b>458</b>	<b>1,218</b>	<b>38%</b>
	Toronto	204	809	25%
	Durham	254	408	62%
	York	0	1	0%
<b>Central North Region</b>		<b>713</b>	<b>1,152</b>	<b>61%</b>
	Kawartha Lakes	13	29	45%
	Peterborough	44	90	49%
	Toronto	87	262	33%
	Not available <sup>9</sup>	1	5	20%
	Durham	0	1	0%
	York	568	765	74%
<b>Central West Region</b>		<b>249</b>	<b>1,103</b>	<b>23%</b>
	Toronto	86	353	24%
	Dufferin	12	40	30%
	Peel	151	710	21%
<b>East Region</b>		<b>1,000</b>	<b>1,190</b>	<b>84%</b>
	Cornwall	48	57	84%
	Kingston	62	109	57%
	Ottawa	633	601	105%
	Dufferin	0	1	0%
	Hastings	40	94	42%
	Lanark	6	35	17%

<sup>8</sup> Ontario Government, *Licensed child care facilities in Ontario* [dataset], Ontario Data Catalogue. <https://data.ontario.ca/dataset/licensed-child-care-facilities-in-ontario/resource/2b81313c-9ada-4680-abba-4470ec386a2e>

<sup>9</sup> Where “not available” appears under the CMSM/DSSAB column, it indicates that the child care program is managed by a First Nation, rather than a CMSM/DSSAB.

	Lennox & Addington	20	46	44%
	Northumberland	22	49	45%
	Renfrew	20	45	44%
	Not Available	5	12	42%
	Leeds & Grenville	51	67	76%
	Prescott and Russell	93	74	125%
<b>North Region</b>		<b>626</b>	<b>1,135</b>	<b>55%</b>
	Algoma	30	20	150%
	Greater Sudbury	64	112	57%
	Bruce	28	56	50%
	Grey	30	88	34%
	Simcoe	222	313	71%
	Muskoka	15	38	39%
	Cochrane	39	64	61%
	Nipissing	22	72	31%
	Parry Sound	7	40	18%
	Sault Ste Marie	14	63	22%
	Timiskaming	22	35	63%
	Kenora	35	60	58%
	Manitoulin-Sudbury	20	22	91%
	Not Available <sup>10</sup>	28	54	52%
	Rainy River	14	19	74%
	Thunder Bay	36	79	46%
<b>Southwest Region</b>		<b>486</b>	<b>1,258</b>	<b>39%</b>
	Brantford	0	26	0%
	London	167	261	64%
	St. Thomas	33	51	65%
	Stratford	8	52	15%
	Windsor	132	212	62%
	Huron	7	39	18%
	Lambton	34	101	34%
	Oxford	22	58	38%
	Chatham-Kent	12	77	16%
	Norfolk	1	1	100%
	Not Available <sup>11</sup>	2	17	12%
	Waterloo	68	363	19%
<b>West</b>		<b>592</b>	<b>1,312</b>	<b>45%</b>

<sup>10</sup> Ibid..

<sup>11</sup> Ibid.

Region				
	Brantford	53	63	84%
	Hamilton	124	320	39%
	London	0	1	0%
	Wellington	51	164	31%
	Norfolk	16	65	25%
	Halton	664	417	159%
	Niagara	84	282	30%
<b>Total</b>		<b>4,124</b>	<b>8,369</b>	<b>49%</b>

The data highlights differences in both the total number of DAs and the proportion of centres receiving at least one DA, but the information has important limitations. The dataset only shows **the number of DAs issued in each region**, not **the number issued per individual centre**. A single centre may receive multiple DAs, while another may receive none. The comparison to the number of centres is therefore intended **only to show a relative scale** (i.e., the volume of DAs issued compared to the size of the regional child care system). Determining the exact number of DAs per centre is outside the scope of this data. We also do not have sufficient information to explain the causes of the trends the data shows in depth. Factors such as the number of centres directly operated by CMSMs/DSSABs, differences in unionization, local labour-market conditions, and the availability of qualified RECEs may all influence these results, but cannot be confirmed from the available data.

