



April 28, 2026

Rep. Birong, Chair
Nick Adams, Committee Assistant
House Committee on Government Operations and Military Affairs
Vermont General Assembly

Dear Chair Birong,

I am writing on behalf of the [National Association for the Education of Young Children](#) (NAEYC) to express our organization's support for S. 206 to recognize early childhood education (ECE) as a licensed profession in Vermont. With nearly 50,000 members who are early childhood educators, faculty members, students, advocates, and allies across the country, our mission is to promote high-quality early learning for each and every child, birth through age 8, by connecting practice, policy, and research. We advance a diverse, dynamic early childhood profession and support all who care for, educate, and work on behalf of young children.

Key to this mission is working with partners in a collective effort, guided by the [Unifying Framework for the Early Childhood Education Profession](#), to advance a comprehensive set of policies and investments for the ECE workforce that supports young children's learning and development. Professional licensure is one part of this vision, in service to a diverse, equitable, well-prepared, well-compensated early childhood education workforce that children, families, and businesses need to thrive.

We have been proud to be a resource for and to support VTAEYC, Let's Grow Kids Action Network, and the Office of Professional Regulation in their efforts, on behalf of early childhood educators in the state, to establish professional licensure for early childhood educators. We want to note that VTAEYC is one of 51 Affiliates in our organizational network, and that they are their own 501(c)3s, with their own voice and perspectives and expertise. VTAEYC has done deep work over the past decade in partnership with Let's Grow Kids and the many, many educators working in homes, centers, and schools with whom they have built relationships.

We are submitting this letter to describe our perspective on the goals and intent for establishing professional licensure for early childhood educators and the ways in which our shared work has been and continues to be driven by educator expertise, strengths and needs, particularly in the current and historical context. We will also provide some information about work that is happening elsewhere in the country that aligns with a vision of a reciprocal, autonomous ECE profession.

Background

Professional regulation is complex, and certainly not without challenges; but it also presents a uniquely positive option and opportunity to right some of the wrongs in early childhood education that have for too long plagued children, families, educators, and businesses, and contributed to the “failed market” that is unfortunately descriptive of our child care and early learning systems.

The child care landscape in which early childhood educators operate, in Vermont as across the country, is complex and fragmented. Unlike the public K-12 system which provides free access to education and care for all age-eligible children and youth, there is no currently existing parallel system for our country's youngest children. As a result, and by necessity, child care and early learning for children birth through age five is a mixed-delivery system with programs based in homes, centers, and schools. This system operates alongside an informal network of families, friends, and neighbors (FFN) who support children and families in need of care but are not always considered – by themselves and others – as early childhood education professionals working within a licensed system. (In Vermont, a person may provide care for children from no more than two families in addition to their own before needing to be part of the licensed system).

Early childhood education professionals – who can and do provide quality, developmentally-appropriate, and culturally-relevant education and care in homes, schools, and centers – provide an essential service in supporting each and every child in their programs to be safe, happy, healthy, and learning. Yet they are not currently or fairly recognized, supported, compensated, nor held accountable for their practice with these young children and their families – and certainly not within a professional licensure system that many members of the public rely upon to protect them, their interests, and their investments across a wide range of industries.

The quality of the ECE workforce has a direct impact on the quality of ECE in this country. For decades, though, early childhood educators have been undervalued and under-compensated. While Vermont has made strides in early childhood educator compensation over the last few years with the average wage in birth through five settings at \$18.19, the national average wage is \$14.60/hour (in birth through age five settings) and the varying qualifications, scopes of practice, and compensation within and across settings and states [undermines quality and diminishes the benefits](#) of early childhood education to children, families, and our economy. The lack of compensation, differing (and often low) expectations for qualifications, and lack of recognition as a profession is contributing to an exodus in the field. Not surprisingly, this means that child care programs are closing parts or all of their programs because they cannot find staff, or, in order to stay “staffed,” they need to hire individuals who are not adequately prepared to work with young children. In turn, this leads to more burnout among prepared and experienced educators, who also then close their programs or leave the field, worsening the cycle.

Intent of Professional Licensure in Early Childhood Education

Early childhood education is not and should not be an “anything goes” profession. We know too much about the vulnerabilities of young children, as well as the science of early learning and the essential competencies for early childhood education to feel comfortable with the “buyer beware” market that currently rules the child care landscape. The lack of equitable, affordable access to quality child care is harming young children and their families. The research is clear that the first eight years of children’s lives are critical for brain development as well as social emotional, physical, and language development. Vermont has leaned into the research and made significant progress through public investments to address access to child care in the state. Initiatives to establish professional licensure build on those investments to address the quality and stability of the ECE workforce.

