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**Commonwealth of Massachusetts**  
**Board of Registration of Professional Engineers and Land Surveyors**

**Minutes of the July 17<sup>th</sup>, 2025 Open Meeting**

In accordance with the provisions of M.G.L. c. 30A § 20, notice is hereby given that the Board of Registration of Professional Engineers and Land Surveyors will be convening a Subcommittee meeting.

**Subcommittee Members Present Remotely:**

Paul Tyrell, PE, PLS, Chairman  
Daniel Caron, PE  
Kenneth Anderson, PLS  
Joyce Hastings, PLS  
Nancy Gould, PE  
Azu Etoniru, PE, PLS

**Subcommittee Members Not Present:**

**Members of the Public Present:**

Jayne Smith

**DOL Staff Members Present at Various Times during the Meeting:**

Cameron Lease, Executive Director  
Richard Holtz, Deputy General Counsel  
Eric Funk, Board Administrator  
Colleen Maloney, Deputy Commissioner of Boards and Policy  
Charles Kilb, Board Counsel  
Greer Spatz-Croxford, General Counsel

**Discussion Items**

1. Regulations Review
  - a. At 11:00 A.M. Executive Director Cameron Lease announced the opening of the meeting, that there was a quorum present. He provided notice that pursuant to M.G.L. Ch. 30A, § 20, the meeting would be recorded.
  - b. Chair welcomed everyone and introduced himself. Chair said that this subcommittee was convened after a request by the Governor to review the regulations of the Board of Registration of Professional Engineers and Land Surveyors (Board) to improve the regulations by eliminating barriers to business participation. Subcommittee members were asked to review regulations and come



- to the meeting with proposed changes. The Chair asked everyone to introduce themselves.
- c. Everyone on the call introduced themselves.
  - d. Chair asked Greer Spatz-Croxford to describe the suggested regulatory changes from DOL.
  - e. Greer Spatz-Croxford explained that DOL wants to be able to license professional engineers in Massachusetts if they have equivalent education from a foreign jurisdiction. The proposed language would allow the Board to enter into mutual reciprocity agreements with foreign jurisdictions, without further examination.
  - f. Chair mentioned that the National Council of Examiners for Engineers and Surveyors (NCEES) works on this issue, that there is precedence in other states.
  - g. Daniel Caron asked if such an agreement would be reciprocal.
  - h. Greer Spatz-Croxford answered yes, that would be the purpose of the agreement, because the Commonwealth wants to encourage other licensees to come here but also to issue licenses here with portability.
  - i. Azu Etoniru said that NCEES currently conducts credential evaluations, and that the Board requires a state-specific JP Exam, and many specific requirements for Land Surveyors, so how would we ensure that reciprocal licensees are qualified?
  - j. Chair said this only applies to Engineers, not Land Surveyors.
  - k. Kenneth Anderson said that he objects to applying this to Land Surveyors, but not to Engineers.
  - l. Nancy Gould asked how we would determine whether the education requirements match ours.
  - m. Greer Spatz-Croxford said the proposed language allows, but does not require, the Board to enter into mutual reciprocity agreements.
  - n. Chair added that this process has been completed in several other states, with the assistance of NCEES.
  - o. Daniel Caron said he would want NCEES to evaluate each credential for equivalency.
  - p. Greer Spatz-Croxford said that the regulatory change would allow the Board to enter into agreement, and those could have NCEES input. The big difference would be that credentials would be evaluated as a whole, and not on an individual basis.
  - q. Chair described the difference between reciprocity and comity.
  - r. Eric Funk said that the Board is not party to any reciprocity agreements. The Board has signed on to several Mutual Recognition Agreements (MRAs) and these can be distributed to subcommittee members.
  - s. Chair requested to review the MRAs at the next subcommittee meeting.
  - t. Cameron Lease confirmed.
  - u. Chair said he reviewed regulations and identified three other main tasks: (1) changes that need to be made because of incorrect regulations, (2) changes the Board may want to make because of industry changes, and (3) parts of the regulations that need further review. Chair proposed that the subcommittee go through the regulations and members make any comments about proposed changes.
  - v. Azu Etoniru asked what the time frame is for regulatory changes to be implemented, if the subcommittee suggests them.

- w. Chair responded that implementing the regulations is the job of DOL, not the subcommittee or Board.
- x. Daniel Caron asked if the subcommittee is reviewing the relevant statutes as well as the regulations.
- y. Chair said he believes the subcommittee is only reviewing the regulations.
- z. Greer Spatz-Croxford said that if the subcommittee identifies any needed statutory changes, flag them for DOL but they will have a much longer timeline for implementation, so the subcommittee should mainly focus on the regulations.
- aa. Chair moved through the chapters of 250 CMR 2.00 to 7.00.
- bb. Chair said under 250 CMR 2.04(2)(a)(1), the regulation requires the Board to hold at least two regular meetings each year, and the Board generally meets 12 times per year, should that be changed?
- cc. Greer Spatz-Croxford said two meetings is a floor, not a ceiling.
- dd. Kenneth Anderson said it may have been set a long time ago and he was fine with two meetings.
- ee. Chair said under 250 CMR 2.09, there may be new or modified definitions needed, such as for the PE Exam and the PLS Exam. Chair also said we need to figure out how to submit our proposed regulatory changes to DOL.
- ff. Greer Spatz-Croxford said that proposed regulatory changes can be submitted to the Executive Director.
- gg. Daniel Caron asked if we can get a Word document of the 250 CMR.
- hh. Charles Kilb said we can send out a Word document, please send individually to the Executive Director so we can continue to comply with Open Meeting Law.
- ii. Greer Spatz-Croxford said the focus of these proposed regulatory changes should be consistent with the Governor's request, to remove barriers to business.
- jj. Chair said that this could also be the time to address continuing education requirements. Board has repeatedly requested continuing education requirements because we consistently receive complaints because licensees are ignorant of our regulations.
- kk. Daniel Caron added that the proposed continuing education requirements are very lenient relative to other states' requirements.
- ll. Kenneth Anderson said Board members are required to take an ethics test, perhaps that could be applied to licensees.
- mm. Chair said 250 CMR 3.01(5) needs to be updated because the Board does not notify individuals of their exam results, NCEES does.
- nn. Azu said that technically NCEES is delivering exam results on behalf of the Board, so it may be correct.
- oo. Chair said it was a suggestion, we can discuss.
- pp. Chair asked Eric Funk whether the application form was being reviewed and potentially updated.
- qq. Eric Funk said that it needs to go through a full revision.
- rr. Nancy Gould said that 250 CMR 3.03(1) requires approval by at least two members of the Board, is this still accurate?
- ss. Chair said he had the same question.
- tt. Eric Funk said that when the Board met in person, all applications received a primary and secondary review by different Board members.