## Regional Patterns

- The **East Region** stands out province-wide, with **1,000 DAs across 1,190 centres (84%)**, the highest proportion in Ontario. Ottawa (**633 DAs for 601 centres (105%)**) and Prescott and Russell (**93 DAs for 74 centres (126%)**) in particular show extremely high DA rates, meaning most centres in both locations required at least one DA over the five years.
- The **Central North Region** also shows firm reliance (**61%**), driven heavily by York, where **74%** of centres had a DA.
- In the **West Region**, reliance is uneven: while the regional percentage is **45%**, Halton shows a notably high proportion (**159%**), indicating multiple DAs per centre on average.
- Despite having large numbers of centres, the **Central West Region (23%)** and **Central East Region (38%)** regions show comparatively lower reliance on DAs. For example, **Peel (21%)** and **Toronto, within the Central East Region (25%)**, **report DA levels well below those seen in regions such as** Ottawa, York, or Halton.
- Several **northern and rural CMSMs/DSSABs** display high proportional reliance despite small system sizes, including **Algoma (150%)**, **Manitoulin–Sudbury (91%)**, **Rainy River (74%)**, and **Timiskaming (63%)**.

## Overall Patterns

Taken together, the data highlight apparent **regional differences** rather than a uniform provincial trend:

- Some urban regions generate very high volumes and proportions of DAs, especially Ottawa, York, and Halton.
- Some large regions rely on DAs much less frequently, such as Central West and Central East.
- Many northern and rural areas show disproportionately high percentages, even when overall DA numbers are lower.

However, **we cannot explain these patterns definitively** based on the available information. The differences may be influenced by:

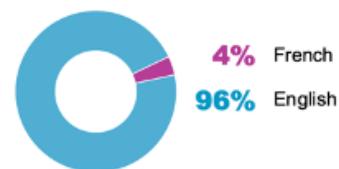
- Differences in the number of centres directly operated by CMSMs/DSSABs
- Unionized vs. non-unionized staffing environments
- Local labour-market pressures and competition for RECEs
- Regional variation in wages, recruitment incentives, and working conditions
- Availability of qualified RECEs relative to population growth
- Rural, remote, or northern recruitment challenges
- Bilingual staffing requirements in certain regions (particularly Eastern Ontario)

## Context from CECE Membership Data

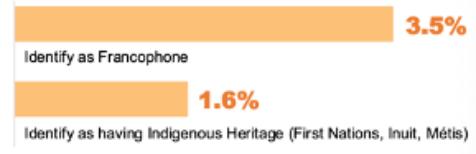
The CECE data provides helpful background on the composition and distribution of the RECE workforce:

- **Language:** Only **4%** of RECEs prefer French, and **3.5%** identify as Francophone.
  - This may help contextualize the high reliance on DAs in bilingual regions such as Ottawa and Prescott–Russell.
- **Geography:** RECEs are concentrated in **Toronto (22%)**, **Central West (21%)**, and **Central East (18%)**, while only **6%** of RECEs are located in the North and North East Region.
  - This may help contextualize why several northern CMSMs/DSSABs show high DA proportions.

