

COMMONWEALTH OF MASSACHUSETTS

Middlesex, ss.

Division of Administrative Law Appeals

Laura Alderson,
Petitioner

v.

Docket No. CR-25-0684

Date: May 22, 2026

**Massachusetts Teachers'
Retirement System,**
Respondent

Appearance for Petitioner:

Laura Alderson, *pro se*

Appearance for Respondent:

Ashley Freeman, Esq.

Administrative Magistrate:

Kenneth J. Forton

SUMMARY

Petitioner, a vocational-technical teacher working under emergency licenses, applied to purchase vocational service under G.L. c. 32, § 4(1)(h½). To purchase the service, the prior service must be a requirement of the license the teacher holds, and Massachusetts Teachers' Retirement System (MTRS) may rely only on vocational service documented at the Massachusetts Department of Elementary and Secondary Education (DESE). 807 CMR 14.03. Since neither license Petitioner holds required vocational work experience, MTRS correctly denied Petitioner's application.

DECISION

Petitioner Laura Alderson timely appeals under G.L. c. 32, § 16(4) the decision of Respondent MTRS that she was not eligible to purchase her prior vocational service

under G.L. c. 32, § 4(1)(h½). DALA suggested that the matter could be decided on written submissions under 801 CMR 1.01(10)(c) and instructed the parties to file memoranda and proposed exhibits. Neither party objected.

On January 8, 2026, Ms. Alderson submitted her memorandum and 10 proposed exhibits. On April 2, 2026, MTRS submitted its memorandum and 4 additional proposed exhibits. MTRS also submitted a more complete copy of proposed Exhibit 9. I hereby admit the parties' 14 proposed exhibits into evidence as marked. (Exs. 1-14.)

FINDINGS OF FACT

Based on the exhibits, I make the following findings of fact:

1. Laura Alderson teaches in the Engineering Technology program at Watertown Public Schools. (Ex. 12.)
2. Ms. Alderson began her teaching career teaching mathematics full-time at Southbridge Public Schools in 2006. She became an MTRS member that year. (Ex. 13.)
3. On May 9, 2020, Ms. Alderson applied for an emergency vocational-technical teacher license from DESE. She received it in June 2020. The emergency license was valid until June 6, 2023. She subsequently renewed the annual license twice for a total of two years. The license expired on June 30, 2025. (Exs. 1, 3, 4.)
4. Ms. Alderson was also issued a vocational-technical administrator license on April 27, 2023. This license has not expired yet. (Ex. 13.)

5. Before Ms. Alderson received her vocational-technical teaching license, she worked as a Software Engineer at United Technologies Corporation in Connecticut from October 1986 to November 1995. (Ex. 2.)

6. On November 8, 2024, Ms. Alderson applied to purchase service credit for her United Technologies vocational work experience. *See* G.L. c. 32, § 4(1)(h½). She completed the application on January 23, 2025. (Exs. 6, 11, 12, 13.)

7. As part of her application, she submitted a letter from the successor owner of United Technologies confirming that she worked there as a software engineer from 1986 to 1995. In May 2020, she uploaded the letter to her DESE licensing profile. (Ex. 2.)

8. On April 2, 2025, MTRS confirmed with DESE that: (1) Ms. Alderson had not yet received her preliminary vocational-technical license (the next step in licensure); (2) she was then still teaching on an emergency license; and (3) no vocational employment was required to receive an emergency vocational-technical teaching license or a vocational-technical administrator license. (Ex. 14.)

9. In a letter dated October 27, 2025, MTRS informed Ms. Alderson that her application was denied because, according to DESE, to receive her teaching and administrator licenses she was not required to have any prior vocational experience. Because § 4(1)(h½) allows the purchase of only prior vocational employment “which was required as a condition of the member’s employment and licensure,” Ms. Alderson could not purchase her prior vocational employment. (Ex. 7.) *See also* 807 CMR 14.03.

10. On November 6, 2025, Ms. Alderson timely appealed MTRS’s decision.

CONCLUSION AND ORDER

Creditable service is one of the components that determines a retirement system member's superannuation retirement allowance. Most creditable service is derived from membership service which accrues when a public employee works for a public employer. See G.L. c. 32, § 1. However, Chapter 32 provides several opportunities for members to purchase creditable service based on different kinds of employment, most often with public employers. See *Carr, et al. v. Framingham Ret. Bd. and Pub. Emp. Ret. Admin. Comm'n*, CR-10-761, at *7-9 (Div. Admin. L. App. May 18, 2012) (listing provisions allowing purchase or grant of service credit).

