

Comments on S.206

February 9, 2026

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Deputy Commissioner
Child Development Division



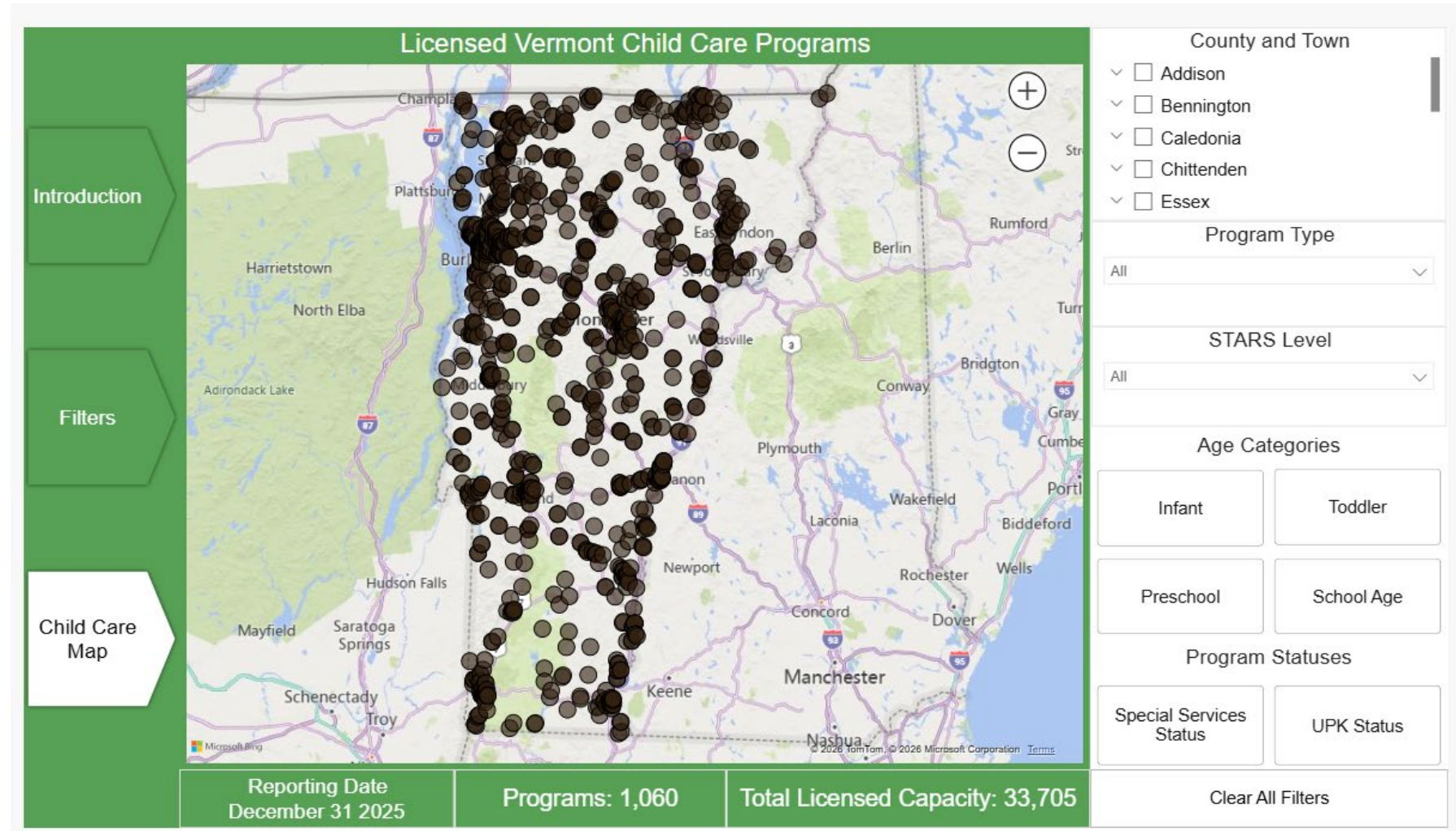
Regulated Child Care in Vermont

1,060 regulated child care programs in Vermont

- 509 Center-Based Child Care and Preschool Programs (CBCCPP)
- 401 Registered and Licensed Family Child Care Programs (FCCH)
- 150 Afterschool Programs (ASP)