### Membership by Language Preference<sup>7</sup>



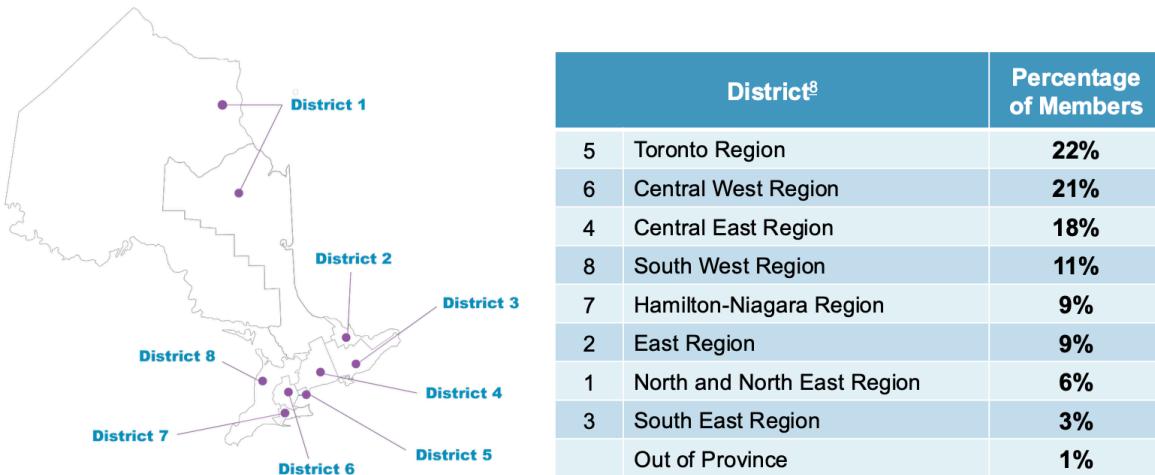
### Membership by Self-identification



These factors may contribute to regional differences in staffing capacity, but they

cannot definitively explain the DA patterns. The tables on Membership by Language Preference and the College of Early Childhood Educators' 2024–2025 membership data (from the *2024–2025 Annual Membership Data Overview*) have been reproduced here to illustrate the distribution of College members and the language preferences of RECEs across the province.<sup>12</sup>

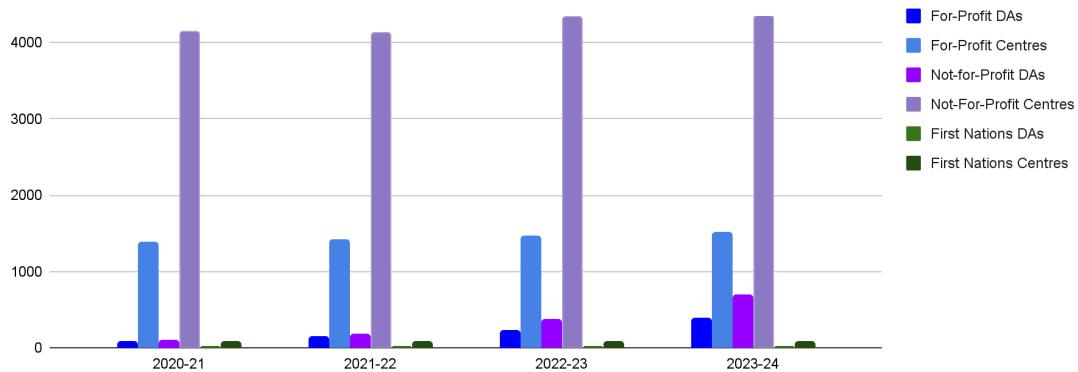
## College of Early Childhood Educators' 2024–2025 Membership Data



## 3. Breakdown by Auspice Type

The following section compares the number of DAs and licensed child care centres in Ontario by auspice type (for-profit, not-for-profit, and First Nations).

Comparison of DAs to Centres by Auspice



<sup>12</sup> College of Early Childhood Educators, *2024–2025 Annual Membership Data Overview* (Toronto: College of Early Childhood Educators, 2025).

## Provincial Trends (2020-2025)

Year	For-Profit DAs	Total For-Profit Centres	Percentage	Not-for-Profit DAs	Total Not-for-Profit Centres	Percentage	First Nations DAs	Total First Nations Centres	Percentage
2020-21	70	1,368	6.2%	87	4,138	2.1%	2	74	2.7%
2021-22	137	1,412	9.7%	167	4,131	4.04%	4	73	5.5%
2022-23	224	1,448	15.5%	357	4,328	8.3%	4	75	5.33%
2023-24	383	1,495	26%	681	4,341	15.7%	11	75	14.66%



Across all auspices, the number of DAs has increased sharply, while the number of licensed centres has grown only modestly.

