



**TO:** Senator Brian Collamore, Chair  
Senate Government Operations Committee  
**FROM:** Vermont Council of Special Education Administrators (VCSEA)  
**DATE:** April 22, 2025  
**RE:** S.119, an act relating to licensure of early childhood educators

The Vermont Council of Special Education Administrators (VCSEA) has been active in educational leadership across Vermont for over 44 years. Our organization supports Special Education Administrators, and collaborates with state organizations and the VT Agency of Education. We stay abreast of legislative issues at both the state and federal levels. Our goal is to provide leadership, support, collegiality and mentoring to all those who teach and lead in education and special education in Vermont. We advocate for high-quality education and support for all children in Vermont.

Senate Bill S.119, proposes the establishment of a new licensure system for early childhood educators in Vermont. While the intent of this legislation—to elevate and professionalize the early childhood workforce—is commendable, the bill introduces unnecessary complexity and cost, while duplicating existing systems that already function with transparency, accountability, and effectiveness.

#### 1. Transparency: Unclear Oversight and Confusing Role Definitions

Vermont's early childhood education system is already governed by detailed and publicly accessible licensing regulations under the Department for Children and Families (DCF) and the Vermont Agency of Education (AOE). These regulations, including the Center-Based Child Care and Preschool Program Licensing Regulations, clearly outline qualifications for staff roles such as "Lead Teacher," "Teacher Associate," and "Assistant Teacher," and are familiar to providers, families, and regulators alike.

Introducing new licensure levels—Early Childhood Educator I, II, and III—under the authority of the OPR creates redundancy and ambiguity. It is unclear how these new titles interact with or replace the existing titles under DCF or AOE regulation. Furthermore, adding a third agency to oversee early childhood credentials may lead to confusion about who holds final authority over licensing, professional development, and compliance. This triple-agency structure risks reducing—not increasing—transparency for families, providers, and early educators across the state and is in direct opposition to the recommendations of the findings for a single agency to oversee Early Childhood Education.

## 2. Cost-Effectiveness: Added Expense Without Direct Benefit to Children

At a time when Vermont families are struggling with the high cost of child care, and providers are contending with limited funding and staffing shortages, the implementation of a parallel licensure system is not a cost-effective solution. The bill would require the creation of new administrative systems to process applications, verify credentials, and provide oversight—all of which would come at a financial cost to the state, and ultimately taxpayers. For providers and educators, the cost would be felt in the form of new educational requirements, additional credentialing fees, and potential time away from classrooms to meet licensing mandates.

Consider a small rural program currently operating within all state regulations, staffed by experienced educators with degrees, training, and evaluation in early childhood education. Under this bill, those staff may be required to obtain a separate license through the OPR, incurring both time and financial burdens, despite already meeting DCF's qualifications and demonstrating quality practice. These costs would be better invested in direct support like wage supplements, tuition assistance, and accessible, high-quality professional development—resources that help children and educators alike without creating new bureaucratic hurdles.

## 3. Confusion: Misaligned Structures and Unintended Consequences

S.119 proposes a licensure model patterned (but not exactly mirroring) after K–12 education that does not reflect the realities of early childhood settings. The proposed requirement that an Early Childhood Educator I must be supervised by an ECE II or III is especially problematic for small programs, where staff structures are flat and everyone plays a leadership role. These roles are already well-defined under the current system, and imposing new tiers may result in programs being unable to legally staff classrooms, even with competent and qualified professionals.

The state already has an effective framework in place for career progression and training through the Northern Lights at CCV system, which supports educators with a clear pathway of professional development tailored to early childhood. Rather than building a parallel system through the OPR, Vermont would be better served by reinforcing and investing in this existing model through DCF and AOE.

## 4. Child Find Requirement in the Individuals with Disabilities Education Act (IDEA)

Passing S.119 as currently proposed could negatively impact Child Find by creating additional barriers to early identification and referral of children with potential developmental delays or disabilities. The increased regulatory and financial burdens on early childhood providers, especially those in underserved or rural areas, may result in workforce shortages or program closures. These outcomes would directly hinder timely identification and support for children in need of early intervention services, thereby undermining the goals of Child Find and the federal

requirements outlined in the federal Individuals with Disabilities Education Act (IDEA) compliance. Additionally, by shifting oversight to a new board that does not explicitly require assessors to hold a Vermont educator license or comparable higher education credentials, the bill could reduce the quality and consistency of developmental assessments used in Child Find. Individuals responsible for conducting assessments must have a strong foundation in child development, special education law, and instructional strategies—knowledge typically gained through higher education and teacher licensure. Without clear qualifications aligned with those standards, there is a risk that assessments will be conducted by individuals without the necessary expertise, potentially delaying or misidentifying the needs of children entitled to early intervention or special education services under IDEA.

While VCSEA fully supports efforts to recognize and uplift early childhood educators as professionals, we urge the committee to consider that Vermont already has a transparent, cost-effective, and functional system for ensuring quality in early childhood education. S.119, though well-intentioned, introduces unnecessary confusion and expense without a clear pathway to improved outcomes for children or educators. Strengthening and resourcing the systems we already have would be a more practical and impactful route.