

TO: Hon. Brian Collamore, Chair
Senate Government Operations Committee

FROM: Sue Ceglowski, Vermont School Boards Association
Jay Nichols, Vermont Principals Association
Chelsea Myers, Vermont Superintendents Association
Jeff Evans, Vermont Curriculum Leaders Association
Mary Lundeen, Vermont Council of Special Education Administrators
Jeff Fannon, Vermont-National Education Association

DATE: March 26, 2025

RE: S.119, an act relating to licensure of early childhood educators

The executive directors of the public education associations listed above are writing to respond to S.119, an act related to the licensure of early childhood educators. The bill's purpose is to “*require the licensure of early childhood educators.*” Please know that the licensure of early childhood educators is already a requirement. While we agree that individuals providing child care should have ongoing training in planning and implementing intentional, developmentally appropriate learning experiences that promote the social-emotional, physical, language, and cognitive development and health of each child, we oppose a license of “early childhood educators” through the Office of Professional Regulation (OPR).

First, Early Childhood Educators are a well-established profession, requiring an educator license through the Vermont Agency of Education. Here are some of the requirements for an AOE-licensed ECE:

- Child Development and Learning
- Family-Teacher Partnerships & Community Connections
- Child observation, documentation, and assessment
- Developmentally, culturally, and linguistically appropriate teaching practices
- Knowledge, application, and integration of academic content in Early Childhood Curriculum
- Professionalism as an Early Childhood Educator
- Inclusion
- Practicum
- Required testing (Praxis exam)

Second, the bill does not align with the priorities of transparency, equity and quality, cost efficiency, and consistency, as outlined in the governor’s Transformative Plan.

Transparency: The AOE provides an endorsement area titled “Early Childhood Educator. Another license through another regulatory agency (OPR) will result in

confusion and a lack of transparency of education and training. In the Sunrise Review Application, there is a note about the Vermont Agency of Education expressing concern about terminology —specifically, the use of “educator,” “early childhood educator,” and “licensure” as potentially confusing, misleading, and duplicative (page 62).

Equity and Quality: Because the criteria required for licensure through the OPR differs from the criteria required by the AOE (see AOE Educator Quality Division, ECE licensing regulations attached), there will be differences in the preparation of the educator. The bill also lacks strong accountability measures for ongoing professional development and supervision by highly-qualified and licensed education leaders. The lack of ongoing staff professional development within Vermont’s Universal Prekindergarten programming has been a longstanding concern, as reported annually by the National Institute of Early Education Research:



Vermont Quality Standards Checklist

Policy	Requirement	Benchmark	Meets Benchmark?
Early Learning & Development Standards Benchmark	Comprehensive, aligned, supported, culturally sensitive	Comprehensive, aligned, supported, culturally sensitive	<input checked="" type="checkbox"/>
Curriculum Supports Benchmark	Approval process & supports	Approval process & supports	<input checked="" type="checkbox"/>
Teacher Degree Benchmark	BA (public); BA for lead teacher, AA for classroom teacher (nonpublic)	BA	<input type="checkbox"/>
Teacher Specialized Training Benchmark	ECE, CD, Elem. Ed. with ECE, ECE SpEd	Specializing in pre-K	<input checked="" type="checkbox"/>
Assistant Teacher Degree Benchmark	HSD	CDA or equivalent	<input type="checkbox"/>
Staff Professional Development Benchmark	6 credit hours/5 years (teachers); 15 hours/year (assistants); PD plans; Coaching (public and some nonpublic)	For teachers & assistants: At least 15 hours/year; individual PD plans; coaching	<input type="checkbox"/>
Maximum Class Size Benchmark	20 (3- & 4-year-olds)	20 or lower	<input checked="" type="checkbox"/>
Staff to Child Ratio Benchmark	1:10 (3- & 4-year-olds)	1:10 or better	<input checked="" type="checkbox"/>
Screening & Referral Benchmark	Vision, hearing, health & more	Vision, hearing & health screenings; & referral	<input checked="" type="checkbox"/>
Continuous Quality Improvement System Benchmark	Structured classroom observations; Data used for program improvement	Structured classroom observations; data used for program improvement	<input checked="" type="checkbox"/>

Source: NIEER (retrieved 3/25/2025 from <https://nieer.org/yearbook/2023/state-profiles/vermont>)

Cost Efficiency: The bill includes an appropriation of \$1,400,000 for five new permanent positions at the Office of Professional Regulation at a time when the federal government is slashing money ear-marked for the states and the legislature is reacting responsibly to those cuts. The state can ill-afford to spend additional sums of money to replicate an existing licensure process.

