

Client name James D. Daniel
Form Montana Licensing Task Force
Matter James D. Daniel - Rules
Sent February 11, 2026 at 12:34 PM
Due
Submitted February 11, 2026 at 12:34 PM

James D. Daniel

Date of birth	Company
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Montana Licensing Task Force

This Task Force was created pursuant to Executive Order 1-2026 on January 29, 2026.

Purpose of the Advisory Council

The Task Force shall provide the Governor with recommendations and strategies for the State of Montana to reform the professional occupational licensing system for the purposes of:

- identifying and removing burdens and barriers faced by licensees that are not necessary to protect the public; and
- improving access to and availability of professional services for citizens across Montana, including rural communities.

In developing recommendations and strategies, the Task Force shall seek input from Montana citizens, legislators, Montana associations whose members are licensed occupational professionals, professional licensing boards, relevant state agencies, advisory groups and researchers focused on occupational licensing, and other appropriate stakeholders as determined by the Task Force.

Public Record

Please note that all information received through this form is public record.

Which committee would you like to receive your comment?

Full Task Force
Construction Subcommittee
Barriers Subcommittee
Sunset Review Subcommittee

We want to hear from you!

We would like to receive any comments you would like the Task Force, or one of its subcommittees, to review. In addition, we are specifically looking for feedback for:

1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

General comment

What are your comments?

This is a request to continue efforts to reform licensing laws for barbers and cosmetologists and to create a modern system that allows both licensed and unlicensed practitioners to participate in our economy. Occupational licensing harms the economy and restricts millions of opportunities in our workforce, increasing costs upwards of 200\$ billion annually, whereas those freedoms for workers once existed, occupational licensing now impacts almost all American workers, and has become a great impediment to freedom, opportunity, and economic liberty in Montana as well as across the country. In this regards, efforts have been made to reform laws, hair braiders have in most states become unregulated, and we would urge lawmakers here to continue those efforts and go further so as to include many other services related to the industry. As seen in other industry's like the construction and across many states, a registration system can replace the licensing system and serve as similar protection without restricting opportunities for workers as seen in Montana, Washington, and Pennsylvania, which I would urge lawmakers to study, and we would then urge lawmakers here to adopt reforms such as these to increase opportunities and reduce the harms resulting from licensing laws. The result can better improve our economy and better utilize all of Americas talented workforce, also ensuring our markets are free and open as possible, and deem it to be a proposal worthy of consideration and worthy of maintaining our title of a nation and "land of freedom".

Client name Katharine E. Sanderson
Form Montana Licensing Task Force
Matter Katharine E. Sanderson - Rules
Sent February 11, 2026 at 10:43 AM
Due
Submitted February 11, 2026 at 10:43 AM

Katharine E. Sanderson

Date of birth		Company	Energy 1
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Mobile phone	2392273571		

Montana Licensing Task Force

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Public Record

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What are your comments?

*To: Montana Licensing Reform Task Force
From: Katie Sanderson, Electrical Engineering Group Manager, Energy 1
Subject: Request for Review of Experience Requirements for Montana PE Licensure
Date: February 11, 2026*

I am writing to provide public input to the Licensing Reform Task Force. I am an Engineer in Training license holder in Montana and would like to share my experience as an engineering professional who does not hold a traditional engineering degree. I respectfully request that the task force review Montana's current requirement of 20 years of engineering experience for PE applicants without an ABET accredited engineering degree and consider alternative pathways that allow qualified professionals to obtain a PE license in a reasonable timeframe.

According to the announcement issued to licensees, the task force is charged with identifying and recommending the elimination of unnecessary or redundant occupational licensing requirements, with a focus on improving access to the workforce and removing barriers that do not contribute to public safety. I believe my situation is an example of a requirement that may merit re-evaluation as part of this effort.

I graduated from Montana State University in 2018 with a degree in applied mathematics and a minor in history. I began my career as an electrical designer in 2019 and passed the Fundamentals of Engineering exam on June 2, 2021. I am currently the Electrical Engineering Group Manager at Energy 1, an MEP engineering and construction firm in Bozeman. Most of my design work supports high-end residential projects throughout Montana and Wyoming. My mathematics degree has provided a strong analytical background and my six years of experience have given me extensive hands-on knowledge in electrical design.

My company has been very supportive of my career goals. However, the 20 year experience requirement has prevented me from pursuing PE licensure in my home state for many years to come. As a result, I must rely on other licensed engineers within the firm to review and stamp my projects. While this ensures compliance, it slows my professional development and limits my ability to take on full responsibility for the work I already perform.

Because Montana's requirement is significantly longer than those in many other states, I have had to look at alternative paths. California allows candidates without an engineering degree to sit for the PE exam after six years of experience. This is a far more workable timeline, so I have begun planning to pursue my license in California. This approach, however, requires additional travel expenses and means that even if I pass the exam, I would initially hold licensure only in California. I would then need to apply for reciprocity in Montana. While my company is expanding its work in California and could support this path, it introduces delays and complications that would not exist if Montana offered a more accessible route to licensure for non-degree professionals.

Montana benefits from a strong and diverse workforce. Many capable engineering professionals develop their skills through experience, mentorship, and on-the-job training. My path is one example of this, and I am committed to continuing my professional growth and to meeting all requirements needed to ensure public safety. I respectfully request that the task force review the current 20 year requirement and consider alternatives such as reduced experience requirements or pathways comparable to those available in other states.