33,705 is the current licensed capacity

- 19,644 in CBCCPP
- 4,056 in FCCH
- 10,005 in ASP



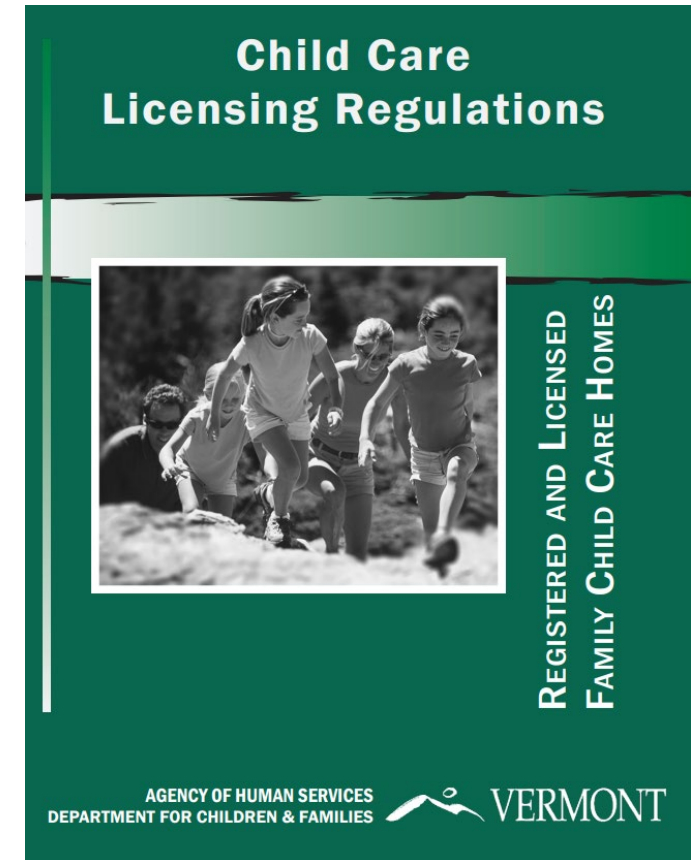
<https://dcf.vermont.gov/cdd/families/find-care/map>



Child Care Licensing Regulations

“A person providing care for children from more than two families other than their own must be registered or licensed in accordance with these regulations.”

- CDD regulates all child care facilities in the state that don't meet an exemption under 33 V.S.A. § 3502.
- Regulations provide foundation of health and safety for the healthy development of young children.
- Regulations are driven by federal and state statutes or rules, and best practices standards from American Academy of Pediatrics.