- uu. Colleen Maloney said her understanding is that one member reviews an application, and then the whole Board votes on it. The Board vote constitutes the second review, but it can be changed.
- vv. Chair said we should change the language.
- ww. Chair said that 250 CMR 3.04 includes the application requirements. Under the Land Surveyor application, we require a 3 year responsible charge and an oral interview, but we do not require that for Engineers, should we change that?
- xx. Nancy Gould said Land Surveying might have a more immediate effect on the public as opposed to Engineering.
- yy. Chair asked if this is creating a barrier to business.
- zz. Azu said that most colleges don't have specified surveying courses, and surveyors deal with lawyers and complicated regulations, so the oral interview requirement might be seen as necessary because the practice is more complex.
- aaa. Joyce Hastings said that the three years of responsible charge should be necessary.
- bbb. Kenneth Anderson said that because land surveying is so state-specific in Massachusetts, the oral interview requirement should be retained.
- ccc. Daniel Caron said that engineering is also very state-specific.
- ddd. Jayne Smith said that Boards of Health and Conservation Commissions are volunteers, there may not be a net to catch engineers in similar positions who are not qualified.
- eee. Nancy Gould said 250 CMR 3.05(10) discusses construction experience as engineering experience, this tends to be a grey area and might need to be adjusted.
- fff. Chair said that most construction experience applicants don't have design experience, even though construction industry does not like this regulation, the Board should keep the ability to determine this.
- ggg. Nancy Gould said 250 CMR 3.05(12) may need to be revised if the Board intends to enter into reciprocity agreements with other countries.
- hhh. Daniel Caron said that the requirement may not need to be altered because 50% work experience may still be reasonable to ask of reciprocity applicants.
- iii. Nancy Gould said 250 CMR 3.06(3) may need to be changed because the Board does not approve passing scores for the exams.
- jjj. Chair agreed.
- kkk. Chair said 250 CMR 3.06(2) may need to be changed because with computer-based exams, there have been updates.
- lll. Chair said 250 CMR 3.06(7) could be changed if the Board wants to update the allowed time, and that 250 CMR 3.06(8) may need to be updated for time frame.
- mmm. Eric Funk said that these time frames are current and accurate, but the Board could change the time frames if they want to.
- nnn. Daniel Caron said there is room for improvement in this language.
- ooo. Azu Etoniru said that this language could be clarified to be clearer.
- ppp. Charles Kilb said that the section reads to prohibit retaking the exam after two attempts, so it may need to be changed.
- qqq. Daniel Caron asked how many times the Board will allow applicants to take the exam, and that applicants can simply take the exam in another state and then apply for Comity licensure.

- rrr. Nancy Gould suggested that 250 CMR 5.03(2) could be updated to distinguish Professional Engineer stamps from sanitarian stamps and others.
- sss. Chair said we cannot regulate other industries but we will keep addressing this.
- ttt. Chair asked whether 250 CMR 5.06(3) is satisfied by the renewal application form.
- uuu. Eric Funk said yes, that the application contains an attestation section that requires the applicant to certify their compliance.
- vvv. Chair said 250 CMR 5.09(2) could be changed to remove misdemeanors, if the Board is comfortable, and asked what misdemeanors generally include.
- www. Charles Kilb said misdemeanors are distinguished from felonies in Massachusetts by the potential incarceration time, and whether incarceration would be in a prison or a jail, and offered to share a list of misdemeanors, which include similar crimes to felonies but are generally less serious.
- xxx. Chair said the 250 CMR 6.00 contains the technical standards for surveying and expects that the regulation review will not include updates to this.
- yyy. Nancy Gould said 250 CMR 7.06 could be changed to require a mandatory Board interview for a reinstatement request.
- zzz. Chair said most consent agreements require a Board interview for reinstatement, so it may already be required.
- aaaa. Eric Funk said that Board interviews tend to be written into consent agreements.
- bbbb. Chair asked Cameron Lease to distribute a Word document of 250 CMR for Subcommittee members to edit.
- cccc. Chair suggested a further meeting of the subcommittee before making a recommendation to the full Board. Chair suggested August 5<sup>th</sup> at 1:00 P.M. for a subsequent meeting.

### **Adjournment**

Documents used at the public meeting:

- Agenda