- **Not-for-profit:** DAs rose from **87 in 2020-21** to **681 in 2023-24**, a **13%** increase, while the number of centres increased by only **5%**.
- **For-profit:** DAs grew from **70 to 383**, an **18%** increase, compared to only **9% growth** in centres.
- **First Nations:** Although absolute numbers are small, DAs rose from **2 to 11** (18% increase), indicating that workforce pressures extend across rural and Indigenous settings.

This divergence shows that staffing shortages, not system expansion, are driving the escalating use of DAs.

## Montessori vs. non-Montessori centres

Between 2020 and 2024, the number of Montessori centres in Ontario rose from **55 to 372**. This rapid growth raises questions about program quality and professional standards. Information gathered from the **CECE** raises serious concerns regarding the implications of this growth for program quality, professional standards, and accountability. The College confirmed that **no Montessori-based education programs are currently approved or recognized as equivalent** to accredited Early Childhood Education (ECE) programs in Ontario. Montessori education does not meet provincial program standards because it is grounded in a single developmental philosophy rather than encompassing multiple perspectives on child development and pedagogy. Further, **Montessori programs are typically shorter and do not cover the full range of coursework** outlined in government-approved ECE curricula.

The CECE discussion also highlighted that individuals trained in Montessori education may work in early learning settings **through DAs**, and whose employment is limited to specific roles for which their training is applicable. However, the growing reliance on DAs has created **a parallel workforce system** with limited oversight and no formal mechanisms for accountability or mobility across settings.<sup>13</sup>

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<sup>13</sup> Conversation with a representative of the College of Early Childhood Educators, October 10, 2025.

## 4. Breakdown by Role Type

Between 2020-21 and 2024-25, a total of 4,124 DAs were granted for all non-RECE staff roles in licensed child care programs. Although DAs were initially designed as temporary measures to address short-term staffing gaps, the data indicate that they have evolved into a long-term solution for staffing shortages.

Staff DA Request Type	Total
Home Child Care visitor with other qualifications (otherwise approved)	28
Non-RECE Supervisor (otherwise approved)	688
Program Staff to take the place of an RECE (otherwise approved)	3,403
Resource Teacher	5
<b>Total</b>	<b>4,124</b>

The data on supervisory positions show a clear and steady rise in the number and proportion of non-RECE supervisors receiving DAs.

Year	Total Number of RECE Supervisors	Total Number Non-RECE supervisor
2022-23	620	114
2023-24	766	178
2024-25	1,355	286

Between 2022-23 and 2024-25, the number of new non-RECE supervisors increased by **151%**, while new RECE supervisors increased by **118%**.

Supervisors play a critical role in upholding program quality, supporting staff, and ensuring compliance with the *Child Care and Early Years Act*. The increasing proportion of non-RECE supervisors, therefore, represents a concerning shift in the composition of leadership and oversight within Ontario's early learning and child care sector.

The same trend is evident among program staff, with the number of non-qualified staff growing sharply over the past three years.

