



Vermont Association for the  
Education of Young Children

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To: Members of the House Committee on Government Operations and Military Affairs

Re: H.472, OPR bill section relating to the licensure of early childhood educators

From: Sharron Harrington, Executive Director, Vermont Association for the Education of  
Young Children

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Additional Materials: H.472 VTAIEYC Testimony Slides 5.6.2025 (attached separately)

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Good afternoon. I am Sharron Harrington, Executive Director of the Vermont Association for the Education of Young Children (VTAIEYC). I am joined today by my colleague, Susan Titterton, the Project Coordinator for the initiative to establish an early childhood education profession.

VTAIEYC is a non-profit organization that is the largest membership organization for early childhood educators in the state, and we are the state affiliate of the National Association for the Education of Young Children (NAEYC), one of the country's leading early childhood education organizations. As a national organization, NAEYC's key role is to promote high-quality early learning for each and every child, birth through age 8, by connecting practice, policy, and research.

In Vermont, VTAIEYC works to advance equity and excellence in early childhood education. Our organization's vision is that Vermont's children thrive and realize their true promise in supportive communities. We also partner with the Child Development Division to administer a broad range of programs and services for early childhood educators. These resources are foundational to our system's readiness for licensing early childhood educators

Thank you for the opportunity to testify today on H.472 also known as S.119 and the Vermont Office of Professional Regulation's (OPR) recommendations for licensing early childhood educators. OPR's Sunrise Review Report responds to an application VTAIEYC submitted in April 2024, which resulted from a multi-year, workforce-led initiative. We are here to share why our state's early childhood education workforce requested professional recognition.

## Defining Early Childhood Education and Who We Are Regulating

You may hear both “child care” and “early childhood education.” But what are we really talking about? Tammie Hazlett, a family child care program owner in Thetford and a leader in this work, put it best:

**“We call some programs child care and we call some programs preschool or pre-k, but **early childhood education is what happens in every quality program, no matter where it is set or what ages are taught.**”**

Our goal, and I feel confident this is shared by everyone here, is that Vermont’s youngest children are cared for so they are safe, comfortable, happy, have lots of opportunities to learn and explore and make friends, and are ready when they start kindergarten.

## Where Young Children Are

Young children participate in early childhood education in a variety of settings. The Child Development Division of the Department for Children and Families (CDD) regulates family child care home programs and center-based programs—both nonprofit and for-profit. This bill proposes to license the teachers working in these regulated programs.

Public pre-K programs are regulated by both CDD and the Agency Of Education (AOE). The AOE has an established licensure system that aligns with the standards in H.472. If an educator holds an AOE license with an early childhood endorsement, they automatically qualify for ECE licensure through the Office of Professional Regulation (OPR). It’s complementary, not parallel. This alignment ensures clear career pathways for those transitioning between private and public settings. That career path is an important part of the system, but it’s not balanced right now, and we will address that further in our section supporting ECE III designation.

So we’ve determined the settings where children attend child care. Most of Vermont’s youngest children are in non-public school programs regulated by CDD. All of our infants and toddlers are in these programs. Early childhood education starts at six weeks, when infants first attend child care. Right now, nobody caring for those babies needs a license. Across our state, thousands of infants, toddlers, and preschoolers, and their developing brains, are in homes and centers 40 or more hours a week. This is a glaring regulatory gap in our current system. These are the settings where OPR proposes individual licensure.

## Where Educators Are

This slide shows the differences in these settings as experienced by the early childhood educators working within them. There are approximately 6,500 early childhood educators working in nonpublic school settings. In a way, this slide also shows what we, as a society, choose to value. This is the picture Act 76 aims to right-size, so that child care is more accessible and more affordable.

Act 76 funding has helped families afford child care, and has helped CDD-regulated child care programs stabilize and stay open with Child Care Financial Assistance Program (subsidy) funding, but it still hasn't fully resolved issues of parity for highly qualified early childhood educators working in CDD regulated child care programs. That's what this legislation, and professional recognition, would do.

## **Simplifying Regulation**

Early childhood is already a complicated system, involving the Child Development Division, the Agency of Education, and now the Office of Professional Regulation. What we're trying to show is that some intuitive solutions—like why not have all of education, birth through grade 12, regulated by the same agency?—don't fit into the system we currently have. We support the regulation proposed by OPR because it fits the system we have now, and our workforce can't wait any longer for the support, recognition, and accountability that comes with professional regulation.

It may seem odd that adding another regulatory body simplifies things, but it does.

We agree with OPR's finding that early childhood education should be governed by a board of its own experts, rather than by another such as the Vermont Standards Board for Professional Educators, whose expertise is related to the larger public school system and not specifically early childhood education, as delivered across a mixed system.