Consistency: This alternate pathway to early childhood educator licensing provides no consistency with the current process to attain and maintain an AOE issued ECE license. It circumvents the current process by duplicating work in a third regulatory agency that affects early education (AOE, DFC-CDD, and now a proposal of OPR). The bill also creates the Vermont Board of Early Childhood Educators, which is duplicative of the Vermont Standards Board of Professional Educators (VSBPE)¹. Again, we reiterate the concern, initially raised by the Agency of Education, that the use of the term “educator,” “early childhood educator,” and “licensure” is potentially confusing, misleading, and duplicative.

Third, we find it very concerning that the bill proposes the prohibition of any individual use the title of early childhood educator unless the individual is licensed under this proposal or under an AOE license, yet this very bill aims to allow individuals to use the title and hold a license as early childhood educators, through a different set of criteria and a separate process than that already in existence. Licensing educators is outside of the jurisdiction of OPR, as noted on their website:

OPR regulates the professions listed above. Below you will find the links to professions that are outside of OPR’s jurisdiction.

- Plumbers and Electricians – [Department of Fire Safety](#)
- Teachers and Educators – [Agency of Education](#)
- Medical Doctors – [Board of Medical Practice at the Vermont Department of Health](#)
- Attorneys – [Professional Responsibility Board](#)

In conclusion, we are very concerned that S.119 will result in a lack of transparency, higher costs, more bureaucracy, greater confusion, inequity, and potentially decreased quality of education for our youngest learners.

We respectfully request the opportunity to provide testimony in response to this bill. We further urge you to hear from the Vermont Standards Board for Professional Educators and the AOE’s Office of Educator Licensing.

¹ The Vermont Standards Board for Professional Educators (VSBPE) is a 13-member, teacher majority, policy-making board appointed by the Governor. The Board’s purpose is to oversee the training, licensing and professional standards of teachers and administrators. Its overarching goal is promotion of educator quality. Vermont Standards Board for Professional Educators | Agency of Education

5440-36 Early Childhood Education

(Revised March 2023)

The holder is authorized to teach young children birth through PK, PK through grade three, or birth through grade three, as specified on the endorsement.

1. Child Development and Learning in Context: Early childhood Educators base their practice on a deep understanding of early child development. Early childhood Educators:
 - 1.1. 1.1. Understand the developmental period of early childhood from birth through age 8 across physical, adaptive, cognitive, social and emotional, and linguistic domains, including bilingual/multilingual development.
 - 1.2. 1.2. Understand and value each child as an individual with unique developmental variations, experiences, strengths, interests, abilities, challenges, approaches to learning, and with the capacity to make choices.
 - 1.3. 1.3. Understand the ways that child development and the learning process occur in multiple contexts, including family, culture, language, community, and early learning setting, as well as in a larger societal context that includes structural inequities.
 - 1.4. 1.4. Use this multidimensional knowledge—that is, knowledge about the developmental period of early childhood, about individual children, and about development and learning in cultural contexts—to make evidence-based decisions that support each child.
2. Family–Teacher Partnerships and Community Connections: Early childhood Educators understand that successful early childhood education depends upon Educators' partnerships with the families of the young children they serve. Early childhood Educators:
 - 2.1. Understands family systems theory and principles of family centered practice.
 - 2.2. Know about, understand, and value the diversity of families.
 - 2.3. Collaborate as partners with families in young children's development and learning through respectful, reciprocal relationships and engagement.
 - 2.4. Use community resources to support young children's learning and development and to support families, and build partnerships between early learning settings, schools, and community organizations and agencies.

