
TESTIMONY

Testimony To: Senate Government Operations

Respectfully Submitted by: Tammy Bates, Agency of Education Early Education Program Manager, Vermont Agency of Education

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Subject: S.119, Early Childhood Educators as a Profession

Date: March 27, 2025

Thank you for the opportunity to share our concerns and feedback related to S.119, an act relating to the licensure of early childhood educators. We are here today representing the Early Education and Educator Licensing teams at the Vermont Agency of Education (AOE).

Background

The Agency of Education acknowledges and supports the intent of this bill to advance early childhood educator licensure, ultimately aiming to improve the quality of early care and education in Vermont and elevate the profession.

We share the goal of ensuring that each and every child in Vermont has access to high-quality early education experiences, and we recognize that well-prepared and supported educators are essential to achieving that goal. The Agency of Education has historically utilized resources and recommendations from the National Association for the Education of Young Children (NAEYC) in the development of standards for Early Childhood Education. For example, in the most recent revision of the Early Childhood Educator endorsement in Spring 2023, the Vermont Standards Board for Professional Educators utilized "The Professional Standards and Competencies for Early Childhood Educators" published by NAEYC to ensure that the endorsement is aligned to National Standards.

However, we also have concerns on how this bill may impact existing early educator licensing, and may require amendments to Act 166, the current Universal PreKindergarten Law. Additionally, there are federal requirements governing the public setting that must be considered.

Considerations and Feedback

Universal PreKindergarten (UPK) provides Vermont families with publicly-funded prekindergarten education for three, four and five year olds who



are not currently enrolled in Kindergarten. UPK is funded by school districts budgets and voluntary for families and programs including public schools or center based child care programs. All UPK programs must meet State quality criteria to participate. State Board of Education Rule Series 2600, Prekindergarten Education requires specific educator qualifications across both public and private settings. Considerations should be made as to how this bill may impact the teacher qualification requirements of Act 166, Universal Prekindergarten.

While it is nationally recognized, in Vermont “educator” is defined in [16 V.S.A. § 1691a](#) as “any teacher, administrator, or professional support staff requiring a license. The bill aims to protect the title “early childhood educator” and ensure that only qualified individuals are using it, However, it may create greater confusion to the field as a whole if two separate entities are licensing “Early Childhood Educators.”

The Agency’s Education Quality Division administers licensure oversight of professional educators working in public schools, which includes Early Childhood Educators. These rules and regulations are established through the [Vermont Standards Board for Professional Educators](#) (VSBPE). Last spring the VSBPE penned a letter to OPR expressing concerns with the proposal, specifically ECE III. The primary concern was that this would create confusion and redundancy in the field.

Office of Professional Regulation (OPR) were receptive to those concerns and have been a valued partner in the conversation over the past year. The Agency is grateful for their recommendation to exempt AOE Licensed ECE educators from OPR ECEIII requirements, while maintaining OPR Licensed ECEIII does not necessarily meet the requirements of AOE licensure. OPR staff also effectively detailed the rationale for increased oversight in the private setting.

The Agency’s primary concern with S.119 as written is the authorization of ECEI and ECEII license holders in the public setting. In the Scope of Practice section, ECE I are, “authorized to serve on an early childhood education team for children birth through eight years of age in any setting...” (page5, lines 17-19). ECE II are authorized to “in a public education setting for children in prekindergarten through grade three, serve in a support role (page 6, lines 10-11, and lines 20-21.” This age and grade range references extend beyond early childhood education programing and opens up a number of considerations in terms of Federal, State, and Local laws, rules, and policies.

One such example: it is unclear what the definition of a “support role” is, however one can presume this would be a paraeducator position. Title I of the Elementary and Secondary Education Act has specific requirements for paraeducator qualifications in schools tied to funding, which ECEI does not meet. An ECEII would already meet this requirement today by holding an associate’s degree.