Thank you for your time and for the work you are doing to modernize Montana's licensing system. The announcement indicated that the task force will deliver recommendations to the governor by September 2, 2026, and I appreciate the opportunity to contribute my perspective as part of that process. I am happy to provide any additional information that may assist the task force in its review.

*Respectfully,
Katie Sanderson
Electrical Engineering Group Manager
Energy 1, Bozeman, Montana*

Client name Colleen Lorash
Form Montana Licensing Reform Task Force
Matter Colleen Lorash - Rules
Sent February 11, 2026 at 7:53 PM
Due
Submitted February 11, 2026 at 7:53 PM

Colleen Lorash

Date of birth	Company
Home email clorash@msn.com	Home address Laurel, MT 59044
Phone	

Montana Licensing Reform Task Force

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Construction Subcommittee
Barriers Subcommittee

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Specific person or topic

What are your comments?

Retire the Montana Crane License.

Montana recognizes national certification (like NCCCO), yet operator must still pay state fees and maintain a separate Montana credential to work legally in the state.

Reasons to Retire the State-Specific License

Redundancy with National Standards: Federal OSHA law (29 CFR 1926 Subpart CC) already mandates that all crane operators be certified by an accredited national body. A separate state license often duplicates this verification.

Workforce Mobility: State-specific licenses create "red tape" for out-of-state operators moving into Montana. Retiring the requirement would allow any operator with a Nationally Accredited Crane Certification to begin work immediately.

Cost Burden: Operators face recurring costs for both national certification and annual state renewal fees (\$50-\$150 depending on class). Traveling operators that are needed for large projects only work in the state every 2 to 3 years and incur unreasonable late fees for missing an annual renewal deadline. There is a growing effort to standardize certification across all jurisdictions to simplify compliance for operators working in multiple regions.

Client name Richard Cosner
Form Montana Licensing Reform Task Force
Matter Richard Cosner - Rules
Sent February 12, 2026 at 9:20 AM
Due
Submitted February 12, 2026 at 9:20 AM

Richard Cosner

Date of birth

Company

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Lincoln, MT 59639

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Montana Licensing Reform Task Force

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Full Task Force
Health Care Subcommittee
Barriers Subcommittee

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What are your comments?

In regard to National Certifications, State Licensing should expire or require renewal when a person's national license expires. The current state systems expire at two year intervals but National Certifications expire at different intervals and are required for State Licensing. Example: State EMT License expires every two years, but the NREMT expires at 3 years. An additional year MT license costs an EMT \$35, and is still required to renew their NREMT before their now renewed state license expires. Yes, this specific situation happened to me.

This places additional burdens on Rural EMRs, EMTs, AEMTs, Paramedics, Rural Fire and EMS, Volunteers, and anyone with National Certifications. Allowing state licensing to expire when National Certifications expire is cost saving to individuals, requires less tracking, prevents State Licensing from endorsing expired National Certifications.

An additional benefit to the Rural Healthcare System would be to allow volunteers who get licensed through a volunteer agency, Fire, EMS, or other, be allowed to License in the State for free. They already have to pay for classes, National Certification, and continued training, why not lessen the State burden for volunteers? This could also help recruit volunteers for Rural Agencies as it would benefit paid providers to volunteer with those Rural Agencies as a cost saving benefit.

Thank you for this opportunity.

Richard Cosner

Client name Shannon Grantham
Form Montana Licensing Reform Task Force
Matter Shannon Grantham - Rules
Sent February 12, 2026 at 6:44 AM
Due
Submitted February 12, 2026 at 6:44 AM

Shannon Grantham

Date of birth	Company
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Home phone 18168308921	

Montana Licensing Reform Task Force

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General comment

What are your comments?

Regarding assessing licensure and barriers to jobs: As an Occupational Therapist having been licensed in 4 states over my career, Montana has one of the easiest licensure and renewal programs in terms of low cost and low requirements for CEUs which are the main barriers to licensure renewal. When I first applied for my license in this state, it was also relatively easy. The licensure team actually responded to me and was prompt with their responses (unheard of in other states). As far as the biggest barrier to the OT profession (and I assume PT and ST), the cost of schooling seems to be the biggest barrier. I did not have parents that could pay tens of thousands of dollars for my education and would not have been able to receive my degree with the current cap on student loans recently implemented for these "non-professional" degrees. The biggest barriers to these healthcare professions is access to the schooling needed to be a well-trained professional, not the affordable and easy to acquire yearly license to practice in this state.

Client name Mary Oliver
Form Montana Licensing Reform Task Force
Matter Mary Oliver - Rules
Sent February 12, 2026 at 12:19 PM
Due
Submitted February 12, 2026 at 12:19 PM

Mary Oliver

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Phone			

Montana Licensing Reform Task Force

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Do you have a general comment or a specific person or topic for the Task Force to hear from?

What are your comments?

The application fee is very expensive. This may be prohibitive for many GCs. Please consider lowering the fee to be in line with other states. Thanks

Client name Danielle
Lemke
Form Montana Licensing Reform Task Force
Matter Danielle Lemke -
Rules
Sent February 12, 2026 at 3:04
PM
Due
Submitted February 12, 2026 at 3:04
PM

Danielle Lemke

Date of birth

Company Logan Health

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Work address 320 Sunnyview Lane
Kalispell, MT 59901

Work phone 14066078003

Montana Licensing Reform Task Force

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Barriers Subcommittee

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Do you have a general comment or a specific person or topic for the Task Force to hear from?