Currently, CDD has many regulations for child care *programs*. That's because our system has no way of monitoring the qualifications of all the people working in those programs. It is likely that Vermont will be able to simplify the many regulations over time, once we have a regulation system focused on the *people* responsible for caring for young children. A licensed workforce could allow for unwinding some regulations.

We also note that after hearing some confusion from state professional associations for public school administrators around ECE III and potential duplication with ECE III, OPR clarified language throughout the bill, making it clear that it applies only to those for whom AOE licensure isn't applicable they work in programs regulated by CDD, and not in public PreK. So, no duplication; and with clear, collaborative messaging, minimal confusion.

## **Why A License to Practice?**

If these child care programs are already regulated, why do individual educators need licenses?

OPR's review concluded that individual licensure is necessary to protect the public from harm. And, beyond that, thousands of early childhood educators themselves expressed consensus: they want professional licensure, they understand the professional qualifications required, and they recognize the value licensure brings. There are several reasons for this.

## Clarity and Career Pathways

The current system is complicated. Licensure through OPR offers transparency and consistency across settings. Consider the nursing profession: before nursing became a licensed profession, the field was fragmented. Now, when you walk into any setting where nurses work—hospital, primary care, assisted care facility, summer camp— and you see RN or LPN on a name tag, you immediately understand their qualifications. The nursing profession is stronger as a result, with clearer career pathways and better pay.

Similarly, early childhood educators tell us that a professional licensing system would clarify career pathways, help them communicate their skills to the public, and create fairer compensation across different program types. Many describe licensure as a means of securing the professional *respect* they deserve.

## Accountability and Public Investment

Licensure is essential for public accountability. Vermont has already made historic investments in child care through Act 76 of 2023. Per Act 76, state agencies will deliver a report to the legislature in 2026 on recommended minimum pay standards for early childhood educators. With increased pay comes increased accountability, and with public funding comes public accountability. That's supported through a system of individual professional licensure.

## Three Designations: Increased Qualifications Lead to Improved Child Outcomes

Research shows that having highly qualified early childhood educators leads to better outcomes for children. This means children are less likely to need special services, are more likely to graduate high school, less likely to be incarcerated, more likely to own a home, have savings, raise their own children, and experience better health.

By ensuring consistent qualifications across all early childhood settings, we ensure that no matter what child care program a child attends, they are supported by an educator who is prepared to help them become a lifelong learner ready for kindergarten. The standards proposed for ECE I, II, and III qualifications align with national standards and Vermont public school standards, complementing—not competing with—the existing system. This creates a simple, tiered, stackable system of qualifications and accountability, and that does not currently exist.

## ECE III is Essential

I want to spend some time discussing ECE III, the lead teacher designation that requires a bachelor's degree.

The ECE III designation is receiving significant pushback from our state professional associations for public school administrators, the NEA, and recently, the AOE. The national

NEA is a leader on the national commission that created the framework for these professional designations and designed the future national profession.

The ECE III designation is embedded in national recommendations, essential to the future early childhood education profession. These national recommendations are from the Commission on Professional Excellence in Early Childhood Education. The Commission is working toward compensation parity, unified competencies, reciprocity, and practice autonomy for early childhood educators across states, systems, and programs. I want to add that these ECE I, II, and III correspond to the national movement toward early childhood educator licensure. The Senate Government Operations Committee received a [memo from the national Commission on Professional Excellence in Early Childhood Education](#), describing the thirty-six month process, convening 15 national organizations and workforce members, to come to **consensus on a national framework for an early childhood education profession, including the name early childhood educator, and the designations ECE I, ECE II, ECE III**, and a brief of the work other states are doing toward implementation.

Alignment with the national profession would allow license portability: we could hire out-of-state educators more easily.

OPR has listened to workforce feedback and in some instances, provided compromise revisions. But they are appropriately standing firm on ECE III, in our view, because from the impacted workforce, we have heard strong support for this designation. And that's because ECE III fills important gaps in our existing system, and in fact, benefits our entire mixed delivery system, including public schools, and brings Vermont in line with national standards.

## **NIEER 2024 State of Preschool in Vermont**

The National Institute for Early Education Research (NIEER) national standard of a bachelor's degree as the quality standard for a lead teacher, and that this qualification is not currently required of CDD regulated programs. ECE III, with its bachelor's degree requirement for a lead teacher and ECE I, with a CDA equivalent, moves Vermont toward national standards for high quality.

There is a huge gap between ECE II, which requires an associate degree, which is **not** the national standard for a lead teacher in child care; and AOE licensure with ECE endorsement, which requires a bachelor's degree, a portfolio process, and passing the Praxis exam.

