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At the 3/28/2024 Vermont Standards Board for Professional Educators (VSBPE) was made aware of VTAEYC's Advancing ECE as a Profession initiative and request to the Vermont Office of Professional Regulation (OPR) to establish ECE I, ECE II, and ECE III credentials. The VSBPE and AOE licensing team have not been included in these conversations and have several concerns with the ECE III certification request.

The Vermont Standards Board for Professional Educators (VSBPE) has statutory authority with respect to the licensing of teachers and administrators working in Vermont public schools, which includes Early Childhood Educators (ECE) and Early Childhood Special Educators (ECSE). Act 166 requires all prequalified prekindergarten programs employ or contract with a licensed Early Childhood Educator to access state funds. In short, all "ECE III" level educators, in both public schools and Act 166 funded private providers are required to hold licensure through the Vermont Agency of Education, which administers VSBPE licensure rule.

The VSBPE supports the overarching goals of Advancing ECE As a Profession and has historically utilized resources and recommendations from the National Association for the Education of Young Children (NAEYC) in the development of standards for the ECE and ECSE endorsements. In the most recent revision of the ECE endorsement in Spring of 2023, the VSBPE utilized "The Professional Standards and Competencies for Early Childhood Educators" published by NAEYC to ensure the VSBPE endorsement is aligned with the "ECE III" leveling initiative. It was the understanding of the VSBPE and AOE staff that advocates in Vermont and sister Agencies were in discussions to develop "ECE I" and "ECE II" credentials that would support early childhood professionals who may eventually seek a bachelor's degree and educator license through the AOE. The VSBPE supports the development of ECE I and ECE II credentials for early childhood professionals without a bachelor's degree outside the Agency of Education; the VSBPE cannot, however, support the development of a new ECE III credential outside of AOE.

The development of an ECE III credential or license outside the Agency of Education would be redundant and only reduce access to the profession. The VSBPE and AOE would be statutorily obligated to continue licensure for Early Childhood Educators and Special Educators in public schools and prequalified private providers. If a separate "ECE III" credential is required through OPR, individuals would need to hold and maintain two licenses. While dual licensure through OPR and AOE currently exists for School Nurses and Speech Language Pathologists, professions which staddle both medical and educational professions, dual licensure for ECE and ECSE would not be appropriate. These added costs and bureaucracy will only increase inequity for rural, low-income, and 1st generation college going Vermonters entering the profession.

A license outside of AOE would not only confuse individuals but would also lead to consequences around local collective bargaining agreements and teacher retirement. Individuals may spend

significant time and money seeking one license, only to find they are ineligible to participate in these aspects of the teaching profession. This is already a common occurrence for graduates of online non-licensure education programs. These predatory programs often target students from marginalized populations such as rural Vermonters who live far away from Vermont colleges.

The VSBPE is committed to advancing the educator profession as a whole and increasing access and diversity. Over the past several years, the VSBPE has revised policies to be more equitable, licensed 88 Early Childhood and Early Childhood Special Educators through the Peer Review Process, and is a willing partner in this space. The prospect of ECE I and II credentialing is exciting and promising, however ECE III is already covered through existing statute and administrative rule through the VSBPE. If OPR does move forward with ECE credentialing, the VSBPE respectfully asks for the scope to be limited to the ECE I and ECE II levels to avoid confusion and administrative redundancy.

Sincerely,

The Vermont Standards Board for Professional Educators