

House of Representatives  
Committee on  
Government Operations & Military Affairs

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Hello Committee Members,

My name is Tami Dodge. I am a registered child care provider in St. Albans. I have a BA in Elementary Education and Psychology. I am a licensed teacher here in the state of Vermont with an endorsement in Early Childhood Education. I have worked in regulated care, both center based programs and now in my home, for 30 years. I am also a Vermont Early Childhood Network (VECN) leader and have been a leader and mentor for my colleagues in my community for 25 years. I am writing today with concerns regarding S.206.

My first concern is for the definition of Early Childhood Educator (ECE) I.

As written an ECE I is an individual who practices early childhood education as an assistant educator in a program under the supervision of Early Childhood Educators II or III or a teacher who is exempt for this chapter and licensed by the Agency of Education with endorsements in early childhood education, early childhood special education, or elementary education.

As written, supervision is defined as on-site, direct oversight in which an Early Childhood II or III observes the practice of an Early Childhood Educator I and provides feedback, support, and direction to an Early Childhood I. When you look at **OPR's Licensure Requirements**, starting on page 8, line 10, under eligibility and qualifications, it states that an Early Childhood Educator I shall receive a certificate from an approved credential program in early childhood education requiring a minimum of 120 hours of training and instruction. According to the current **Vermont State regulations** "a registered home provider must meet the following; (7.3 Qualifications and Experience-

7.3.1) require A registered Family Child Care Provider (FCCP) that operates a registered child care home shall ensure and maintain documentation that he/she is at least 18 years of age, is a high school graduate, or has completed a GED, and meets or exceeds one of the following qualifications prior to licensure or within twelve months of initial licensure:

- (1) Vermont Career Ladder Level 1 certificate or higher,
- (2) at least successful completion of the Fundamentals for Early Childhood Professionals course
- (3) at least a current CDA (Child Development Association Credential) from the National Council for Recognition
- (4) at least a child care certificate from Community College of Vermont
- (5) at least successful completion of twelve college credits in content consistent with the core knowledge areas identified by NLCDC

The equivalent in a center based child care and preschool program (CBCCPP)

7.3.2.3) Teacher Assistant is a least 18 years of age, is a high school graduate, or has completed a GED, and meets one (1) of the following qualifications:

- (1) At least a Vermont Early Childhood Career Ladder Level One or Two certificate
- (2) At least a CDA (child development associate) and at least twelve months experience working with groups of children from grade (3) or younger
- (3) At least a State Board of Education approved Human Services Program Certificate that emphasizes child development or early childhood education and at least twelve months experience working with groups of children from grade (3) or younger.
- (4) At least successful completion of the Fundamentals for Early Childhood Professionals course of the Vermont Afterschool Essentials Certificate and a least twelve months experience working with groups of children for grade (3) or younger
- (5) At least successful completion of a three college credit course in child or human development or a three college credit course for school age care and education and at least twelve months experience working with groups of children from grade (3) or younger.

Every year these groups are required, by Vermont State regulations, to complete at least 15 hours of professional development. Programs that care for children that are in DCF custody are required to have at least 6 of the 15 hours be advanced specialized care. Programs that care for children in DCF custody are also required to be at the level 3 in the Vermont quality assurance program, Step Ahead Recognition System (STARS). I have worked with many colleagues in Franklin County on professional development and the STARS program.

**My concern is:** With the definition of ECE I, as written, anyone that wants to do this work in their home who does not have at least an associates degree, would have to have a ECE II or III on site with direct oversight. Programs, both home and center based, are having difficulties finding staff at this moment. If FCCP had to have an Associates Degree or ECE II or III on site, I believe this would reduce the workforce. A reduction would increase the gap between the number of spots available for children under the age of three and the need for care in children under the age of three. I feel that an ECE I who was an active member of the VECN or has an ECE II or III as a resource mentor would not need that person on site.

During the process of creating S.206's, the levels of ECE's were compared to the levels in nursing. Each level was based on the education of the applicant. The ECE I ( LNA), ECE II (LPN), ECE III (RN). I was recently having a conversion with a friend, who is a RN, and I can't help but look at the comparison of LNA to ECE I. A LNA is able to work in a variety of settings including working for home health, where they can go into someone's home without having a LPN or RN on site with them, yet S.206 is saying someone is not able to provide child care in their home unless they have an associates degree.

As I was discussing the details of S.206 with this friend, including the professional development currently required by our state regulations, I was asked why we were being held to a higher standard than nurses. When I asked her to explain, she informed me that, here in Vermont, nurses are not required to take continuing education classes to renew their license. I have been

made aware that some places of employment provide professional development opportunities to nurses due to traveling nurses coming from other states. I feel this is something to think about.

**My second concern is:** the time frame and cost of the renewal. The proposed renewal would be every two years. The renewal of my AOE teaching license is every three years. The renewal of my child care registration is every three years. The renewal of my STARS application is every three years. I feel a three year renewal time frame would align more with current renewal requirements in the field of early childhood. With the minimum renewal fee being \$225, I feel the two year renewal would be an expense that most current registered home providers and center based staff would struggle with without adding specific benefits to the providers.

I thank you for your time.

Sincerely,

*Tami Dodge*