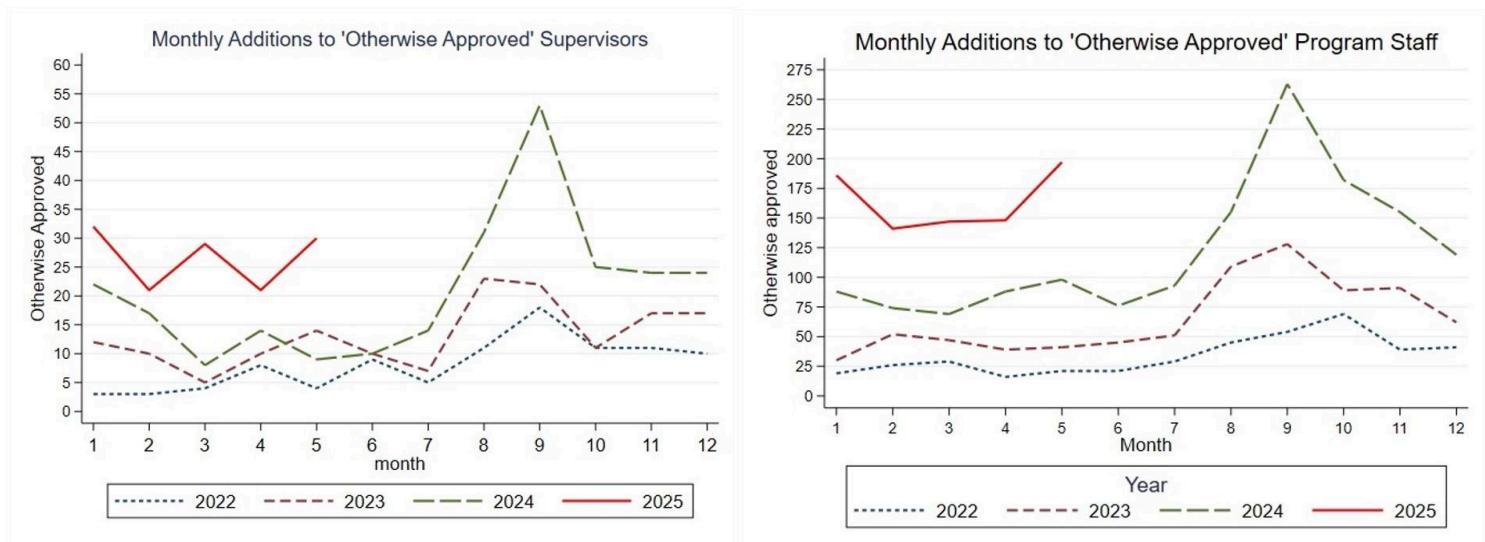
Year	Total Number of RECE Program Staff	Total Number of non-RECE program staff
2022-23	18,492	464
2023-24	20,181	886
2024-25	21,245	1,703

From 2022-23 to 2024-25, the number of non-RECE program staff was over **200%** higher (464 to 1,703), while RECE program staff increased by only **14%**.

This rapid shift illustrates an **accelerating dependence on non-RECE program staff** to sustain daily operations. The expansion of DAs has outpaced the growth in qualified educators, indicating that workforce shortages are increasingly addressed through temporary exemptions rather than through the recruitment and retention of RECEs.

The accompanying line graphs illustrate the year-over-year and monthly trends in DAs from 2020 to 2025 (as of May 30).

Both line graphs show a steady upward trajectory in DAs for both non-RECE supervisors and non-RECE program staff, with the sharpest growth occurring between 2022 and 2024. This also displays a clear **seasonal pattern**, with spikes in DAs requests around **September each year**, corresponding to the start of the school and child-care year when enrolments increase and staffing pressures peak.



This recurring trend suggests that the use of DAs is **predictable and cyclical** rather than temporary or exceptional. Operators rely on these DAs each fall to meet their qualification requirements, indicating that staffing shortages are **systemic and recurring** rather than situational.

## 5. Policies, Guidance Documents, and Criteria

### Essential Requirements for Approval

- The licensee must justify why a non-RECE candidate is the “best fit” if an RECE applied but was not hired.
- Individuals must indicate their plans for professional development or additional training to meet the requirements of O. Reg. 137/15.
  - Examples of exceptions where additional training may not be required:
    - Accredited Montessori qualifications for a Montessori program.
    - Temporary coverage (e.g., parental/sick leave).
    - Relevant credentials for kindergarten group roles.
- A request for an individual to work with infant, toddler, preschool or family age groupings should indicate that the individual is willing to acquire additional training in Early Childhood Education.
- Approvals are reviewed at licence renewal or when concerns arise.
- Short-term approvals may be granted while recruiting RECE staff; evidence of continued recruitment is required.
- Amended approvals revoke previous approvals and replace them with new ones.

