

Amy Minor Testimony House Education Committee
April 1, 2026
Provisional Licensure for Private Preschool Employees

Good morning. I am Amy Minor, Superintendent of Colchester Schools and President of the VSA. For today's testimony, I think it is also important to share that I am the Chair of the Vermont Standards Board for Professional Educators (VSBPE), essentially the licensing board for the Agency of Education (AOE).

As always, thank you for the opportunity to testify. Preschool provides tremendous value for our students. Colchester is currently not expanding preschool due to fiscal challenges, however we tremendously value preschool, and CSD is interested in expanding our preschool programming as long as there is state-wide funding to offset those costs.

I want to share a significant concern regarding the current role of public school superintendents in the process by which private preschool employees request and obtain provisional educator licenses.

Historical Context: I would like to share my understanding of the history regarding provisional licensure for private preschool employees. Under Secretary Holcombe, Deputy Fowler led an initiative where the AOE sponsored all provisional licenses for private preschools. That system worked well.

At some point, that process ended; I am not certain why. Approximately three to four years ago, Wendy Scott, an agency employee, ran a two-year pilot program that allowed the AOE to sponsor these licenses. While the pilot was not perfect, the process did create a viable path to licensure.

It required superintendents to write a letter essentially denying an individual's request for sponsorship. It was a simple, functional step that did not take long to complete. However, this program has also ended, which I understand was due to a lack of funding for mentors. There were also challenges regarding private preschool centers receiving public funds without having a licensed teacher on staff. In some cases, the director may have been licensed, but they were not the ones providing instruction. Ultimately, many individuals who began the provisional process did not complete it. These factors likely contributed to the end of the pilot program.

The Current Challenge: My request to you this morning is that, whatever legislation is passed, you ensure that public school superintendents have no role in the private preschool provisional licensing process. This practice is extremely problematic, as it creates liability for both the Superintendent and the Public School District.

Statutorily, public school superintendents have no oversight or authority over private preschool programs.

How the Process Works Now: I often receive emails or phone calls from employees at private preschool centers in Colchester requesting that I sponsor their provisional license. It is important to note that, in the vast majority of cases, I do not know these individuals. I did not interview them, I did not hire them, I do not observe them, and I do not evaluate them. I cannot provide feedback to improve their practice because I have no authority over their program.

Yet, the current process requires a public school superintendent to essentially sponsor their license. When I receive these requests, I decline them. Personally, I will always decline because I must protect Colchester taxpayers from liability and protect my own educator's license.

While some superintendents do choose to sponsor these licenses, I believe it opens them and their districts to significant risk. The vast majority of superintendents are extremely uncomfortable with this. Those who do sponsor usually do so because there are limited preschool options in their community; they fear that if they don't, the center will close. These superintendents are acting reluctantly out of a sense of duty to local families; they do so because there is no other path, and your Superintendents should not be placed in this position.

Why Change is Necessary. Superintendents lack the authority and the capacity to take on this supervision.

Consider an extreme example: if a private preschool has a significant incident involving a student that results in a lawsuit or investigation.

- **Financial Liability:** In the event of a lawsuit, I do not want public school taxpayers to be responsible for those costs.
- **Administrative Burden:** During an investigation, a superintendent would likely have to participate in hearings regarding a system and an employee they neither know nor oversee.
- **Licensing Risks:** Under the current system, a superintendent's own license could technically be in jeopardy because they sponsored the provisional license of the individual under investigation, as there are currently no protections for Superintendents.

I would hope the agency would not punish a Superintendent for something they have asked us to do, and I will note there are currently no protections for Superintendents or taxpayers.

Proposed Solution: My hope is that the Child Development Division (CDD) becomes the sponsoring body for individuals seeking preschool educator provisional licenses in private settings.

Janet McLaughlin (Deputy Commissioner of the CDD) and Andrew Prowten (Assistant Director of Education Quality at the AOE) are currently collaborating on this topic. They will be making a proposal to the VSBPE for the CDD to sponsor these licenses. This is the correct move, as the CDD already has oversight authority and can hold these programs accountable.

I strongly encourage you to ask Andrew and Janet to testify on this matter.

Conclusion: Superintendents cannot hold private preschool programs accountable. We simply have no authority in this arena, and the legislative framework should reflect that reality. Preschool is important, and high-quality preschool instruction and educators are essential. We just need to ensure that the right agency with the right expertise and authority is overseeing licensure to ensure that standards and high accountability are in place.

Thanks you.

Amy Minor