Protecting the public and public investments means working to ensure a floor of quality, where parents can choose from any early childhood setting that meets their families’ needs, knowing that the individuals who are licensed to practice there have a deep understanding of how children learn and develop and have the complex skills and knowledge that support them in effectively practicing with a diverse array of young children and their families, including those with special needs.

Ultimately, we believe that professional licensure can be part of an effort to build supply rather than inhibit it, including in family child care homes, where our active goal and intention is to ensure that current and future educators working in family child care settings have equitable access to (and are not excluded from) a resourced system in which they are fairly compensated, operate with professional autonomy, and are valued and supported. We agree with the VT Office of Professional Regulation’s own analysis in its 2020 [Regulatory Assessment: State Regulations of the Occupations and Professions](#), that “the likely policy benefits to be had from formalizing and transferring individual licensing of child-care workers would come from reducing barriers to entry and streamlining requirements.” Here, we emphasize that an effort to add regulations in one area should be accompanied by an offsetting effort to lessen them elsewhere, while protecting children’s health and safety; this is the clear intent of the *Unifying Framework* and our work around licensure. As the *Unifying Framework* states: “the Task Force does not intend for [the] recommendations to be layered on top of existing state systems; rather, our vision includes the unwinding, reorientation, and realignment of some existing systems, to free up funding and focus that can be redirected toward the factor that makes the biggest difference in driving access and quality: the workforce.”

In this case, that means right-sizing the regulatory environment by putting trust and autonomy for early childhood educators – and not only the building in which they work – at the center. Professional licensure provides a way to both recognize and hold accountable early childhood educators for their practice with young children, formalizing and confirming consistent expectations for educators’ professional preparation and competencies and acknowledging educators for meeting these expectations. This will help elevate the status of early childhood

educators as a skilled profession and support recruitment into the ECE workforce. Licensure would also serve as an important form of accountability to the public to assure families that early childhood educators, fairly compensated with public dollars for the public good they provide, are competent and safe to practice with their children.

Implementation of and Alignment with the Unifying Framework

Since the release of the *Unifying Framework*, and as a member of the [Commission on Professional Excellence in Early Childhood Education](#), NAEYC's work has included efforts to support and elevate the implementation of and alignment with recommendations within it. In this work, Vermont is a leader but is not alone. There is exciting, grassroots-led progress in communities and states across the country – including but not limited to Connecticut, Delaware (which has just issued an RFP to develop an implementation plan to establish ECE professional licensure), the District of Columbia, Minnesota, Missouri, New Mexico, and Virginia – related to prioritizing policies and investments that support and develop early childhood as a respected and compensated profession aligned with the *Unifying Framework*. Here are a few examples of current areas of work that are connected to and build upon the work to develop supportive and right-sized licensing structures, and advance professional licensure:

- The [Professional Standards and Competencies for Early Childhood Educators](#) serve as the core competencies for our early childhood education profession, and adoption of these standards is underway in many states and in all parts of the profession and the infrastructure that supports it. States including Pennsylvania, Washington, Michigan, Missouri, Iowa, Rhode Island, and South Carolina have adopted them as state-wide educator competencies (which then drives alignment in ECE higher education preparation programs and professional development systems) or aligned their K-12 ECE teacher licensure requirements to them. In the hearings that the Office of Professional Regulation held in 2024, Vermont faculty spoke about how the professional preparation and development systems are reorienting around these standards.
- Connected to this, NAEYC has updated the standards in its higher education accreditation system to require that ECE degree programs align their curriculum to the *Professional Standards and Competencies* and provide evidence of student proficiency. Additionally, the revised standards also incorporate quality indicators around faculty, field experience, and program design that are named in the *Unifying Framework* as essential to high quality ECE professional preparation programs. With approximately 180 accredited ECE degree programs from the associate's to initial master's degree levels, many states – such as Alabama, Connecticut, the District of Columbia, Michigan, New Mexico, South Carolina, and Virginia – are investing in accreditation as a way to recognize preparation program quality and to provide assurance to the public that graduates of these programs are prepared to effectively work with young children and their families.
- There are efforts in states and communities – such as the District of Columbia, Florida, and

Missouri— to align their ECE career ladders and/or wage ladders to the ECE I, II and III designations in the *Unifying Framework*. This brings consistency in expectations for educators’ professional preparation and practice within and across ECE settings in their states, makes clearer for educators how they can move and grow in their careers, and supports ECE credential portability within and across states. Recognizing that it is not enough to realign their career ladders, these states are also embracing their responsibility for ensuring that there are sufficient, affordable, accessible, and high quality preparation programs in their communities to support educators in equitably meeting degree and credential expectations for the designations. To that end, they have conducted inventories of existing pathways, and are creating models to address barriers – from free tuition, to loan forgiveness, to mentorship, to coursework in Spanish, to credit for prior learning, to cohorts of early childhood educators working in family child care, and to scholarships and grants, including through T.E.A.C.H. scholarships – which as you heard in the hearings, is an important partnership and resource in Vermont.