Specific person or topic

What are your comments?

To the Healthcare Subcommittee of the Licensing Reform Task Force,

My name is Danielle Lemke, and I am a Genetic Counselor in Montana. I am writing to urge the Task Force to maintain licensure for Genetic Counselors in our state.

While I support efforts to reduce unnecessary financial barriers—particularly the \$500 application fee, which exceeds the national average—the licensure requirement itself is essential. It protects patients by ensuring that only qualified, board-certified professionals provide complex genetic services. It is also necessary for hospital credentialing and insurance reimbursement, and it helps Montana attract and retain specialized providers, especially in rural communities.

I respectfully ask that the Task Force consider reducing licensure fees to align with national standards rather than eliminating the regulatory framework that safeguards patient care.

Thank you for your time and consideration.

*Sincerely,
Danielle Lemke, MS, CGC
Licensed Genetic Counselor*

Client name Tiana Pallister
Form Montana Licensing Reform Task Force
Matter Tiana Pallister - Rules
Sent February 12, 2026 at 2:32 PM
Due
Submitted February 12, 2026 at 2:32 PM

Tiana Pallister

Date of birth

Company Montana Association of Genetic Counselors

Home email tianajay@gmail.com

Home address Kalispell, MT 59901

Phone

Montana Licensing Reform Task Force

This Task Force was created pursuant to Executive Order 1-2026 on January 29, 2026.

Purpose of the Licensing Reform Task Force

The Task Force shall provide the Governor with recommendations and strategies for the State of Montana to reform the professional occupational licensing system for the purposes of:

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Barriers Subcommittee

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Specific person or topic

What are your comments?

To the Healthcare Subcommittee of the Licensing Reform Task Force:

My name is Tiana Pallister and I am a Genetic Counselor in Montana. I am writing to strongly urge the Task Force to maintain the current licensure for Genetic Counselors (GCs) in our state.

While I support the Governor's goal of reducing unnecessary barriers—specifically the high \$500 application fee, which is more than double the national average of \$220—the licensure itself is a vital protection for Montanans.

Eliminating GC licensure would be a significant step backward for several reasons:

Public Safety: Genetic information is highly complex. Licensure ensures that only qualified, board-certified individuals interpret these results. Without it, unqualified individuals could provide medical guidance, leading to misdiagnosis or inappropriate treatments.

Billing & Sustainability: Most healthcare systems and insurance payers require a state license for credentialing and reimbursement. Removing licensure would jeopardize the ability of Montana facilities to bill for these essential services, potentially leading to the loss of specialized jobs.

Workforce Retention: Professional licensure provides "title protection" and legal recognition. Without it, Montana becomes less competitive in attracting and retaining these highly specialized providers to our rural communities.

I ask the Task Force to focus on reducing the financial barrier (the \$500 fee) rather than removing the regulatory framework that ensures safe and professional genetic care for Montana families.

Thank you for your time and consideration.

Client name Emma Fosbinder
Form Montana Licensing Reform Task Force
Matter Emma Fosbinder - Rules
Sent February 12, 2026 at 3:14 PM
Due
Submitted February 12, 2026 at 3:14 PM

Emma Fosbinder

Date of birth

Company Logan Health

Home email efosbinder@gmail.com

Home address

Phone

Montana Licensing Reform Task Force

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Purpose of the Licensing Reform Task Force

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Barriers Subcommittee

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Specific person or topic

What are your comments?

My name is Emma Fosbinder, and I am a certified genetic counselor and resident in Montana. I am writing to urge the Task Force to maintain licensure for Genetic Counselors in our state but reduce financial barriers to application.

Licensure is essential to protecting patient safety. Genetic counseling involves complex risk assessment, interpretation of clinical genetic test results, medical management recommendations, and psychosocial counseling. Licensure ensures that only qualified, board-certified professionals with appropriate graduate education and supervised clinical training are permitted to provide these services. Without licensure, patients can be exposed to inaccurate information, misinterpretation of results, and inappropriate medical recommendations—outcomes that can lead to unnecessary anxiety, delayed diagnoses, improper treatment decisions, and increased healthcare costs. Maintaining licensure safeguards the quality and reliability of genetic services for Montana patients.

Although licensure is essential to upholding our professional standards, there is a large financial barrier to access to licensure in Montana. Currently, there is a \$500 application fee and \$255 renewal fee, which is double the national average of \$220 application fee and \$145 renewal fee.

I urge the Task Force to focus on reducing the financial barrier to licensure while upholding the licensure requirements that protect our Montana patients.

Thank you for your time and consideration.

*Sincerely,
Emma Fosbinder, MS, CGC*

Client name Ben Bergstrom
Form Montana Licensing Reform Task Force
Matter Ben Bergstrom - Rules
Sent February 12, 2026 at 4:30 PM
Due
Submitted February 12, 2026 at 4:30 PM

Ben Bergstrom

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Montana Licensing Reform Task Force

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General comment

What are your comments?

Thank you for convening this Task Force to address these important issues.

