

Memorandum

Date: December 12, 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;¹
- Adopting required components to the renewal requirement specific to American Indian history and culture;²
- Streamlining certain components of the licensure via portfolio process;³
- Defining "meaningful progress," for the purpose of determining whether a teacher on a Tier 2 license can renew;⁴ and,
- Early Childhood Education, Ethnic Studies, and Computer Science licensure.⁵

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) Exemption⁶

- None.

American Indian History & Culture Renewal Requirement⁷

- None.

¹ pp. 11, 13, 16, 19 & 20 of the 10/3/25 draft rule

² pp. 7, 14, 16, 17, 18 & 69 of the 10/3/25 draft rule

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

⁴ pp. 9, 21, 22, 67 & 68 of the 10/3/25 draft rule

⁵ pp. 32-38 of the 10/3/25 draft rule, pp.39-56 of the 10/3/25 draft rule, and pp. 56-67 of the 10/3/25 draft rule

⁶ pp. 11, 13, 16, 19 & 20 of the 10/3/25 draft rule

⁷ pp. 7, 14, 16, 17, 18 & 69 of the 10/3/25 draft rule

Portfolio Streamlining⁸

- 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.⁹

Meaningful Progress Licensure¹⁰

- Change the definition of meaningful progress changed to reflect differing requirements in teaching programs.¹¹
- Remove statements in the rule “as defined by the provider”, which limits the definition of meaningful progress.¹²

Early Childhood Education Licensure¹³

- Allow variances for cooperating teacher qualifications for working in clinical experience with new ECE teachers.¹⁴

Ethnic Studies Licensure¹⁵

- Change ethnic studies license from a preK-12 to a grade 5-12 license.¹⁶
- 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 5-12.¹⁷
- Add in the equivalent of social studies reading standards.¹⁸

Computer Science Licensure¹⁹

- Change computer science license from a preK-12 to a grade 5-12 license.²⁰
- Change computer science license to a K-6 elementary level endorsement for Computer Science.²¹
- Add in the equivalent of math reading standards.²²

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:

⁸ pp. 23-29 of the 10/3/25 draft rule

⁹ p. 25 of the 10/3/25 draft rule

¹⁰ pp. 9, 21, 22, 67 & 68 of the 10/3/25 draft rule

¹¹ p. 9 of the 10/3/25 draft rule

¹² pp. 21, 22, 67 & 68 of the 10/3/25 draft rule

¹³ pp. 32-38 of the 10/3/25 draft rule

¹⁴ p. 37 of the 10/3/25 draft rule

¹⁵ pp.39-56 of the 10/3/25 draft rule

¹⁶ pp. 39-47 of the 10/3/25 draft rule

¹⁷ pp.47-52 of the 10/3/25 draft rule

¹⁸ pp. 47-52 of the 10/3/25 draft rule

¹⁹ pp. 56-67 of the 10/3/25 draft rule

²⁰ pp. 56-64 of the 10/3/25 draft rule

²¹ pp. 64-67 of the 10/3/25 draft rule

²² pp. 62-63 of the 10/3/25 draft rule

- that the requirement of demonstrating the social studies scope & sequence strands be removed.²³
- 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.²⁴
- the definition of meaningful progress should apply to candidates with an out-of-field permission (and not just Tier 2 candidates).²⁵

Recent Board Meeting Updates

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.

At the October 10 meeting, the Board had five questions that were mostly to resolve technical errors or consistency issues. However, the Board noted that the proposed computer science license included a section on

²³ pp. 40, 48, & 53 of the 10/3/25 draft rule

²⁴ pp. 33, 40, 48, 53, 57, & 64 of the 10/3/25 draft rule

²⁵ pp. 21-22 of the 10/3/25 draft rule

professional growth and identity as part of the subject matter standards. The Board questioned whether professional growth should be part of the initial licensure.

See the memorandum, [4863 Rulemaking - Discussion of Questions from Board 112125.docx](#), for detailed answers to the five questions.

The Board indicated it would review the recommended changes and additional issues again at the November 21 meeting and take action.

Options

- Finalize needed changes to R4863 and move to adopt those changes (along with earlier subcommittee and staff recommendations).
- Table for further consideration.
- Move to not adopt the subcommittee's recommendations.