This appeal has to do with one of the relatively rare provisions of the retirement law that allows certain members to purchase service credit based on employment outside the government. Under G.L. c. 32, § 4(1)(h½), any member in service of MTRS who is employed as a teacher at a vocational-technical school or a public school's vocational-technical program may purchase service credit for

any period or periods of prior work experience in the occupational field in which the member became a vocational-technical teacher *and which was required as a condition of the member's employment and licensure* under regulations of the department of education.

(Emphasis added.) MTRS promulgated 807 CMR 14.00 to more clearly define the parameters of, and documentation for, the prior work experience discussed in § 4(1)(h½). 807 CMR 14.03 provides:

The Board will rely on records of the Department of Elementary and Secondary Education in determining whether a member seeking to purchase creditable service as a licensed vocational-technical teacher has qualifying prior vocational service and, if so, how much. The years to be purchased will be the period (up to three years) reflected in Department

of Elementary and Secondary Education records as *the service qualifying the member for vocational certification*, the most recent eligible years to be purchased first. Prior trade service that is not reflected in Department of Elementary and Secondary Education records cannot be verified and cannot be purchased.

(Emphasis added.)

DALA decisions have consistently interpreted this passage to mean that MTRS limits purchasable vocational service to the required prior trade experience that DESE has documented and relied upon in issuing the member's vocational-technical teaching license. *See, e.g., Carr v. Massachusetts Teachers' Ret. Sys.*, CR-21-0060 (Div. Admin. L. App. April 5, 2024); *Hartung v. Massachusetts Teachers' Ret. Sys.*, CR-22-0194 & -0195 (Div. Admin. L. App. Oct. 27, 2023); *Amaral v. Massachusetts Teachers' Ret. Sys.*, CR-06-290 (Div. Admin. L. App. Oct. 5, 2007). The evident purpose of this requirement is to limit this special benefit to those teachers who were *required* to perform vocational-technical work to receive their licenses, and not just any teachers who happen to have vocational-technical work experience before they were licensed to teach.

In the end, this requirement is impossible for Ms. Alderson to fulfill because DESE has confirmed that the emergency vocational-technical teaching and vocational-technical administrator licenses that Ms. Alderson was issued did not require any vocational work experience at the time that she received them. *See also* 603 CMR 4.07, 4.08. (For the emergency teaching license, this was the case because DESE relaxed the work experience requirements during the COVID pandemic. For the administrator license, work as a vocational-technical teacher for three years was the only work

requirement.) Since no vocational service was required for either of her licenses, Ms. Alderson cannot purchase her prior vocational work experience.

DESE confirmed that Ms. Alderson does not hold a preliminary vocational-technical license, which *does require* documentation of vocational work experience. She is still currently working under a license that does not require proof of work experience. Ms. Alderson complains that DESE has not held a qualifying exam for the preliminary license in quite some time, so it has been nearly impossible to get her preliminary teaching license. Nonetheless, MTRS and DALA must follow the statute and regulation. *See Berrios v. Dep't of Pub. Welfare*, 411 Mass. 587, 595 (1992) (citations omitted); *Royce v. Comm'r of Corr.*, 390 Mass. 425, 427 (1983).

In an odd twist, Ms. Alderson has already uploaded proof of her work experience with DESE; her present problem, however, is that the work experience is *not a requirement* of the vocational-technical licenses she has held. If Ms. Alderson is finally granted a license—like the preliminary vocational-technical license—that requires proof of vocational-technical work experience, I presume that (1) she will make sure that proof of her required work experience is on file with DESE; (2) she will apply to purchase her work experience again; (3) DESE will communicate to MTRS that Ms. Alderson has documented the work experience; and (4) MTRS will follow the statute and its procedures and notify Ms. Alderson that she can finally purchase her work experience. *See G.L. c. 32, § 4(1)(h½); 807 CMR 14.03* (MTRS allows the purchase of service only if that service is included in DESE's records).

For the above-stated reasons, I conclude that Ms. Alderson may not purchase her vocational-technical work experience. Accordingly, MTRS's decision is affirmed.

SO ORDERED.

DIVISION OF ADMINISTRATIVE LAW APPEALS

/s/ Kenneth J. Forton

Kenneth J. Forton
Administrative Magistrate

Dated: May 22, 2026