

Date: September 5, 2025

Subject: License Renewal Guidance for Operators with Multiple Licenses

Key Terminology

For the purposes of this guidance document, see below for a list of key terminology.

- License **type** refers to Treatment or Distribution.
- License **grade** refers to the level of the license, which ranges from 1 to 4.
- Licenses can be **Full status** or **Operator-in-Training (OIT) status**.

Purpose

Some certified operators may hold multiple licenses for the same license type. These licenses may be different grade levels and may be Full or OIT status. During renewal years, operators holding multiple licenses may be unsure of which license(s) to renew. The following guidance can be used to assist operators in making the decision to renew certain licenses.

Disclaimer

This guidance document provides recommendations for operators with multiple licenses who may wish to renew only the license(s) necessary for their jobs. This guidance document can help those operators decide which license(s) to renew and which ones to let lapse. However, operators are welcome to renew and maintain multiple licenses if they so choose. Some operators may opt to hold multiple licenses because of job requirements, job mobility, pride about their hard work to obtain their licenses, or another reason. It is not the intent of this document to require operators to renew or let lapse multiple licenses.

Summary of License Renewal Guidance

Below are some general recommendations and other important information regarding license renewals:

- **If you have an OIT Grade 4 license and no education beyond high school, you cannot obtain a Full Grade 4 license without first holding a Full Grade 3 license. You should not let an OIT Grade 3 license lapse until you can upgrade it to a Full Grade 3 license.**
- **If you have multiple Full licenses, there is no benefit to keeping the lower-level full licenses, as the highest-level license exceeds the requirements for the lower-level licenses.**
- **If you hold a Full license, there is no benefit to keeping an OIT license of the same type at a lower grade level.**
- The decision regarding which OIT license(s) to keep will vary depending on the grade of system where you work and your ability to upgrade OIT license(s) to Full license(s) while working in that system.
- If you think you might be able to upgrade your license in the next few renewal cycles, it may be beneficial to keep your OIT license.
- If you choose to not renew an OIT license, you will be required to retake the examination if you need that license in the future.
- Consider the cost (money and time) of renewing your OIT license(s) versus retesting for the license(s) in the future if you choose not to renew.

Another critical reminder is that examinations must be taken and passed sequentially. For example, if your target grade level for a license is Grade 3, you must pass the Grade 1 and 2 exams first. However, you are NOT required to obtain licenses sequentially; if you meet one of the education and experience

requirement avenues listed in 236 CMR 4 (<https://www.mass.gov/regulations/236-CMR-400-certification-of-operators-of-public-water-systems>), you are able to obtain a license without holding a lower grade license first. It is the exams that must be passed sequentially. You can refer to the Education and Experience Requirements Worksheet (<https://www.mass.gov/doc/education-and-experience-requirements-worksheet-0/download>) to determine if you meet the requirements for full licensure.

Operators With Multiple Full Licenses

Operators with multiple Full licenses of the same type (Distribution or Treatment) are not required to hold active Full licenses for all grades of that type. The highest-grade Full license supersedes lower grade Full licenses. For example, if you hold Grade 2, 3, and 4 Full Treatment licenses, there is no regulatory benefit to renewing the Grade 2 or 3 licenses, because a Grade 4 Full Treatment license exceeds the requirements for lower-grade Treatment licenses.

Operators with Multiple OIT [and Full] Licenses

Operators seeking to upgrade their OIT licenses to Full status licenses can receive a Full license by meeting the education and experience requirements via one of two methods:

1. Possess a Full license for one grade lower than the target grade level and work for a Public Water System (PWS) with the same class as or higher than the current grade level for a required number of years after certification, as described in 236 CMR 4; or
2. Meet the education and experience requirements, as described in 236 CMR 4, by working in a PWS the same class as or higher than the target grade level.

If you hold more than one OIT license for the same type of license and are not sure which OIT license(s) to renew, it is important to consider the grade of the system where you are working. Depending on where you work, it may be challenging or almost impossible to obtain increasing levels of Full licensure if the grade of system you work in is less than the grade of Full license you wish to obtain. Therefore, it is often best practice to upgrade OIT licenses when appropriate, as it is often the easiest path to increasing licensure to hold a full license for a certain amount of time before applying for the next higher Full license. However, it is important to note that the grade of system where you are working greatly impacts whether you are able to obtain higher-grade Full licenses, and upgrading your OIT license to a Full license does not guarantee that you will be able to obtain a higher-grade Full license.

Please consider using the following guidance:

1. If you have a Full license for one grade level lower than your highest OIT license and you work in a system with the same class or higher as the highest OIT license, it is recommended to renew the highest Full and OIT licenses and upgrade the OIT license to a Full license once you gain the required amount of experience.
 - a. For example, if you have Full Grade 1 and 2 Distribution licenses and OIT Grade 3 Distribution licenses, it is recommended to renew the Full Grade 2 Distribution license and the OIT Grade 3 Distribution license and upgrade your OIT Grade 3 license to Full status as soon as you meet the education and/or experience requirements. You can let the lower grade Full license (in this example, the Grade 1 license) lapse.
2. If you do not have a Full license for one grade lower than the highest OIT license, the OIT license(s) you choose to upgrade or renew will depend on the system where you currently work. However, you will also need to consider any changes to the grade of system where you work, whether it be because your system's classification changes or you decide to change jobs. **It is recommended to upgrade your OIT licenses if you meet the education and experience**

requirements to obtain a full license. Once you upgrade those OIT licenses to full licenses, you can let the lower-level Full licenses lapse and renew the highest-level Full license (see *Operators with Multiple Full Licenses* guidance above). **It is then recommended to renew any OIT licenses that you cannot upgrade and work towards upgrading them.**

- a. For example, if you have OIT Grade 1, 2, and 3 Treatment licenses and work in a Grade 3 Treatment system, it is recommended to upgrade the highest OIT license for which you meet the education and/or experience requirements, and renew any OIT licenses that cannot be upgraded.
- b. For example, if you have OIT Grade 1 and 2 Distribution licenses but work in a Grade 1 Distribution system, it is recommended to renew both the OIT licenses, upgrade the OIT Grade 1 to a Full license if/when you meet the education and/or experience requirements, and work towards a Full Grade 2 Distribution license.

Important note for operators seeking Grade 4 licenses: If you have an OIT Grade 4 license and no education beyond high school, you cannot obtain a Full Grade 4 license without first holding a Full Grade 3 license. You should not let an OIT Grade 3 license lapse until you can upgrade it to a Full Grade 3 license.

Further Questions?

Please contact the Drinking Water Board at drinkingwaterboard@mass.gov if you have additional questions or would like guidance about which license(s) to renew.

Additional Resources

- Renewing your License: <https://www.mass.gov/how-to/renew-your-board-of-certification-of-operators-of-drinking-water-supply-facilities-license>
- License Renewal FAQs: <https://www.mass.gov/info-details/frequently-asked-questions-about-the-board-of-certification-of-operators-of-drinking-water-license-renewals>