There is also a gap for infant-toddler teachers. Infants and toddlers' brains are forming millions of neural connections, more than at any other times in their lives. They absolutely need qualified lead teachers.

The proposed ECE III designation fills these gaps. It is a designation that supports all child care settings in meeting national standards. It moves toward pay parity for qualifications. When we talk about delivering on the promise of Act 76, this is exactly what we're talking about, making

the system work to support and retain the workforce that is vital for delivering high quality child care to our families.

Public schools also stand to benefit from ECE III. If we have a highly qualified, stable child care workforce that we can retain over time, we are creating the conditions for children's best outcomes when they reach our public school system.

And public school jobs will always be competitive for early childhood educators with bachelor's degrees who want to teach pre-kindergarten. As much as we're working toward parity, it's hard to compete with the wages, benefits, health care, hours, and collective bargaining offered by public school jobs.

To be perfectly honest, ECE III sets up a stepping stone—an almost-qualified applicant pool—for our public schools. If we approach mixed-delivery with an abundance mindset instead of a scarcity mindset, if we decide that by making early childhood education an attractive career choice for future generations, then we will have a system that supports career growth across settings and sectors for anyone interested in early childhood education as a career. That is the big-hearted vision of the early childhood educators who helped shape the original workforce recommendations for this profession.

**Through Act 76, investments have already been made to elevate quality for children and families. ECE III strengthens that to ensure a well-prepared workforce in non-public school child care settings, where most of our children are. That's how we build on Act 76. And that's what's best for the children, which is what we should all be focused on.**

## **Honoring Our Workforce**

From day one, our top concern about increasing qualifications—and the number one concern among the workforce—has been avoiding unintended consequences, such as driving people out of the field or causing program closures. Our state cannot afford that.

## **Implementation Timeline - Gradual and Supported**

OPR has thoroughly addressed this concern, including a phased-in timeline and providing a renewable transition license for everyone in regulated programs who does not yet meet the OPR's recommended qualifications.

Based on feedback specifically from family child care home program owners, that transition period has been extended by two years, and a new, limited, license created, called Family Child Care Home Provider, to create a legacy option to retain the sector of our workforce who run their own home programs, but are unlikely to pursue additional qualifications to meet ECE II requirements.

Additionally, Vermont has built significant resources to support educators in increasing their qualifications. Scholarships, student loan repayment programs, and apprenticeship programs are already in place and are extremely popular. These resources ensure that early childhood educators are not burdened with the financial cost of meeting new qualifications.

## **Workforce Engagement**

We want to take a minute to tell you about where these recommendations come from, and to include a respectful request.

These recommendations were developed through years of engagement with the early childhood workforce across all settings—family child care homes, nonprofit and for-profit centers, public schools, and workforce preparation programs. Thousands of early educators participated, raising important questions and concerns that have been addressed by OPR.

## **Workforce Recommendations and H.472 (as S.119)**

By the time VTAEYC formally requested regulation from OPR, we had heard a strong consensus for becoming a recognized profession from over 1,000 survey responses from the workforce over four years. OPR’s own independent, rigorous review confirmed their recommendations—going even further to provide additional transition accommodations for the current workforce, in their report and in the latest draft of this bill.

One thing that has impressed me about OPR’s approach is that they prioritized the voices of the workforce members who will be regulated by this legislation. As the director of the only professional association for early childhood educators in our state, and with the responsibility of representing this workforce the best I can, I respectfully urge you to do the same. Please give greatest consideration to those who will be regulated under the terms of this bill—members of our child care workforce in CDD regulated programs—and why they support this bill:

Professional recognition, streamlined career pathways, parity with the public school sector of the early childhood system, accountability with transparency, and most of all, because it creates a system that leads to best outcomes for children.

If the ECE III designation were to be removed as some have suggested, we remain fragmented, and we reinforce a problematic narrative that child care is separate from education, that child care teachers are less qualified and less worthy of respect, and that education begins in public pre-k or kindergarten instead of at birth.

## **VTAEYC Supports H.472**

In fact, quality early childhood education is delivered in family homes, centers, and public schools. That’s what a mixed-delivery early childhood education system looks like. Education is delivered to infants and toddlers as well as pre-kindergarteners. It’s regulated differently in different places, but across the system, we have *educators* delivering education. Professional recognition and regulation for early childhood educators in CDD regulated programs clarifies,

simplifies, and supports every single person working in this mixed-delivery system, fills important regulatory gaps, and it is without doubt what's best for our children.

### **Closing: Support H.472**

We urge you to support H.472. Thank you for your time and consideration. We welcome your questions.