You can find more examples of this work in our 2024 publication [Spotlight on State Actions & Investments in the Early Childhood Workforce](#) and in the Commission’s 2025 publication [State Actions Advancing the Unifying Framework: A 2025 Review](#).

Addressing Concerns Raised in the House Committee Hearing

We understand that a witness has put forward a recommendation to not use the term “early childhood educator”. We would like to provide some history behind why this term is important to the ECE profession. Early childhood education is a well-established and defined period of child development. The 2015 *Transforming the Workforce for Children Birth Through Age 8: A Unifying Foundation* (National Institute of Medicine) does an admirable job of synthesizing decades of research that documents this and that documents the specialized skills, knowledge and professional preparation required of individuals supporting the development and learning of children, birth through age 8. When NAEYC and 14 other national ECE organizations embarked on the initiative that eventually led to the [Unifying Framework for the Early Childhood Education Profession](#) (2020), we quickly realized that the first step in creating a unified vision for the profession, in collaboration with educators, was establishing our identity.¹ Thus, the first Decision Cycle of this process focused on solidifying a name (see [pp.10-13](#)) for who we are as practitioners and our specific set of responsibilities. Many terms were proposed

¹ The following national organizations representing early childhood educators working with children birth through age 8 across all ECE settings were part of the Power to the Profession (P2P) Task Force that authored the *Unifying Framework*: American Federation of State, County and Municipal Employees • American Federation of Teachers • Associate Degree Early Childhood Teacher Educators • Child Care Aware of America • Council for Professional Recognition • Division for Early Childhood of the Council for Exceptional Children • Early Care and Education Consortium • National Association for Family Child Care • National Association for the Education of Young Children • National Association of Early Childhood Teacher Educators • National Association of Elementary School Principals • National Education Association • National Head Start Association • Service Employees International Union • ZERO TO THREE

and debated. “Early childhood educator” is where we landed. As with other professions, by using this term consistently across settings and states, the hope is to support the public’s recognition of the work and role of early childhood educators and to support portability of credentials. The term addresses the specific focus of the educator’s work and indicates that there is expertise needed/held as part of this role.

We also understand concerns have been raised about including the ECE III designation in the ECE profession. We agree with VTAEYC and the Office of Professional Regulation that recognizing the ECE III designation, as described in the bill, does not duplicate nor supplant the ECE teachers license that the Standards Board operates. It is intended to recognize the large number of individuals who are not included in the purview of the Standards Board. There are many early childhood educators who hold baccalaureate degrees who work in ECE settings that are not part of the PreK-12 public school system that the Agency for Education oversees. Based on data from the Vermont Child Development Division, VTAEYC estimates that nearly half of Vermont’s current early childhood education workforce holds a bachelor’s or advanced degree. This is a significant group of individuals at the ECE III designation that if not included in a professional licensure system would also not be included in the current teacher licensure system operated by the Agency of Education. While we hope the Agency of Education would eventually consider opportunities for reciprocity between the ECE teaching credential it offers and the ECE III designation recognized under the ECE professional licensure system overseen by OPR we respect that this is an Agency decision, and that is not part of the bill before the Vermont legislature.

Finally, one of the witnesses raised a concern that regulating early childhood educators would raise the cost of child care. This is an understandable assumption, but research we have conducted over the last few years has found the opposite. Every state is facing ECE workforce shortages, and one of the most common ways states address this is by reducing staff qualifications, increasing ratios and increasing group size allowances. The assumption is that by making it “easier” to enter the ECE workforce and by reducing the number of educators needed (via increasing ratios and group sizes) that this will incentive recruitment into the workforce. In 2020, NAEYC partnered with the Center for American Progress to study the impact of decisions to deregulate child care in this way in many states. We found that the “solution” had the opposite of its intended effect. In fact, when states reduced qualifications and/or increased ratios, this led to more early childhood educators leaving the field. They were burnt out managing larger groups of children and frustrated to be working with individuals not prepared for the job. This increased early childhood educator turnover, exacerbated ECE workforce shortages, disrupted continuity of care for children, and increased the costs for child care programs. Through our research we found “no correlation between the strictness of state regulations and state levels of child care supply, indicating that more stringent regulation is unlikely to have a large impact on child care supply².” We have conducted multiple [ECE](#)

² [The Costs of Deregulating Child Care Decreased Supply, Increased Turnover, and Compromised Safety](#) (NAEYC, 2024). This resource updates the original 2020 research.