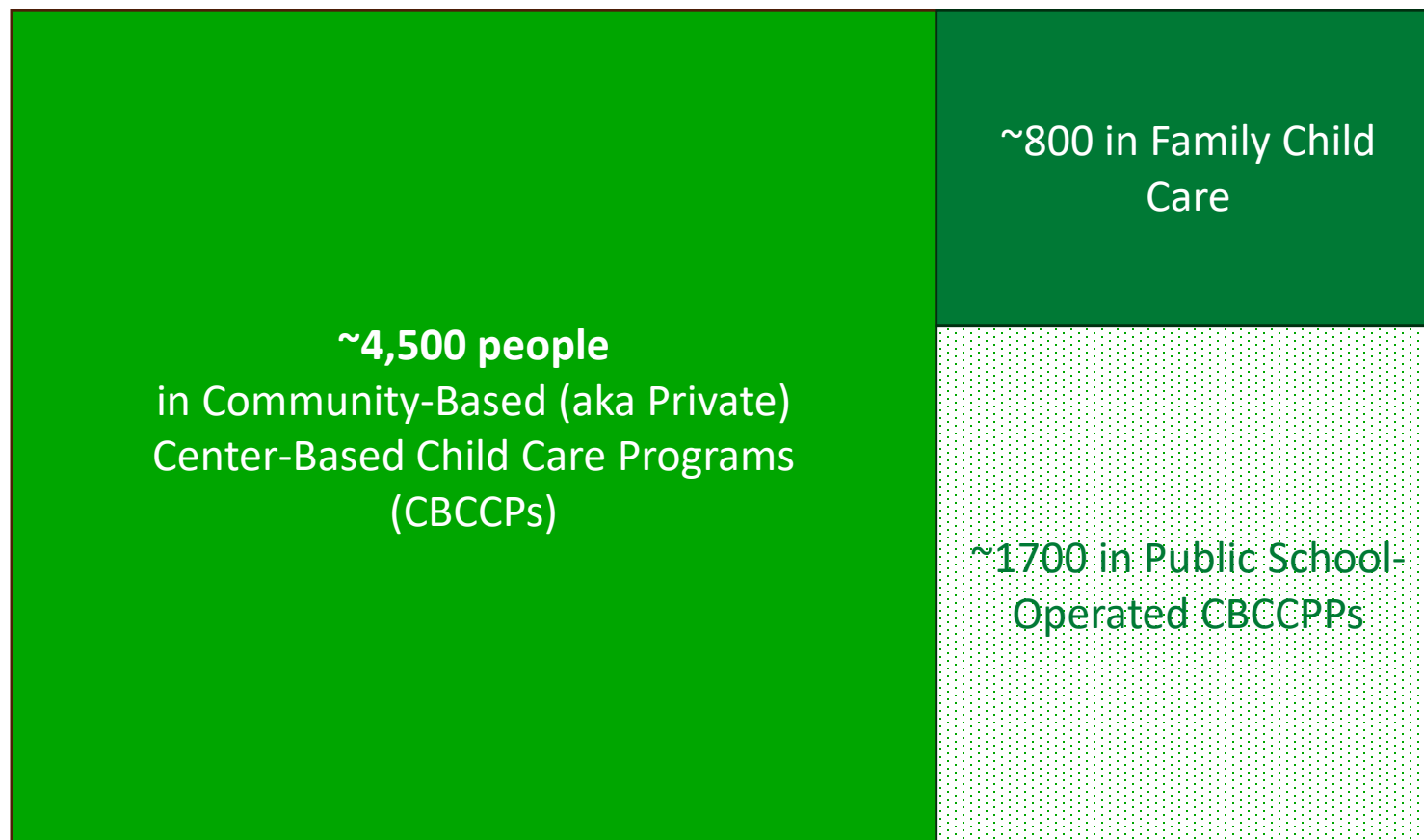
Individuals within Child Care Licensing

Right now:

- CDD approves and monitors who is working in all regulated child care programs.
- CDD approves individuals to work in specific roles based on standards laid out in Child Care Licensing Regulations.
- We contract with Northern Lights at CCV (NL@CCV) to verify qualifications, professional development hours, and required trainings to inform approvals to work in specific positions and to maintain compliance with state and federal standards.

