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Sarah Copeland Hanzas, Secretary of State
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March 10, 2026

To: Hon. Ann Cummings, Chair
Senate Committee on Finance

From: S. Lauren Hibbert, Deputy Secretary of State
Jennifer Colin, Director, Office of Professional Regulation

Re: S.206, An act relating to licensure of Early Childhood Educators by
the Office of Professional Regulation

Dear Committee Members:

Thank you for the opportunity to testify about S.206, an act relating to the licensure of Early Childhood Educators by the Office of Professional Regulation.

OPR Overview

OPR is responsible for the regulation of 53 professions in Vermont and over 80,000 individual and business licensees. OPR is a special fund agency which means it is designed to subsist on only the fees it collects. The OPR fund has been operating at a deficit, currently at approximately \$300,000. This deficit is substantially smaller than in recent years, and it has steadily improved through various cost saving measures such as reducing our building space, not filling open positions immediately, and changing allocations for administrative services provided by the Secretary of State's office. OPR is operating at a deficit for several reasons, primarily: (1) our funding model was designed in the 1970's and has not evolved to take into account the cost of IT systems required to handle the volume of applications and the quick turn around time that is expected; and (2) implementation of licensure compacts, which result in VT losing license fees, though we still bear responsibility for enforcement costs for compact licensees while they work in the state. As a result of its deficit, OPR was asked to conduct a money study in the 2024 session. We submitted an interim report and are in the process of gathering more data. Our final report will be submitted by January 1, 2027.

S.206 Early Childhood Educators - Summary

S.206 adds Early Childhood Educators to OPR professions. The bill creates a tiered licensure system for Early Childhood Educator I, II and III, a legacy license for Family Child Care Providers, and transitional licenses for individuals working toward achieving the new qualifications. These are educators working in Family Child Care Homes and Center-Based Child Care and Preschool Programs that are regulated by the Child Development Division of Department for Children and Families.

Prior to supporting this legislation, OPR conducted a Sunrise Review of this profession, which was requested by the early childhood educator workforce seeking licensure to gain professional recognition and accountability. In conducting the Sunrise Review, OPR engaged in significant research, met with stakeholders, members of the profession, state agencies, professional organizations, advocacy groups, conducted public hearings, and received public comment. OPR submitted its Sunrise [Report](#) to this body in January 2025.

At the conclusion of its sunrise work, OPR determined that early childhood educators in child care homes and child care centers regulated by the CDD should be individually regulated through licensure to:

- Ensure quality care and education of young children from ages 0 to 8 in Family Child Care Homes and Center-Based Child Care facilities;
- Reduce harms of low-quality early child care;
- Establish streamlined preparation pathways for early educators;
- Establish clearly articulated, uniform standards of practice and ethics that align with the standards in public schools;
- Require individual accountability to meet established standards;
- Close significant enforcement gaps in the current system;
- Provide families with an easily accessible platform to know the qualifications and enforcement history of early educators who are educating their young children.

Broadly, the bill increases qualification requirements for these educators, allows an 8-year transitional licensure pathway, provides a legacy pathway for current family child care home providers who do not want to transition to an ECE license, and provides a variance on educational requirements for lead teachers during the 8 year transition.

The bill exempts active AOE-licensed educators with endorsements in Early Childhood Education, Early Childhood Special Education and Elementary Education. The bill also exempts After School Program staff and staff from other settings that are exempt from CDD regulation (churches, hospitals, etc.).