[workforce surveys](#) over the years to check in on educators' and child care programs' well-being. It is well-documented that the ECE profession and the larger ECE field has been under-resourced, under-valued, and under-financed for decades. Every state is experiencing ECE workforce shortages. When we ask early childhood educators what would incentivize them to stay, better/fair compensation is always at the top of the list, but is closely followed by better working conditions, including reasonable child/teacher ratios and colleagues/directors who are well-prepared for their responsibilities. Our research on deregulation and the ECE workforce, coupled with the *Unifying Framework*, speaks to the importance of having a regulated ECE workforce that includes clear, consistent expectations for professional preparation and that holds early childhood educators accountable to the public.

In closing, we want to emphasize three key points:

- First, Vermont has made extraordinary public investments in early childhood education – and it is important that those investments are safeguarded and protected, just like our children, families, and educators. Professional licensure is a path towards that goal.
- Second, the reality is that the status quo of the early childhood education workforce isn't working. While it is vitally important to address and mitigate concerns about the future impact of, for example, licensing fees on early childhood educators, the reality is that educators are spending valuable time and effort –often without any associated benefit to or impact on their respect, status, ability to advance in their field, or compensation, and with the added challenge that their PD engagement isn't typically portable across settings or state lines. Professional licensure is a path towards changing this reality.
- Finally, many occupations and professions have walked down the road of licensure before, and early childhood education has much to learn from them, which is why we have and will continue to engage with social workers, speech and language pathologists, architects, nurses, and others – to understand the pitfalls and create strategies to minimize them in the process of building towards a system in which the burden doesn't fall on educators alone, but rather on the system of professional preparation programs, employers and owners, states, and the federal government to provide affordable, equitable, efficient, and high-quality pathways to licensure for educators working in homes, centers, and schools.

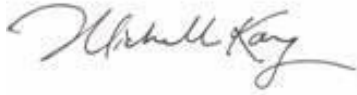
Given the uniqueness of early childhood education, and the importance of early childhood educators to children, families, and the economy, it is critical for any professional licensure pathway to be thoughtfully and intentionally designed and implemented with timelines, resources, and support that recognize both the current ECE workforce, and the future ECE profession. We appreciate how S. 206 addresses this.

We hold deep admiration and respect for the educators throughout Vermont and the leadership of VTAEYC, the Office of Professional Regulation, the Vermont General Assembly and others, for grappling with difficult questions and considerations in the course of moving this bill

forward.

We thank you for the opportunity to share our organization's perspectives.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Kang". The signature is fluid and cursive, written over a light gray rectangular background.

Michelle
Kang CEO

Appendix A: Additional Resources for Consideration

We share the following resources to support your consideration of the recommendations within it.

- [Executive Summary: Transforming the Workforce for Children Birth Through Age 8 – A Unifying Foundation](#) (Institute of Medicine, National Research Council, 2015)
- [Strengthening the Knowledge and Competencies of Early Care and Education Professionals](#) (National Academy of Sciences, 2018)
- [Increasing Qualifications, Centering Equity: Experiences and Advice from Early Childhood Educators of Color](#) (NAEYC and EdTrust, 2019)
- [Professional Standards and Competencies for Early Childhood Educators](#) (2020)
- [Unifying Framework for the Early Childhood Education Profession](#) (2020)
- [Commission on Professional Excellence Website](#) – This web site includes information on the Commission’s work and membership as well as highlights additional resources that support the implementation of the Unifying Framework.
- [Power to the Profession Website](#) – This website includes the history of the Power to the Profession movement that created the Unifying Framework and the source documents behind the recommendations in the Unifying Framework.
- [Centering Quality, Centering Equity: Lessons Learned in Increasing Early Childhood Educator Credentials](#) (The Institute for College Access & Success and the Georgetown University Center on Poverty and Inequality, 2024)
- [Compensation Means More Than Wages: Increasing Early Childhood Educators’ Access to Benefits](#) (NAEYC, 2024)
- [Spotlight on State Actions & Investments in the Early Childhood Workforce](#) (NAEYC, 2024)
- [The Costs of Deregulating Child Care Decreased Supply, Increased Turnover, and Compromised Safety](#) (NAEYC, 2024)
- [A Path Forward on Child Care Regulation Differentiating Between Harmful Deregulation and Helpful Reform](#) (Center for American Progress, NAEYC, 2025)
- [NAEYC ECE Workforce Surveys](#) (2020-present)