## Common Conditions

- Reading the Child Care Licensing Manual.
- Continuing RECE training.
- Approval is limited to specific age groups.
- Participation in mentorship with an experienced RECE.

## Reasons for Refusal

- Candidate does not demonstrate sufficient fit or relevant qualifications.
- Lack of commitment to acquire the required training/credentials where necessary.
- Licensee fails to provide justification or evidence of continued recruitment (for short-term approvals).

## Conclusion

The findings from this report make clear that Ontario's early learning and child care system is facing a **structural workforce crisis**. The dramatic increase in **DAs** since 2020-21 reveals that staffing shortages are no longer temporary but deeply embedded within the system.

Between 2020-21 and 2024-25, the number of DAs issued to unqualified staff grew by **1,156%**, with continued growth expected in 2025-26. This surge cannot be explained solely by system expansion. It reflects the sector's growing dependence on unqualified personnel to maintain basic program operations.

While the number of **RECEs** in good standing has increased modestly over the same period, this growth has **not translated into a stable workforce** within licensed child care settings. Instead, the increase in DAs between 2020-21 and 2024-25 was approximately 26% of the rise in RECE membership. This disconnect demonstrates a **retention crisis**: educators are entering the profession but leaving due to poor compensation, limited career progression, and challenging working conditions.

Between 2022-23 and 2024-25, new **non-RECE supervisors increased by 151%**, compared with a **118% increase in RECE supervisors**. Over the same period, **non-RECE program staff grew by over 200%**, while **RECE program staff increased by only 14%**. This trend represents an erosion of the qualified workforce and a dilution of professional oversight across the sector. When unqualified staff routinely fill roles designed for RECEs, program quality, safety, and accountability are inevitably compromised.

The use of DAs has also become **predictable and cyclical**, peaking in September, coinciding with the start of the school and child care year. What was designed as a short-term measure to address emergencies has now become a **permanent feature** of the workforce structure.

Ontario's ability to deliver on its **CWELCC** expansion goals depends on a stable, qualified workforce. Without immediate and sustained investment in wages, retention supports, and professional accountability, the sector will remain trapped in a cycle of crisis staffing and declining quality.

# Moving Forward: Addressing the Workforce and Retention Crisis

The data presented in this report make clear that Ontario's early learning and child care system is being sustained through **short-term staffing measures** rather than long-term workforce investment. To ensure that every child in licensed care is supported by a **qualified and stable educator**, urgent action is needed to rebuild a strong, accountable, and professionally supported workforce.

## 1. Strengthen Workforce Retention and Compensation

Establish a **province-wide pay equity-compliant wage grid** that ensures fair and competitive pay for all RECEs across child care settings.

## 2. Reduce Reliance on Director Approvals

Implement **time limits and renewal restrictions** to ensure DAs remain a temporary tool for emergency staffing, not a long-term solution.

Develop **funded pathways** to help individuals currently working under DAs obtain their ECE credentials.

## 3. Close the Accountability Gap

The **CECE** has identified that individuals working under DAs are **not regulated or held accountable** to professional standards. This creates a two-tier system where RECEs are governed by ethical and competency requirements, while unqualified individuals are not.<sup>14</sup>

Professional regulation is not a burden; it is a safeguard. Without it, misconduct or unsafe practice can occur unchecked, and unregulated staff can move between centres without oversight or consequences.

## 4. Reaffirm the Goal: A Fully Qualified Workforce

Ontario's early learning and child care system was designed to provide **high-quality education and care led by qualified professionals**. The growing reliance on unqualified staff through DAs threatens this vision.

By investing in **fair compensation, retention supports, professional accountability, and transparent workforce data**, Ontario can move beyond crisis management and toward a sustainable, experienced child care system: one that values its educators and ensures every child receives the quality of care they deserve.

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<sup>14</sup> College of Early Childhood Educators, *Regulatory Registry Feedback*, 2020.