



MAURA HEALEY
GOVERNOR

KIM DRISCOLL
LIEUTENANT GOVERNOR

ASHLEY STOLBA
INTERIM SECRETARY, EXECUTIVE
OFFICE OF ECONOMIC
DEVELOPMENT

Commonwealth of Massachusetts
Division of Occupational Licensure

One Federal Street, Suite 600
Boston, Massachusetts 02110-2012

LAYLA R. D'EMILIA
UNDERSECRETARY, CONSUMER
AFFAIRS AND BUSINESS
REGULATION

SARAH R. WILKINSON
COMMISSIONER, DIVISION OF
OCCUPATIONAL LICENSURE

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

Minutes of the August 5th, 2025 Open Meeting

The following attendance was recorded:

Subcommittee Members Present Remotely:

Paul Tyrell, PE, PLS, Chair
Daniel Caron, PE
Kenneth Anderson, PLS
Azu Etoniru, PE, PLS

Subcommittee Members Not Present:

Nancy Gould, PE
Joyce Hastings, PLS

Members of the Public Present Remotely:

DOL Staff Present Remotely:

Cameron Lease, Executive Director
Eric Funk, Board Administrator
Charles Kilb, Board Counsel
Colleen Maloney, Associate Deputy Commissioner of Boards and Policy
John Moreschi, First Deputy Commissioner and Chief of Staff

Discussion Items

1. Review Mutual Recognition Agreements
2. Review DOL Proposed Regulatory Changes
 - i. Chair welcomed everyone to the discussion and asked to review DOL-proposed regulatory changes first.
 - ii. Cameron Lease displayed the DOL-proposed regulatory change and asked members to review.
 - iii. Daniel Caron asked where this change would be added to 250 CMR, and commented that the language was vague, and he would like to see the language specify that applicants under an MRA meet all other requirements for licensure.
 - iv. Chair asked whether the Board would have the authority to make determinations for licensure under this language.
 - v. Charles Kilb confirmed.



- vi. Daniel Caron asked to ensure that the education requirements are as stringent in the foreign jurisdiction as in the United States.
- vii. Kenneth Anderson said the wording is adequate as-is, it just allows the Board to enter into certain agreements, it does not require it. Adding restrictions might not make a difference.
- viii. Daniel Caron said the language is still vague.
- ix. Azu Etoniru said that the plain language of the text looks good but agreed with Daniel Caron that the Board does not want to make it any easier for foreign candidates to get a license that domestic candidates. Because Massachusetts does not have reciprocity agreements, the language should be changed to include the word "Comity," instead of "Reciprocity."
- x. Chair said that such a change would satisfy Daniel Caron's concerns.
- xi. Cameron Lease said that the language says reciprocity for a reason, the Board would be allowing foreign-licensed engineers to be licensed without any extra credential evaluation from NCEES on an individual basis, it is not a Comity application because we would be exempting those foreign engineers from the examination requirements.
- xii. Eric Funk said that our regulations currently provide for work requirements in the US, under a PE licensed in the US, for foreign applicants. The Board could review the applicant's work and determine whether they are qualified. The Board has always required that foreign applicants have a credential evaluation from NCEES. Reciprocity could be defined elsewhere in the regulations if desired.
- xiii. Daniel Caron said that helps his understanding. Who would the mutual reciprocity agreements be made with? Would they be made with jurisdictions or individuals?
- xiv. Cameron Lease said that not specifying who the Board would enter into an agreement with would retain the Board's flexibility to enter into agreements with various types of jurisdictions.
- xv. Charles Kilb agreed that the language should be flexible and should not find its hands tied in the future. Mutual reciprocity allows applicants to practice in a different jurisdiction under the same terms.
- xvi. Daniel Caron said that if an individual applies and is denied because the Board does not have an agreement with their jurisdiction, could they not petition the Board for their own mutual reciprocity agreement? It should be made clear that is not allowed.
- xvii. Chair said that changing the language could be helpful to clarify that.
- xviii. Charles Kilb said that an individual applicant coming to the Board wouldn't have authority to form a mutual reciprocity agreement because they couldn't negotiate on behalf of their jurisdiction, just themselves.
- xix. Kenneth Anderson said the wording could be changed to reference "an individual," instead of "individuals."
- xx. Chair said he does not have a problem with the language, because an individual wouldn't be able to make an agreement with the Board. The Board would have control over this.
- xxi. Kenneth Anderson said regardless, the Board still has full control over who to enter into agreements with.
- xxii. Eric Funk said that the Board currently does this, we make British engineers take exams and have their credentials evaluated. This language would exempt engineers from that exam requirement and take a look at any other components the Board wants. They would still have to apply, and their application would still have to be approved by the Board. The Board is already party to other MRAs, if