Montana has one of the oldest populations in the United States, one of the lowest population densities, and a healthcare system heavily dependent on critical access hospitals. As a result, our state faces persistent challenges in recruiting and retaining specialists. Demand for care continues to rise faster than workforce replacement, leading to increasing reliance on temporary providers such as traveling clinicians.

At the same time, healthcare professionals participating in the Montana Assistance Program are often restricted from practicing in their specialties for longer durations than comparable professionals in other states. This has a dual impact: it further reduces the number of residential providers available to serve Montana communities and increases financial strain on both the state and healthcare systems—without evidence of increased public safety benefit.

For example, I am a Certified Registered Nurse Anesthetist who has participated in the Assistance Program for two years. Despite undergoing multiple evaluations indicating that I am safe to return to practice, I have been unable to do so due to program and Board of Nursing restrictions. In other states, professionals with similar credentials and similar circumstances are often permitted to return to practice in a more timely manner under structured monitoring.

Given Montana's workforce shortages and rural healthcare needs, it may be worth evaluating whether current policies appropriately balance public protection with workforce sustainability and rehabilitation.

Client name Ronald Hartley
Form Montana Licensing Reform Task Force
Matter Ronald Hartley - Rules
Sent February 13, 2026 at 6:27 AM
Due
Submitted February 13, 2026 at 6:27 AM

Ronald Hartley

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Montana Licensing Reform Task Force

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General comment

What are your comments?

I held a license in Oregon as a CADAC I. I passed the NAADAC exam. Upon relocating to Montana I was unable to become licensed as an LAC or an LAC Candidate through reciprocity due to more educational requirements needed to qualify. In the end, it still required passing the NAADAC exam. This resulted in me going back to working in the construction industry and one less Addictions Counselor to assist those in need here in Montana.

Client name Melanie Hardy
Form Montana Licensing Reform Task Force
Matter Melanie Hardy - Rules
Sent February 12, 2026 at 8:04 PM
Due
Submitted February 12, 2026 at 8:04 PM

Melanie Hardy

Date of birth		Company
Home email	mwhardy47@gmail.com	Home address
Phone		

Montana Licensing Reform Task Force

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Specific person or topic

What are your comments?

The cost for the genetic counseling license is astronomically high. It's much higher than the national average. It's preventing patient access to capable genetic counselors who practice through telehealth from across the country.

Client name Shelbi Gragg
Form Montana Licensing Reform Task Force
Matter Shelbi Gragg - Rules
Sent February 13, 2026 at 12:54 PM
Due
Submitted February 13, 2026 at 12:54 PM

Shelbi Gragg

Date of birth	Company
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Home phone 13072504526	

Montana Licensing Reform Task Force

This Task Force was created pursuant to Executive Order 1-2026 on January 29, 2026.

Purpose of the Licensing Reform Task Force

The Task Force shall provide the Governor with recommendations and strategies for the State of Montana to reform the professional occupational licensing system for the purposes of:

- identifying and removing burdens and barriers faced by licensees that are not necessary to protect the public; and
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In developing recommendations and strategies, the Task Force shall seek input from Montana citizens, legislators, Montana associations whose members are licensed occupational professionals, professional licensing boards, relevant state agencies, advisory groups and researchers focused on occupational licensing, and other appropriate stakeholders as determined by the Task Force.

Public Record

Please note that all information received through this form is public record.

Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Barriers Subcommittee

We want to hear from you!

We would like to receive any comments you would like the Task Force, or one of its subcommittees, to review. In addition, we are specifically looking for feedback for:

1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

General comment

What are your comments?

I'm a pediatric speech-language pathologist (SLP). I've worked for 7 years, mostly in Montana, supporting children with a variety of disorders, including Autism, Down Syndrome, Cerebral Palsy, and feeding disorders. I believe I have a valuable perspective for this taskforce.

A state license for speech-language pathology is still needed to protect the community and maintain quality services.

Barriers that prevent/complicate practicing SLP in Montana:

-expensive annual payments to national certification body ASHA. SLP's pay about \$260/yr vs PT's and OT's who pay less than \$100.

-Low Medicaid reimbursement rates. Medicare also likely has this issue. However, I work with the pediatric population. Low rates handicap providers. We either have to cap the percent of these patients we accept or accept limited profits. Limited profits result in lower wages for clinicians, limited ability to provide employment benefits, buy necessary materials, and support continuing education.

-insurance limitations on the use of telemedicine.

Potential solutions:

-MT board work with ASHA to adjust annual payments to be more consistent with our colleagues.

-Work with necessary parties to help providers be appropriately reimbursed for services provided to those with Medicaid.

-Work with insurance companies to cover telemedicine. This allowing SLP's to serve all Montanans in the rural state.

I would love to collaborate with the taskforce on how to support current and incoming SLP's in Montana while maintaining professional standards our patients and communities deserve.

Please reach out, if interested.

Client name Randy Mchenry
Form Montana Licensing Reform Task Force
Matter Randy MCHENRY - Rules
Sent February 13, 2026 at 2:06 PM
Due
Submitted February 13, 2026 at 2:06 PM

Randy MCHENRY

Date of birth

Company

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Belgrade, MT 59714

Mobile phone 4062088196

Work address

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Specific person or topic

What are your comments?

Good afternoon board members,

I am writing to bring some much needed exposure to the profession for licensed denturists.

