



Jeffrey C. Riley  
Commissioner

# Massachusetts Department of Elementary and Secondary Education

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## MEMORANDUM

**To:** Members of the Board of Elementary and Secondary Education  
**From:** Jeffrey C. Riley, Commissioner  
**Date:** April 19, 2022  
**Subject:** Proposed Amendments to Regulations on Vocational Technical Education, 603 CMR 4.00, concerning Educator Licensure Requirements

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As part of our effort to strengthen and diversify our pipeline of qualified Massachusetts educators, I am proposing amendments to the Career/Vocational Technical Education (CVTE) educator licensure regulations that would permit certain applicants to rely on passing their professional licensure exams to demonstrate their subject matter knowledge, rather than requiring those candidates to take a separate written/performance exam administered by the Department of Elementary and Secondary Education. I am presenting the proposed amendments to the Board of Elementary and Secondary Education for initial review at your April 26 meeting. With the Board's approval, the Department will solicit public comment on the proposed amendments, which I plan to bring back to the Board for final approval in June.

### Background

Applicants for CVTE educator licensure must, as applicable, meet requirements listed in [603 CMR 4.07\(2\)](#) and [603 CMR 4.13\(3\)](#). These regulations require candidates to demonstrate subject matter knowledge in their technical field. For 21 of the 50 CVTE fields, the Department requires candidates to possess a Massachusetts, federal, or industry license/certificate to work in that technical area. Among those 21 fields, many professional licensing organizations require individuals to pass a subject matter test(s) to obtain their professional trade license. For example, to obtain a license from the Board of Registration of Cosmetology and Barbering, an individual must first pass the Massachusetts State Board Exam for Cosmetology/Barbering to demonstrate their subject matter knowledge. The Department requires candidates seeking CVTE educator licensure in cosmetology to have a license issued by the Massachusetts Board of Registration of Cosmetology and Barbering.

For these technical fields, the Department's current regulations require applicants for CVTE educator licensure to both: (1) demonstrate that they have a professional license in the applicable field; and (2) pass written/performance exams to demonstrate their subject matter knowledge. Importantly, these written/performance exams do not assess the candidates' skills in *teaching*—they assess *subject matter knowledge*. In this way, the current regulations require these candidates to prove the same body of knowledge twice.

In connection with our continuing work to strengthen and diversify the Massachusetts educator workforce, I am proposing amendments to the CVTE educator licensure regulations that would allow applicants to meet the subject matter knowledge requirement through their professional licensure exams rather than having to take a separate written/performance exam administered by the Department. These applicants would still have to satisfy the following regulatory requirements:

- Minimum education level (high school diploma, associate's degree or bachelor's degree, depending on the field for which the license is sought);
- Possession of the professional trade/industry license;
- Minimum employment experience in the field of the license sought; and
- Passing score on either the Vocational Technical Literacy Skills test or the Communication and Literacy Skills test.

The proposed regulatory amendment would not only eliminate redundant requirements, but also save candidates hundreds of dollars associated with taking separate written/performance exams, as well as increase the pool of qualified, licensed candidates for CVTE schools. The proposed amendment also aligns with the Department's ongoing efforts to modernize the existing CVTE teacher testing program, with goals of improving access to test registration, increasing frequency of test administration, and lowering test fees. The Department is also planning to align the test development process with the CVTE curriculum frameworks review process, so that both can better keep pace with evolving labor market conditions and industry standards.

As the demand for qualified CVTE instructors increases in a competitive job market, the proposed regulatory changes will help incentivize strong candidates to enter the education field.

With the Board's approval, the Department will solicit public comment on the proposed regulatory amendments. After reviewing all the comments and determining whether further changes are needed, I plan to bring the amendments back to the Board in June 2022 for final adoption.

A redlined version of the regulations is attached, along with a motion to solicit public comment on the proposed amendments. Cliff Chuang, Senior Associate Commissioner, Liz Bennett, Associate Commissioner for College, Career, and Technical Education, and Brian Devine, Director of Educator Licensure, will be at the April 26 meeting to answer your questions.

Enclosure: 603 CMR 4.00 – strikethrough version of relevant portion of regulations showing amendments  
Motion

**Vocational Technical Education Regulations, 603 CMR 4.00  
Proposed Amendments Relating to Vocational Technical Teacher Licensure**

This document shows the proposed amendments to 603 CMR 4.00 by ~~striketrough~~ (language deleted) and underline (new language). The proposed amendments would permit the Department to accept certain professional licensure exams as evidence of subject matter knowledge, without requiring candidates to take additional Department-administered written/performance exams.

The full regulations can be found at: [603 CMR 4.00: Vocational Technical Education - Education Laws and Regulations](#). The proposed amendments are to 603 CMR 4.07(2)(d) and 4.13(3).

**Presented to the Board of Elementary and Secondary Education for initial action: 4/26/22**  
**Period of public comment: through 6/3/22**  
**Final action by the Board of Elementary and Secondary Education anticipated: 6/28/22**

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**4.07: Types of Vocational Technical Teacher Licenses, Requirements for Licensure, and Licenses Issued**

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**(2) Requirements for the Preliminary Vocational Technical Teacher License**

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(c) Massachusetts and/or federal government or industry issued licenses or certifications required by industry or government to work in the technical area and by the Department to teach the vocational technical subject matter and skills as set forth in Department guidelines.

(d) Achieving passing scores on the written and performance tests in the vocational technical subject matter and skills the candidate will teach or achieve a passing score on a test accepted by the Department that was required to obtain the license or certification required in 603 CMR 4.07(2)(c).

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**4.13: General Provisions Regarding Educator Licensure**

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(3) Additional Licenses for teachers. Teachers holding vocational technical teacher licenses may earn additional Vocational Technical licenses as follows:

New Field: Teachers holding a Preliminary or a Professional Vocational Technical license will qualify for a different license by: achieving passing scores on the appropriate written and performance tests or achieving a passing score on a test accepted by the Department that was required to obtain the license or certification required in 603 CMR 4.07(2)(c), and showing proof of appropriate employment experiences and state, national and/or industry licenses and/or certifications as required by the Department in 603 CMR 4.00.