S.206 Recommended Licensure Structure and Fees

S.206 proposes the following licensure structure:

- Early Childhood Educator I (ECE I)
 - Role: Assistant Teacher, Supervised by ECE II or III
 - Education: Approved credential/certificate program with 120 hours of education and training, plus experience;
- Early Childhood Educator II (ECE II)
 - Role: Lead Teacher, Supervises ECE I, Guided by ECE III
 - Education: Associate's degree in early childhood education or related field, plus experience; or
 - Associate's degree in unrelated field plus 21 college credits in early education, plus experience;
- Early Childhood Educator III (ECE III)
 - Lead Teacher, Supervises ECE I, Guides ECE II
 - Education: Bachelor's degree in early childhood education or related field, plus experience; or
 - Bachelor's degree in unrelated field plus 21 college credits in early education, plus experience;
- Family Child Care Provider
 - Legacy pathway only for current practitioners already actively licensed or registered with the CDD and in good standing;
 - No additional qualification required;
 - Created to ensure the new regulatory program does not result in the loss of workforce.

Licensure Fees (on a two-year cycle):

- ECE I - Initial Application, \$125; Biennial Renewal, \$225
- ECE II/ECE II - Transitional: Initial Application, \$175; Biennial Renewal, \$250
- ECE III/ECE III - Transitional: Initial Application, \$225; Biennial Renewal, \$275
- Family Child Care Provider: Initial Application, \$175; Biennial Renewal, \$250

When standing up a new regulatory program, OPR does not yet have the data to precisely determine the fees required to support the program. 3 V.S.A. §124 requires the cost of regulating a profession attached to OPR to be borne by the profession. For the startup of the Early Childhood Educator credentials, initial licensure fees are similar to fees for other board professions (\$115-\$285 for a two year initial cycle and \$275 for biennial renewal). The number of people in the profession will also be a factor in estimating fees. Current estimates are 5,000-6,000 licensees, which will rank ECE among our large professions. This profession will also have a large board, with 9 members. From our conversations with the Child Development Division, we know there will also be a volume of enforcement activity,

which is costly. Once we begin issuing licenses, OPR will need a couple of years regulating the profession, including a renewal year, to be able to further assess with greater precision the program needs and budget required to sustain the profession. OPR continuously addresses Board budgets and reviews fees as standard practice in all our professions, recommending to this body adjustments down or up through the OPR bill, as necessary. Sec. 5 of S.206 requires a report back to the legislature by November 1, 2031, three years after the first licenses are issued to report on the resources necessary to implement the program, the number of licensees, and enforcement data.

Additional Benefits of Licensing Early Childhood Educators in Non-Public Settings

- Return on investment of \$4-\$13 for every dollar spent on early education
- Increase school readiness for children, higher graduation rates, higher educational/professional achievement, better physical and mental health, lower rates of criminal justice interactions
- Potential future license portability to other states
- Increased pay and benefits for the workforce resulting in greater workforce stability and attracting professionals who want a career
- Improved workforce health, reduced burnout, healthier professional environments
- Increased access to early childhood education

Implementation: Timing and Resources

FY27: On passage, OPR will commence onboarding this new profession, which will include engagement with stakeholders, establishing a board, working with state partners (DCF/CDD) and Northern Lights at CCV to build and transition tracking of individual qualifications, workforce engagement, and public outreach.

For this foundational work, OPR would need authority to hire two positions as quickly as possible to engage in the onboarding work. The two positions would be:

- One full-time, classified, managerial Executive Officer for the Vermont Board of Early Childhood Educators; and
- One full-time, exempt staff attorney for the General Counsel Unit.

Sec. 6, Appropriation; Positions.

In the current draft of S.206, the appropriation requested for these two FTE positions in FY27 is \$262,000. However, we will be requesting an increase in this appropriation to \$280,000 because the funds were originally estimated for FY26 rather than FY27.

Because licensing fee revenue will not be generated until July of 2028 (i.e. beginning at the start of FY29), the first two years of funding for the positions is (and will be next session) requested from the General Fund. Once OPR receives licensing fees, those fees are expected to fully fund the program, including staff.

Future Anticipated Positions/Appropriations

In full transparency, OPR forecasts in FY28 requiring at least one additional position for this regulatory program, a full-time licensing staff employee, to be trained and onboarded in advance of licenses being issued and to assist with Board functions. In the future, there may also be a need for an additional Investigator position; however, we will not know for certain until the program launches and complaints start coming in.