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Dear Chair Collamore and Members of the Senate Committee on Government Operations,

Thank you for your work on S.206 and your attention to Vermont's early childhood workforce. The VPA supports the goal of strengthening this workforce and ensuring high-quality care and education for our youngest learners. Our concern is that, as drafted, S.206 creates two parallel licensure systems with overlapping titles that do not reflect the very different levels of preparation behind those titles. There are important differences in educator preparation, and the public deserves clear information about them.

Vermont already licenses Early Childhood Educators through the Agency of Education (AOE) under Title 16 for public school and prequalified partner PreK programs. These licenses sit within the broader educator system and typically require a bachelor's degree in education, a state-approved preparation program, supervised student teaching, and passing licensure exams. By contrast, the proposed OPR Early Childhood Educator I–III structure would allow people to hold the same “educator” title with far less required coursework and clinical experience, especially at the entry levels.

For families, the core issue is not whether someone is “licensed,” but what that license represents in terms of education and preparation. The proposed OPR Early Childhood Educator I–III structure allows entry at much lower levels of preparation (for example, 120 training hours for ECE I, and an associate degree or bachelor's in any field plus a smaller set of ECE credits for ECE II/III), even though the word “educator” is the same. Parents deserve to know which is which when they are choosing a program for their child.

If both groups are called “Early Childhood Educators,” the public will understandably assume they have gone through equivalent levels of training and professional gatekeeping. In reality, an AOE-licensed Early Childhood teacher has completed a more extensive, rigorous and standardized preparation process, aligned with PK–12 educator standards, than is required by the OPR license. Families deserve clear, honest information about that difference so they can understand when their child is with a teacher whose preparation matches expectations for Vermont’s licensed K–12 educators, and when they are with an early childhood professional who may be on a different, still-developing pathway.

We are not asking you to devalue the non-public workforce or halt professionalization. We are asking you to ensure that titles and communications accurately reflect the meaningful differences in the depth of education and training. Clear, differentiated titles and plain-language explanations would help families recognize when they are choosing a setting led by an AOE-licensed teacher and when they are choosing a setting led by an OPR-licensed child care provider at a different level on the ladder.

For principals and districts managing universal PreK partnerships, this clarity matters as well. They will be asked to explain to families why some preschool teachers are licensed under AOE, others under OPR, and what that means for quality, accountability, and portability of credentials. Without clear titling and communication, the dual system will make those conversations harder and may unintentionally erode trust in both systems.

The VPA respectfully urges the committee to consider amendments that would:

- Avoid placing two indistinct “Early Childhood Educator” licensure systems side by side in statute without clear, differentiated titles that families and districts can understand.
- Require explicit coordination among AOE, OPR, and CDD on titling, communication, and complaint pathways so families receive simple, accurate explanations of what each credential means and who oversees which educators.

Thank you for your consideration and for your ongoing work on behalf of Vermont's children, families, and educators.

Sincerely,

Erica McLaughlin

Vermont Principals' Association