- the language was approved, applicants under those MRAs would also not need to pass exams.
- xxiii. Daniel Caron said that this language could allow us to enter an agreement with Canada.
 - xxiv. Eric Funk said the Board is already party to the bilateral agreement with Canada, but we still require them to take exams. This language would remove that requirement. There are various different MRAs the Board is already party to. This language opens up the possibility for applicants from those jurisdictions to be exempted from the exam requirement.
 - xxv. Daniel Caron asked if other jurisdictions could require American engineers to pass other requirements.
 - xxvi. Eric Funk said no.
 - xxvii. Chair said Massachusetts is relatively lenient in the path to licensure. NCEES has attempted to provide such reciprocity between US states with the Model Law Engineer status.
 - xxviii. Cameron Lease said we should discuss the difference between what happens for future MRAs and existing MRAs under the new regulatory language.
 - xxix. Charles Kilb said it wouldn't change the existing agreements, it would just give the Board additional approval authority, which is discretionary. The existing MRAs could be left as-is.
 - xxx. Chair asked whether the DOL signed on to the existing MRAs or the Board.
 - xxxi. Eric Funk said the Board is a party to the agreements because ABET represented the United States in signing on to those agreements, and the Board has accepted ABET-accredited licensure as their standard. But the language is not automatic, it opens up the opportunity for the Board to do so.
 - xxxii. Daniel Caron said this could be put into 250 CMR 3.05(12), and then a subparagraph (a) could be included to add the work requirement.
 - xxxiii. Chair said that the Board gets to make the decision under this, so they would have the authority to enter into an agreement to cover the work requirement.
 - xxxiv. Charles Kilb said placement was not included in the recommendations, and it could be put in multiple places, it perhaps would not fit in 250 CMR 3.05 because it seems it doesn't necessarily relate to experience.
 - xxxv. Azu Etoniru asked if the language could be a standalone paragraph. Since this is a regulatory change, would it have to go through the regular regulatory process.
 - xxxvi. Charles Kilb said the language can be added as a standalone paragraph in its own section, perhaps in 3.11, but then other language in 250 CMR might need to be moved around. This needs to go through the regular regulatory process. It's likely that this will be on a fast-track since it's a priority for the administration.
 - xxxvii. Cameron Lease added that the full Board would have to vote on this as well, after the subcommittee makes its recommendation.
 - xxxviii. Daniel Caron said that it should go in 250 CMR 3.01, but parts of that section might have to be rewritten.

- xxxix. Charles Kilb said that a new classification could be created, but because the language includes the word “notwithstanding,” it would override other parts of 250 CMR 3.01.
- xl. Eric Funk said that if we make other changes to 250 CMR 3.00, that would put the language under further scrutiny.
- xli. Chair asked how an applicant would apply under the MRA.
- xl.ii. Cameron Lease said that most of those details would be in the MRA.
- xl.iii. Chair asked for the subcommittee to approve the language.
- xl.iv. Daniel Caron proposed the language would be added as 250 CMR 3.01(11), and that current subsection be moved to 250 CMR 3.01(12).
- xl.v. Chair said this would likely be covered under the application revision.
- xl.vi. Eric Funk agreed.
- xl.vii. Kenneth Anderson moved to adopt the language, notwithstanding placement.
- xl.viii. Azu Etoniru seconded the motion.
- xl.ix. The motion passed by a 4-0 roll call vote. Members in favor: Paul Tyrell, Daniel Caron, Azu Etoniru, Kenneth Anderson. Members opposed: none. Members abstaining: none.
- 3. Review Member Proposed Regulatory Changes
 - i. Chair asked to consider the regulatory changes proposed by subcommittee members.
 - ii. Daniel Caron displayed his proposed changes. 250 CMR 3.01(5) could be changed to reflect that NCEES notifies FE applicants, not the Board.
 - iii. Chair said that NCEES is doing this on behalf of the Board so it may not have to be changed.
 - iv. Azu Etoniru agreed but said we could add the word “designee” or “agent” to make it clearer.
 - v. Chair said there’s nothing wrong with that but this doesn’t seem to be an issue.
 - vi. Daniel Caron said 250 CMR 3.06(8) could be changed to make it clearer how many times an applicant can take the exams.
 - vii. Eric Funk said the Board’s general policy is applicants can take the exams up to six times.
 - viii. Daniel Caron said 250 CMR 7.06 could be changed to require an applicant to appear before the Board for a reinstatement of their license.
 - ix. Daniel Caron shared Nancy Gould’s proposed regulatory changes. 250 CMR 3.03 could be changed to reflect how many members of the Board review an application before a determination is made.
 - x. Chair said that we should keep the recommendation, it’s a more accurate portrayal of the current practice. We could add language saying that the Board then would review the application.
 - xi. Cameron Lease offered to compile member proposed changes into one document so the subcommittee could review them all together.
 - xii. Chair said his phone might die soon.
 - xiii. Azu Etoniru said that the two-member review requirement could be changed if the Board met in person again.
 - xiv. Eric Funk said that this process does take into account the pre-COVID process.

- xv. Cameron Lease asked if we would retain quorum if the Chair logs off.
 - xvi. Charles Kilb said yes.
 - xvii. Chair said we have to end the meeting and schedule another meeting to continue review.
 - xviii. Subcommittee decided on August 12th at 1:00 P.M. for the next meeting.
 - xix. Azu Etoniru moved to adjourn the meeting.
 - xx. Kenneth Anderson seconded the motion.
 - xxi. The motion passed by a roll call vote of 4-0. Members in favor: Paul Tyrell, Azu Etoniru, Kenneth Anderson, Daniel Caron. Members opposed: none. Members abstaining: none.
4. Further Regulations Review

Adjournment

Documents used at the public meeting:

- Agenda
- Washington, Sydney, Dublin, and Seoul Mutual Recognition Agreements
- Proposed Changes to 250 CMR