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## TESTIMONY

**Testimony To:** Senate Committee on Government Operations

**Respectfully Submitted by:** Zoie W. Saunders, M.Ed.

**Subject:** H.472, An act relating to professions and occupations regulated by the Office of Professional Regulation

**Date:** May 1, 2025

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This testimony is to reaffirm the Agency's formal opinion and concerns with H.472. For over a year, the Agency of Education has maintained that the use of the term "Early Childhood Educator" should not be used for this effort. We maintain support the National Association for the Education of Young Children's (NAEYC) efforts to advance the profession, and the hard work of these professionals. In a human sense, yes, they are educators. Any working professional who supports the growth and learning of children is an educator. When we consider statutory definitions, federal regulations, and local policies and bargaining agreements, the use of "Early Childhood Educator Licensure" to describe an individual who is not a licensed teacher will lead to confusion and consequences. It is understood across the country that a licensed early childhood educator has met the minimum qualifications set forth in the [NASDTEC Interstate Agreement](#), and is qualified to teach in a public school.

While we appreciate the efforts to build technical guardrails to differentiate OPR ECE licensure and AOE ECE licensure, it still creates unnecessary confusion for families and the general public. New parents will not have the full context of these technical conversations when they see a potential provider is a "Licensed Early Childhood Educator." They will assume that this individual is a licensed teacher and they will purchase a service based on an unnecessary and easy misunderstanding.

Additionally, the added language around CDD regulation only further exacerbates concerns of duplicity with UPK programming. Confusion will occur for families and the general public because all Universal Prekindergarten (UPK) prequalified public schools, private child care programs and Family Child Care Home providers are all regulated by the Child Development Division (CDD) – in essence all UPK programs need a childcare license and therefore are "regulated" by CDD.

The Agency has offered a number of suggestions to alleviate this issue. Our preferred alternative is "Early Childhood Education Provider," as this recognizes the degree in Early Childhood Education, relies on a professional term currently in the field, and avoids the duplicative use of a term nationally recognized to describe licensed public school professional staff.



We appreciate that the Committee and Secretary of State's office have heard these concerns, and request the committee takes these concerns from the Agency, and every public education association, seriously as they consider this bill. There is a lot of merit to the bill and goal of advancing the profession, we simply ask for consideration of an alternative name to avoid unnecessary duplication and confusion in the general public.