3. Child Observation, Documentation, and Assessment: Early childhood Educators understand that assessments are used to guide practice and individualize instruction. Early childhood Educators:

- 3.1. Understand that assessments (formal and informal, diagnostic, formative and summative) are conducted to make informed choices about instruction and for planning in early learning settings.
- 3.2. Know a wide range of types of assessments, their purposes, and their associated methods and tools.
- 3.3. Use screening and assessment tools in ways that are ethically grounded and developmentally, ability, culturally, and linguistically appropriate in order to document developmental progress and promote positive outcomes for each child.
- 3.4. Build assessment partnerships with families and professional colleagues.

4. Developmentally, Culturally, and Linguistically Appropriate Teaching Practices: Early childhood Educators understand that teaching and learning with young children is a complex enterprise, and its details vary depending on children's ages and characteristics and on the settings in which teaching and learning occur.

- 4.1. Understand and demonstrate positive, caring, supportive relationships and interactions as the foundation of Early Childhood Educators' work with young children.
- 4.2. Understand and use teaching skills that are responsive to the learning trajectories of young children and to the needs of each child, recognizing that differentiating instruction, incorporating play as a core teaching practice, and supporting the development of executive function skills are critical for young children.
- 4.3. Use a broad repertoire of developmentally appropriate, culturally and linguistically relevant, anti-bias, evidence-based teaching skills and strategies that reflect the principles of universal design for learning.

5. Knowledge, Application, and Integration of Academic Content in the Early Childhood Curriculum: Early Childhood Educators have knowledge of the content of the academic disciplines (e.g., language and literacy, the arts, mathematics, social studies, science, technology and engineering, physical education) and of the pedagogical methods for teaching each discipline.

5.1 Understand content knowledge—the central concepts, methods and tools of inquiry, and structure—and resources for each of the academic disciplines in an early childhood curriculum:

- 5.1.1 language and literacy
- 5.1.2. the arts
- 5.1.3. mathematics

- 5.1.4. social studies
- 5.1.5. science, technology, and engineering
- 5.1.6. physical education, movement, and play

5.2 Understand pedagogical content knowledge—how young children learn in each discipline—and how to use the teacher knowledge and practices described in Standards 1 through 4 to support young children's learning in each content area.

5.3 Modify teaching practices by applying, expanding, integrating, and updating their content knowledge in the disciplines, their knowledge of curriculum content resources, and their pedagogical content knowledge.

6. Professionalism as an Early Childhood Educator: Early Childhood Educators uphold ethical and professional guidelines, promote the profession, and engage in continuous reflection and improvement. Early Childhood Educators:

6.1 Identify and involve themselves with the early childhood field and serve as informed advocates for young children, families, and the profession.

6.2. Know about and uphold ethical and other early childhood professional guidelines.

6.3. Use professional communication skills, including technology-mediated strategies, to effectively support young children's learning and development and to work with families and colleagues.

6.4. Engage in continuous, collaborative learning to inform practice.

6.5. Develop and sustain the habit of reflective and intentional practice in their daily work with young children and as members of the early childhood profession.

7. Inclusion: Early Childhood Educators understand that inclusive practices benefit all children and see children with disabilities as children first. Early Childhood Educators:

7.1. Understands how to use inclusive assessments and practices (e.g. Early Multi-tiered Systems of Support, Universal Design for Learning, Ages & Stages Questionnaires, etc.) to foster positive learning outcomes for each and every child.

7.2. Are committed to collaboration with Early Childhood Special Educators, Speech and Language Pathologists, OT/PT, Early Childhood Mental Health Practitioners and/or other service providers in order to best support the needs of diverse learners in the classroom. This includes a basic knowledge of the Early Childhood Special Education referral process and ways to deliver and implement plans for children with special needs.

8. A minimum of a practicum, or the equivalent, in early childhood education at the birth-to-5 and/or 5-8 age levels, depending on the authorization sought.

For the full birth through grade 3 authorization, practica at both the birth-to-5 and 5-8 age levels are required.

9. Required Testing: Educators receiving the endorsement in the Birth - Grade 3 or PK – Grade 3 span must receive a passing score on the ETS Praxis Early Childhood Education Test: Multiple Subjects or Elementary Education test: Multiple Subjects