For decades, denturists have faced regulatory restrictions that do not reflect our education, training, or competency. A glaring example is dentists and hygienists operate under the Dental Practice Act with clear pathways for scope development and denturists have remained outside of that framework — limiting our ability to expand scope in ways that are supported by modern education and national standards.

Montana is the most restrictive state for our profession. We are not granted the autonomy to practice within our education and experience. This has been burdensome for far too long, and I personally know this has disenchanted many providers from seeking licensure in Montana. Ultimately, the people of Montana are the ones who are at a disadvantage and suffer from a lack of access to safe, affordable and quality care that denturists are extremely well educated and qualified to provide.

Denturists have no representation in this task force. This is very troubling and concerning to me. The MDA representative clearly stated he represents the dentists and hygienists of Montana. No word was mentioned of denturists, and all 3 professions sit on the dental board currently. I am not implying that we want to be represented by the MDA. I would like the opportunity to be represented by one of our own peers.

I have several other topics of real concern in the regulation to denturists that I strongly feel need to be addressed. I will save that for additional meetings and comment.

The Governor's stated objective is clear: he specifically stated he wants all licenses to have the ability to practice to the extent of their education and training. We clearly have not been afforded that in alignment with the advancement in education and national standards. The people of Montana have suffered long enough, and it's time we provide the expanded access to safe and quality care they rightly deserve.

*Randy McHenry LD BTSc
President, National Denturist Association*

Client name Ashley Morris
Form Montana Licensing Reform Task Force
Matter Ashley Morris - Rules
Sent February 16, 2026 at 9:59 AM
Due
Submitted February 16, 2026 at 9:59 AM

Ashley Morris

Date of birth		Company	Iceberg Support Inc
Work email	amorris@icebergsupport.com	Work address	218 1/2 Broadway St Lewistown, MT 59457
Work phone	406-426-1026		

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Specific person or topic

What are your comments?

One of Montana's strongest attributes are the connections and networks. The resources that can be shared across entities is unstoppable. The 100,000 who are targeted for job placement by the 406 initiative will likely be able to find work first in low-skill roles. Those roles at restaurants, hotels, grocery stores, etc...All struggle with the same issue - the turnover of staffing. My experience with 150% turnover at two separate facilities helps me understand this isn't a unique issue. Employees that turn over - that are capable workers - leave for jobs with relatively equal pay but full hours and benefits. While the balance of capable workers choose to live below an accessible level to maintain government benefits.

Placing a barrier like 39.8.202 (6) on rural communities, puts red tape across the ability for our communities to share staff and provide a full time job, in similar roles, across entities.

Iceberg Support is ready to be the PEO across several communities in Montana. Our model is ready to hire underemployed adults into 40 hour a week positions, across multiple entities, provide full-time benefits, and provide a sustainable work force for small businesses.

We are working hard, but until we have sustainable growth that does not have to be reinvested, we will not meet the \$100,000 threshold of net worth until at least 2028.

This company is growing and needs the working capital to do so, it can not be tied up in an untouchable contingency account to meet an arbitrary obligation.

We acknowledge this would have the most impact in communities of less than 20,000 people, not target employing licensed occupations, and that oversight and reporting would be key and we are set to comply with those requirements.

Please consider modifying 39.8.202 (6) to eliminate the net worth restriction for those operating in rural communities outside of licensed occupations. It clears barriers, provides access to the 100,000 targeted with the 406 jobs initiatives, and it helps create a 'solve' to workforce deficiencies in small communities across Montana.

Client name Marie Francis
Form Montana Licensing Reform Task Force
Matter Marie Francis - Rules
Sent February 15, 2026 at 8:48 PM
Due
Submitted February 15, 2026 at 8:48 PM

Marie Francis

Date of birth

Company

Department of Veterans health Administration

Home email rosebudxtreme@gmail.com

Home phone 14064101874

Home address

536 state highway 282
clancy, MT 59634

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Health Care Subcommittee
Barriers Subcommittee

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Specific person or topic

What are your comments?

I would like to address the newly appointed licensing taskforce regarding a competency-based LPN pathway for experienced CNAs to help Montana's nursing shortage. Attn: Kristin McColly and Healthcare Subcommittees

Dear Ms. McColly,

My name is Marie Francis, and I have worked as a Certified Nursing Assistant in Montana for more than 30 years. I have had the honor of providing direct bedside care to our nation's veterans at the Montana VA Medical Center in Helena and caring for residents in skilled nursing at Elkhorn Healthcare in Clancy, Montana.

My entire career has been devoted to hands-on care — assisting with activities of daily living, observing and reporting changes in condition, supporting care plans, and advocating for residents and their families. I have also completed Medication Aide training and am a Certified, Montana-licensed Pharmacy Technician, which has strengthened my knowledge of medication safety and the nursing scope of practice. Long-term care is where experienced CNAs are most needed, and it is where I have dedicated my life's work.

I am writing in strong support of the Board's efforts to explore licensing changes that expand opportunity while maintaining public safety. I respectfully ask you to consider a competency-based pathway that would allow highly experienced CNAs to challenge the Licensed Practical Nurse examination.

Montana's own workforce data clearly shows why "grow-your-own" advancement pathways are urgently needed:

Montana is projected to have about 750 job openings for nursing assistants every year through 2032 — the largest number of openings among all nursing occupations — and 97% of those openings are due to turnover, not new positions.