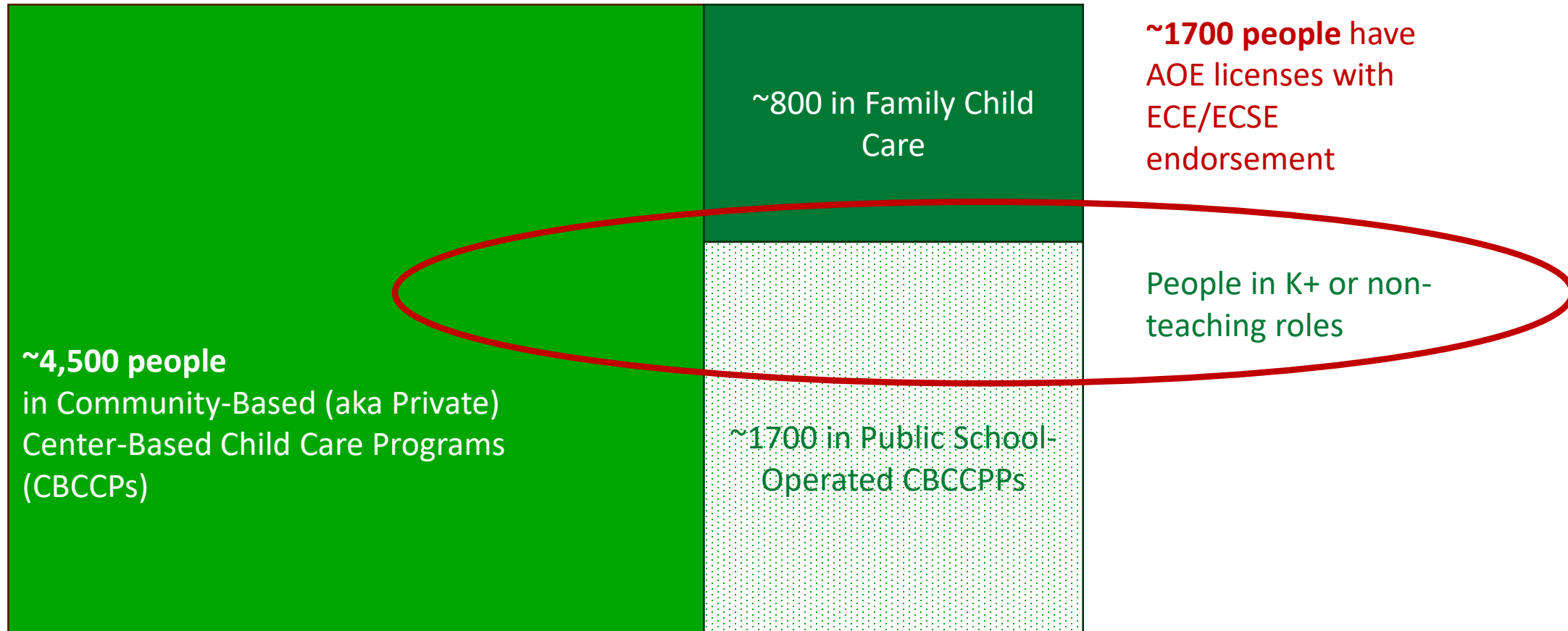
This bill will require major changes in CDD's role and approach related to ECE staff.

This bill could impact ~7,000 people working in ECE



~7,000 people work in ECE in regulated child care settings.

Those with AOE licenses with ECE/ECSE would be exempt.



Decision-making: Implications for CDD and regulated child care

Changes in decision-making authority: Moves decision-making on qualifications from a CDD-led rulemaking process to an OPR-supported oversight board.

CDD observations:

- Aligns with processes for teachers and other professions
- Ensures decisions are made by those with relevant credentials
- Leverages OPR expertise and existing OPR systems for professional licensing
- Limits role for CDD in setting rules, granting variances, responding to concerns

Transparency and Accountability: Implications for CDD and Regulated Child Care

Increases accountability and transparency: Makes qualifications clear and public

CDD observations:

- Provides clear, consistent, publicly-available information about those serving young children
- Leverages OPR processes to make unprofessional conduct easier to identify and address
- Provides clear standards for higher education and CTEs
- Could be confused with different AOE credentials
- Will require CDD to revise Child Care Licensing Regulations to align scope of practice and qualifications

Increased qualifications: Implications for CDD and Regulated Child Care

Increases educator qualifications: Increases qualifications for all child-serving roles in alignment with national Unifying Framework for ECE Profession.

CDD observations:

- Aligns with evidence on quality ECE and child development, national best practices, and national ECE competencies
- May allow CDD to simplify licensing regulations and regulatory practice in the future
- Will require additional post-secondary work (and expenses) for some currently in the field and those considering entering; may deter some from entering or growing in field
- May support retention and reduce turnover
- Builds on CDD's existing ECE workforce development efforts
- Difficult to predict impact of these new requirements as either burden or as a support

Additional Observations

- AOE has raised valid concerns about confusion of naming this license “Early Childhood Educator” and the ECE abbreviation; an alternative title of Early Childhood Education Professional and abbreviation of ECEP seem reasonable.
- The current proposal does not include an option for “transitional licenses” for those entering into the field (after the initial period). This option would likely be valuable for those who are changing careers and could start contributing right away but may benefit from time/support to complete the steps needed to earn their license from OPR.
- This transition will require significant work for CDD. CDD would need adapt its Licensing Regulations and practices, adjust its workforce registry and monitoring functions, and adapt/expand its workforce development initiatives to prepare the workforce for these changes.