

Memorandum

Date: October 10, 2025

To: PELSB Board Members

From: Steve Rollin, Rulemaking Attorney

Re: R4863 Rulemaking

Background

On April 21st, PELSB closed a 60-day request for comments on proposed rule R4863 relating to teacher licensure, license renewal, and other legislative requirements. Proposed changes include:

- implementing legislative changes that expand the exemption from a bachelor's degree requirement for licensure to include teachers seeking licensure in World Language & Culture, and the Visual or Performing Arts (pp. 11, 13, 16, 19 & 20 of the 10/3/25 draft rule);
- Adopting required components to the renewal requirement specific to American Indian history and culture (pp. 7, 14, 16, 17, 18 & 69 of the 10/3/25 draft rule);
- Streamlining certain components of the licensure via portfolio process (pp. 23-29 of the 10/3/25 draft rule);
- Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew (pp. 9, 21, 22, 67 & 68 of the 10/3/25 draft rule); and,
- Early Childhood Education (pp. 32-38 of the 10/3/25 draft rule), Ethnic Studies (pp.39-56 of the 10/3/25 draft rule), and Computer Science licensure (pp. 56-67 of the 10/3/25 draft rule).

Rule Subcommittee Revisions

In May, the Board Chair assigned three board members to review comments. The subcommittee met three times in July and recommended the following changes to the proposed rule:

Bachelor of Arts (BA) Exemption (pp. 11, 13, 16, 19 & 20 of the 10/3/25 draft rule)

- None.

American Indian History & Culture Renewal Requirement (pp. 7, 14, 16, 17, 18 & 69 of the 10/3/25 draft rule)

- None.

Portfolio Streamlining (pp. 23-29 of the 10/3/25 draft rule)

- Remove Ag Ed, Business, FACS, Work-Based Learning, and Accommodation Specialist from the requirement for a CTE core skills portfolio, as they are not required to have the CTE Core (only the "career" fields require CTE Core) (p. 25 of the 10/3/25 draft rule).

Meaningful Progress Licensure (pp. 9, 21, 22, 67 & 68 of the 10/3/25 draft rule)

- Change the definition of meaningful progress changed to reflect differing requirements in teaching programs (p. 9 of the 10/3/25 draft rule).
- Remove statements in the rule “as defined by the provider”, which limits the definition of meaningful progress (pp. 21, 22, 67 & 68 of the 10/3/25 draft rule).

Early Childhood Education Licensure (pp. 32-38 of the 10/3/25 draft rule)

- Allow variances for cooperating teacher qualifications for working in clinical experience with new ECE teachers (p. 37 of the 10/3/25 draft rule).

Ethnic Studies Licensure (pp.39-56 of the 10/3/25 draft rule)

- Change ethnic studies license from a preK-12 to a grade 5-12 license (pp. 39-47 of the 10/3/25 draft rule).
- Change ethnic studies license to a K-6 elementary level endorsement for ethnic studies (pp. 52-56 of the 10/3/25 draft rule).
- Add ethnic studies endorsement for social studies teachers grades 5-12 (pp.47-52 of the 10/3/25 draft rule).
- Add in the equivalent of social studies reading standards (pp. 47-52 of the 10/3/25 draft rule).

Computer Science Licensure (pp. 56-67 of the 10/3/25 draft rule)

- Change computer science license from a preK-12 to a grade 5-12 license (pp. 56-64 of the 10/3/25 draft rule).
- Change computer science license to a K-6 elementary level endorsement for Computer Science (pp. 64-67 of the 10/3/25 draft rule).
- Add in the equivalent of math reading standards (pp. 62-63 of the 10/3/25 draft rule).

The subcommittee’s discussion and more information are available on the PELSB website at [R4863 Rulemaking](#).

Additional Issues arose after adjournment of the subcommittee. PELSB staff recommend:

- that the requirement of demonstrating the social studies scope & sequence strands be removed (pp. 40, 48, & 53 of the 10/3/25 draft rule).
- under the ethnic studies, computer science and early childhood education licenses, that a candidate for additional licensure demonstrate they have met the standards for effective practice (pp. 33, 40, 48, 53, 57, & 64 of the 10/3/25 draft rule).
- the definition of meaningful progress should apply to candidates with an out-of-field permission (and not just Tier 2 candidates) (pp. 21-22 of the 10/3/25 draft rule).

Update Since August and September Board Meetings

At the August 15 meeting, the Board asked for a revised version of the proposed rule in order to see all the changes as one document. The Revisor’s office prepared a revised rule. An audit showed that two changes are still missing from the revised rule – the K-6 endorsement licenses in Ethnic Studies and Computer Science. The Revisor’s office has been made aware of the needed changes. In the meantime, the proposed rule wording for two K-6 endorsements is added to the Board materials for

this meeting.

At the September 19 meeting, the Board had two questions. First, on page 12.4 through 12.9 of the 10/3/25 rule draft, there is a definition of “calculating years of experience” as being the teacher of record for at least 90 student contact days. What is the background in determining this number, and what are the implications for teachers? The Minnesota legislature, in 2023, passed a law indicating that, “A probationary teacher must complete at least 90 days of teaching service each year during the probationary period.” Current PELSB licensure rules list “years of experience teaching” to determine tier levels, a lifetime substitute teaching license, and portfolio applications. The goal of this portion of the proposed rule is to match the definition of calculating years of experience to the 2023 statute. The implication under the proposed definition is that teachers will need to show only 90 days of student contact time to be able to count a full school year. Conversely, teachers who have 180 days or more of student contact time in a single school year would only be able to count one year of teaching experience.

The years of experience definition should not apply to the rules regarding teacher preparation. The 2023 legislation relates to probationary teachers trying to obtain licensure. Conversely, the teacher preparation rules relate to teacher educators and cooperating teachers, who should be held to a more stringent standard because they are training new teachers.

Second, on page 32.23 through 32.24 of the 10/3/25 rule draft, there is a strikeout of a requirement for a baccalaureate degree for teachers of early childhood education - why? The revised language reflects rule uniformity in PELSB licensure. The baccalaureate degree requirement is covered in subpart 2 by connecting to the tiered licensure rules. PELSB staff plan to request adopting this unified version in subject area licensures as each comes due for review and revision over the next several years.

See the memorandum, [4863 Rulemaking - Discussion of Questions from Board 101025.docx](#), for detailed answers to the two questions.

The Board indicated it would review the recommended changes and additional issues again at the October 10 meeting and take action.

Options

- Move to adopt the subcommittee’s recommended changes (and additional staff recommendations).
- Table for further consideration.
- Move to not adopt the subcommittee’s recommendations.