Demand for healthcare workers continues to exceed supply, with more than 1,700 healthcare job postings per month, and rural communities are losing nurses and direct-care staff to larger cities.

21% of LPNs are no longer working in healthcare, representing a major untapped workforce that could be re-engaged through flexible career pathways.

Workforce shortages are identified by state leadership as one of the biggest threats to healthcare access in Montana, especially in long-term care and rural areas.

These numbers reflect what those of us at the bedside experience every day.

At the same time, experienced CNAs face significant barriers to becoming nurses:

Limited program availability in rural areas

Long waitlists

Financial constraints while working full-time

Repetition of entry-level content we have safely practiced for decades

After 30 years in direct patient care — including service to Montana's veterans — I am not asking for standards to be lowered. I am asking for experience to be recognized as a valid measure of competency.

Other states already use experience-based pathways to practical nurse licensure while maintaining NCLEX and safety standards. For example:

California allows an equivalent method for practical nurse licensure based on documented paid bedside experience and pharmacology coursework.

Florida and Georgia provide LPN pathways for highly trained military medics and corpsmen based on prior clinical experience.

Several states, including Missouri and New York, recognize prior healthcare training and experience as a component of practical nurse eligibility.

Creating a similar pathway in Montana for long-tenured CNAs would:

Directly address long-term-care staffing shortages

Retain experienced caregivers at the bedside

Reduce educational bottlenecks

Strengthen rural healthcare access

Reward decades of safe, skilled practice

Improve continuity and quality of care for residents and veterans

Montana's healthcare workforce reports specifically recommend building local, "grow-your-own" training pipelines and stackable credentials to retain workers in our communities. An experience-based LPN pathway for CNAs is exactly that kind of solution.

I have spent 30 years caring for Montana's most vulnerable citizens. I am committed to continuing to serve, to advancing in my profession, and to being part of the solution to our state's workforce challenges.

Thank you for your leadership and for considering innovative, competency-based pathways that recognize the value of experience. I would be honored to participate in stakeholder discussions or provide testimony if the newly appointed licensing taskforce continues this work.

Respectfully,

Marie Francis CNA CPHT

Certified Nursing Assistant – 30 years

Medication Aide Training Completed

Certified, Montana-Licensed Pharmacy Technician

Montana VA Medical Center – Helena

Elkhorn Healthcare – Clancy, Montana

406 410 1874

nursinggal1970@gmail.com

Client name Rudolph Ketchum
Form Montana Licensing Reform Task Force
Matter Rudolph Ketchum - Rules
Sent February 14, 2026 at 1:12 PM
Due
Submitted February 14, 2026 at 1:12 PM

Rudolph Ketchum

Date of birth		Company	Big Hole River Enterprises LLC
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Home phone	4068329292		

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Specific person or topic

What are your comments?

Last year the Board of Outfitters implemented a law that requires licensed guides to be endorsed by a licensed outfitter in order to renew a license. In the past, a beginner guide, new applicant was required to be endorsed by an outfitter which made good public safety sense. In the following years we simply provided paperwork such as CPR training and renewed. At that point we'd negotiate contracts with various outfitters to provide a service. Now the outfitter must pre-select guides to endorse and the guide cannot renew unless pre-selected which is an extra step barrier that caused me not to renew this year. Additionally it removes my ability to negotiate details such as pay rates and various outfits where I may want to work. It would be similar to requiring a nurse to be endorsed by a doctor in order to maintain a license to work. Benefits outfitters limits the guides. Makes no sense. Barrier to work.

Client name Annemarie Mc Cormack
Form Montana Licensing Reform Task Force
Matter Annemarie McCormack - Rules
Sent February 13, 2026 at 9:34 PM
Due
Submitted February 13, 2026 at 9:34 PM

Annemarie McCormack

Date of birth		Company	Retired RN
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Home phone	4063604745		

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Health Care Subcommittee
Barriers Subcommittee

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General comment

What are your comments?

I have been an RN for 47 years and am alarmed by the Governor's recently stated need to review whether there are barriers to employment because of professional licensing requirements.

I have worked in MT as an RN for 43 years at SPH/Providence, Champion International Lumber and Plywood mill in Bonner, management/clinical at USFS Job Corps at Trapper Peak, and private industry with PacBlu.

This language used in the EO can be interpreted as a benign attempt to help workers and employers expedite on-boarding for certain positions.

However, over the wide breath of industries and years I have worked as an employee being hired and also hiring other employees, I have never encountered a "barrier" to employment because licensing requirements. Ever.

I will state this clearly-as a taxpayer and nurse, if there is a reduction of professional RN, LPN or CNA requirements not far behind will a reduction of wages, an attempt to interfere with the function of the MNA to protect member employment rights, and/or a reduction of RN staffing to allow more fractured mix of less educated frontliners to care for our Montana patients especially in rural areas.

I am not sure who the complaining parties are that find such burdens and barriers but these complainers should be listed front and center.

I strongly encourage a better use of my tax money. Why not find ways to encourage employers to increase wages for professionals who are almost all middle class workers, many unable to afford a home near their place of work? Why not address tuition costs so that the average Montanan can afford an education that allows them to earn more income and hence support the state's economy and stop our long standing 'brain drain' with our young citizens? Why not focus on small businesses and encourage tax breaks for them? Why not fund educational advancement for certain jobs so citizens can get ahead and afford to live in this state by owning their own business?

This all can be funded without taxing the middle class, who are hanging on by a thread in this state.

Client name Marie Francis
Form Montana Licensing Reform Task Force
Matter Marie Francis - Rules
Sent February 16, 2026 at 11:04 PM
Due
Submitted February 16, 2026 at 11:04 PM

Marie Francis

Date of birth

Company

Department of Veterans health
Administration

Home email rosebudxtreme@gmail.com

Mobile phone 4064101874

Home address

P. O. Box 285
Clancy, MT

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Health Care Subcommittee
Barriers Subcommittee
Sunset Review Subcommittee

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Respectfully,

Marie Francis CNA CPHT

Certified Nursing Assistant – 30 years

Medication Aide Training Completed

Certified, Montana-Licensed Pharmacy Technician

Montana VA Medical Center – Helena

Elkhorn Healthcare – Clancy, Montana

406 410 1874
nursinggal1970@gmail.com
rosebudxtreme@gmail.com

Client name Alexander James
Form Montana Licensing Reform Task Force
Matter ALEXANDER JAMES - Rules
Sent February 17, 2026 at 2:50 PM
Due
Submitted February 17, 2026 at 2:50 PM

ALEXANDER JAMES

Date of birth	Company
Home email alexandermark.james@gmail.com	Home address
Phone	

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Barriers Subcommittee

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Specific person or topic

What are your comments?

DATE: February 17, 2026

TO: Licensing Reform Task Force; Barriers Subcommittee

FROM: Alexander James, CPA

RE: Public Comment: Professional Licensing Reform – Certified Public Accounting In accordance with the mission of the Licensing Reform Task Force to identify and remove unnecessary barriers to work and support the 406 JOBS initiative, the following individual suggestions are submitted for consideration regarding the regulation of the accounting profession in Montana.

Item 1: Universal Interstate Reciprocity Suggestion: Implement a framework ensuring that a Montana-licensed CPA is automatically authorized to practice in any U.S. state or jurisdiction without additional application fees, physical filings, or redundant administrative hurdles. Administrative Context: This requires maintaining substantial equivalency with national standards to ensure Montana CPAs retain continuous Practice Privilege (Mobility) under existing interstate compacts and statutes such as MCA 37-50-325.

Item 2: Reciprocity for American CPAs in Canada Suggestion: Formalize a process where a fully licensed American CPA is eligible for the Canadian CPA/CA designation without the requirement of additional examinations, bridging courses (such as the CPARPD), or residency. Administrative Context: This suggestion seeks to modernize the existing Mutual Recognition Agreement (MRA) to recognize the substantial equivalency of the U.S. Uniform CPA Exam and the 150-hour education standard.

Item 3: Expedited Licensing for U.S.-Credentialed Canadian Citizens Suggestion: Create a provisional licensing pathway for Canadian citizens who hold U.S. (AICPA) credentials and have or desire to obtain employment in Montana. Administrative Context: This addresses administrative delays for "Border CPAs" who have already met American examination standards but face processing lags regarding their citizenship or foreign education evaluations when moving for work.

Item 4: Experience and CPE Attestation by American CPAs Suggestion: Amend ARM 24.201.502 to allow a licensed American CPA to sign off on an applicant's work experience gained within Canada for the purpose of initial licensure. Further, allow American CPAs to verify and sign off on continued Professional Education (CPE) credits earned through international practice. Administrative Context: This removes the requirement for non-supervisor "narrative" justifications and recognizes the validity of supervised experience and professional development performed in Canadian jurisdictions.

Item 5: Modernization of Residency and Identity Requirements Suggestion: Streamline the residency and identity verification process by permitting Remote Online Notarization (RON) for the "Request for Exemption from Social Security Number Requirement" (SSN Affidavit); they shouldn't be treated like "foreign applicants" because their education and exams are already 100% American-standard. Administrative Context: Currently, under MCA 37-1-307, foreign applicants without an SSN face physical notarization hurdles that delay licensure. Implementing digital identity verification would remove this de facto residency barrier.

Item 6: CPE Recognition for Banking and Capital Markets Trade Suggestion: Amend ARM 24.201.2106 to recognize internal compliance training modules, as well as direct practice in the trade as a Domestic Systemically Important Bank (DSIB) debt and capital issuer, as verifiable technical CPE. Administrative Context: This would allow CPAs in industry to receive 1:1 credit for specialized, high-level regulatory and technical training performed within Tier-1 financial institutions that conform to international banking standards.

Regards,

Alexander James CPA

Client name Kelly Hockett
Form Montana Licensing Reform Task Force
Matter Kelly Hockett - Rules
Sent February 17, 2026 at 4:20 PM
Due
Submitted February 17, 2026 at 4:20 PM

Kelly Hockett

Date of birth

Company

Four Corners Counseling

Work email k.hockett@fourcornerscounseling.org

Home address

12 East Garfield Street, C2
Bozeman, MT 59715

Phone

Montana Licensing Reform Task Force

This Task Force was created pursuant to Executive Order 1-2026 on January 29, 2026.

Purpose of the Licensing Reform Task Force

The Task Force shall provide the Governor with recommendations and strategies for the State of Montana to reform the professional occupational licensing system for the purposes of:

- identifying and removing burdens and barriers faced by licensees that are not necessary to protect the public; and
- improving access to and availability of professional services for citizens across Montana, including rural communities.

In developing recommendations and strategies, the Task Force shall seek input from Montana citizens, legislators, Montana associations whose members are licensed occupational professionals, professional licensing boards, relevant state agencies, advisory groups and researchers focused on occupational licensing, and other appropriate stakeholders as determined by the Task Force.

Public Record

Please note that all information received through this form is public record.

Which committee would you like to receive your comment?

Health Care Subcommittee
Barriers Subcommittee

We want to hear from you!

We would like to receive any comments you would like the Task Force, or one of its subcommittees, to review. In addition, we are specifically looking for feedback for:

1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

Specific person or topic

What are your comments?

Thank you for the opportunity to provide public comment.

I am a Social Work Licensure Candidate (SWLC) practicing in private practice in Montana while earning hours toward full LCSW licensure. To qualify, I must complete 3,000 supervised hours under an LCSW. My comment addresses where this licensure process is broken, particularly in regard to financial barriers, ethical clinical care, and outdated supervision models.

Financial Barriers

In private practice settings, pre-licensure employment often translates into earning only 35-45% of revenue from billable clinical hours. For many SWLCS, this is typically around \$45 per clinical hour in high cost-of-living areas such as the Gallatin Valley. At the same time, 18-22 client sessions per week (often considered as a minimum benchmark in group practices) already represents intensive emotional containment work and approaches the upper limit of what is ethically sustainable for high-quality care. Because income is tied directly to billable sessions, even candidates practicing at ethical capacity earn wages that reflect only a fraction of a standard 40-hour work week. These hours combined with substantial unpaid labor (documentation, treatment planning, research, consultation, marketing, and client communication) mean that effective compensation is far below a living wage, despite candidates holding master's degrees and completing extensive graduate practicums. For me personally, as a born and raised Bozemanite, I would have no hope of living and working here in this field without partner and family support.

Caseload Pressure & Client Access

In group practice settings, licensure candidates often have limited control over referrals and may feel pressure to accept clients based on availability rather than clinical fit in order to maintain financially viable caseloads. In smaller or independent practice models (such as my employment), candidates must build caseloads on their own- a slow and uncertain process, particularly when clients need to limit sessions due to their own financial constraints. Because candidates receive only a fraction of collected fees, offering sliding scale services, one of the most effective tools for improving access in a broken insurance system, often becomes financially impossible.

These challenges are compounded by the fact that licensure candidates in Montana cannot accept Medicaid or Medicare. As a result, candidates are prevented from serving many lower-income and rural clients who are actively seeking care. I personally have come across countless clients with these insurances in need of care who I might be a good fit for, but who I cannot offer services to. This is especially frustrating when I am working tirelessly to maintain a balanced and healthy caseload. Allowing supervised candidates to bill these payers under appropriate oversight would both expand access to services and enable candidates to build caseloads more sustainably while completing required supervised hours.

Interstate Barriers

Montana has also not joined relevant interstate licensure compacts for social work, limiting continuity of care for clients who travel seasonally, attend college out of state, or reside across state lines. This further restricts workforce mobility and unnecessarily disrupts care in a predominantly rural state.

Supervision Models and Clinical Effectiveness

The current licensure model assumes that increased hours and years of supervised practice necessarily lead to better client outcomes. However, research does not consistently support this assumption. Studies indicate that therapist effectiveness does not reliably improve simply with accumulated hours, but is more strongly associated with the quality of supervision, ongoing professional development, reflective consultation, and access to diverse clinical feedback.

Yet Montana's supervision requirements focus primarily on quantifying hours under a single supervisor, rather than emphasizing structured consultation groups, peer learning, or evidence-based continuing education. This creates a system in which candidates may complete thousands of under-paid hours all without receiving the forms of support most closely associated with improved clinical outcomes. On a personal note, I am only a year into private practice, and have already put many hours into seeking out supplemental forms of education and clinical guidance. My supervisor is a good clinician, but she is one person with one background that sometimes doesn't overlap with my areas of interest. This means I spend my own time and funds on consultation groups, continuing education, and seeking out evidence-based interventions to better serve my clients.

Conclusion and Recommendations

Taken together, these structures impose severe financial strain on licensure candidates, forcing many to rely on partners, family support, or additional employment. This makes progress toward independent licensure feasible primarily for those with economic privilege, directly conflicting with the Task Force's goal of removing unnecessary barriers and improving access to professional services, particularly in rural and underserved communities.

Recommended reforms include:

- Revising supervision requirements to emphasize a mix of high-quality supervision, structured consultation groups, peer support, and continuing education linked to demonstrated clinical competency.*
- Reducing financial barriers to sustained supervised practice*

-Providing greater flexibility in how supervised experience is documented and earned, including recognition of group consultation and structured professional development.

-Expanding opportunities for supervised candidates to serve high-need populations, including reconsideration of Medicaid and Medicare billing restrictions under appropriate oversight.

I fully support high standards that protect public safety. However, the current emphasis on total hours under a single supervisor does not equate to better care and is frankly an exploitative labor practice for licensure candidates. I urge you to seek out the opinions of other SWLCs (as well as PCLCs) across the state to gain a broader perspective on this issue, as what I have addressed here is only part of a diverse picture. I do believe meaningful reform would align licensure pathways with evidence-based practices that improve clinician effectiveness while expanding access and reducing unnecessary barriers for Montana's mental health workforce.
