

Client name Roger Staley
Form Montana Licensing Task Force
Matter Roger Staley - Rules
Sent February 11, 2026 at 9:04 AM
Due
Submitted February 11, 2026 at 9:04 AM

Roger Staley

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Mobile phone 14065650241	

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

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What are your comments?

I think this task force is a good idea but i don't see any member from an actual workforce on this board. I feel that this is important for someone who has worked in jobs that requires a license should have a position on this board.

Client name Jon T. Korkow
Form Montana Licensing Task Force
Matter Jon T. Korkow - Rules
Sent February 11, 2026 at 10:45 AM
Due
Submitted February 11, 2026 at 10:45 AM

Jon T. Korkow

Date of birth		Company	Northwest Financial Consulting/Mills Real Estate
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What are your comments?

I did not see any representation from the land appraisers organization. Requirements for becoming a certified appraiser of real property in Montana are onerous and prohibits many from entering this profession. This profession is self-regulated and self-serving entity that has, over the years, continually added to the requirements in "appraising" land. This discourages many from entering the field providing for little competition and higher fees charged for services to get the end product. Lenders are required by fed regs to include an appraisal of property in the file for loan making purposes. The shortage and demand for appraisers has been a long withstanding bottleneck in most transactions that involve real estate.

Client name Deborah Kimmet
Form Montana Licensing Task Force
Matter Deborah Kimmet - Rules
Sent February 11, 2026 at 10:12 AM
Due
Submitted February 11, 2026 at 10:12 AM

Deborah Kimmet

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Home phone 406-544-4704	

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What are your comments?

*Please put both email addresses on the interested parties list for:
Montana Licensing Task Force Meetings
All Montana Licensing Task Force Subcommittee Meetings EXCEPT the Construction Subcommittee
Thank you!*

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

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Public Record

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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 Christine K. Bond
Form Montana Licensing Reform Task Force
Matter Christine K. Bond - Rules
Sent February 11, 2026 at 3:49 PM
Due
Submitted February 11, 2026 at 3:49 PM

Christine K. Bond

Date of birth

Company 7JZ

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Missoula, MT 59802

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Montana Licensing Reform Task Force

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

We want to hear from you!

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Specific person or topic

What are your comments?

Licensure for registered dietitians is critical for ensuring that safe and reliable nutrition information is disseminated to Montanas. Registered dietitians (RDs) are the only nutrition professionals who are required to earn a least a bachelors degree in a specific didactic program, complete a 10-12 month internship, and pass a board certification exam. We are also required to complete board-approved 75 units of continuing education credits every 5 years. Staying engaged and updated on evolving science is critical in relaying appropriate nutrition information to consumers, as nourishment influences all areas of physical and mental wellness, and reduces costs of managing chronic illnesses. The nutrition licensure ensures that a practitioner has the RD credentials. In this day in age of extremism and social media posting erroneous, lack-of-evidence-based information, the public is widely confused about what nutrition science actually supports. The licensed, registered dietitian is the ultimate professional for optimizing Montana's nutritional health and reducing costs.

Client name Julie Anton
Form Montana Licensing Reform Task Force
Matter Julie Anton - Rules
Sent February 11, 2026 at 6:17 PM
Due
Submitted February 11, 2026 at 6:17 PM

Julie Anton

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Mobile phone	406-868-1839		

Montana Licensing Reform Task Force

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Which committee would you like to receive your comment?

Full 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?

General comment

What are your comments?

A potential new real estate agent in my office submitted an application for a Real Estate Salesperson license on 01/07/2026. It is now 02/11/2026 and we do not yet have license approval. This is a ridiculous amount of time to have to wait to get a salesperson license. We have tried calling DLI multiple times to understand what the hold-up is. With each call, we get referred to a specific person who never answers the phone, so we leave a voicemail message, and we never get a call back. This is unacceptable and I feel compelled to alert you of this occurrence in hopes you can better streamline not only the application acceptance process, but also improve your communications with the applicants. Thanks for listening!

Client name Elise Baine
Form Montana Licensing Reform Task Force
Matter Elise Baine - Rules
Sent February 12, 2026 at 9:29 AM
Due
Submitted February 12, 2026 at 9:29 AM

Elise Baine

Date of birth**Company**

Federation of State
Massage Therapy Boards

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Work address

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Overland Park, KS 66210

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?

General comment

What are your comments?

The Federation of State Massage Therapy Boards (FSMTB) is a not-for-profit organization with a membership comprised of 47 massage therapy licensing boards and agencies in the United States and its territories. Our mission is to support our member boards in their work to ensure that the practice of massage therapy is provided to the public safely and competently. We do this by promoting and supporting public protection and regulatory excellence by providing education, best practices, and sharing the collective wisdom of massage therapy regulators from across the country. The Montana Board of Massage Therapy is a member of the FSMTB.

We are writing to recommend the Licensing Reform Task Force include a representative from the massage therapy profession. Massage therapy has an unfortunate intersection with human (sex) trafficking, illicit businesses, and fraud that is not present in the regulation of other health care professions. The expertise of a stakeholder in this arena will benefit the Task Force by ensuring the smart, "right-touch" regulation of massage therapy does not jeopardize public safety and inadvertently facilitate human trafficking. The appropriate regulation of massage therapy has a deep effect on the health, safety, and welfare of the public, which includes the licensed massage therapists, and especially those who may be trafficked persons.

We acknowledge that there can be occasions where certain regulatory frameworks may be outdated or unduly burdensome. We reinforce the principle that licensing standards and requirements should be set to determine entry-level competence, or minimum requirements, to safely practice and then allow the free market to determine what level of "quality" consumers desire above that minimum standard. Access to care that can cause harm is really access to no care at all.

It is our understanding that there are three individuals that are willing to serve on the Task Force and/or any of the Subcommittees: (1) Deb Kimmet, the Executive Director of the Business League for Massage Therapy & Bodywork; (2) Jennifer Roth, the Chair of the Montana Board of Massage Therapy; and (3) Eric Hart, Chapter President of the Montana Chapter of the American Massage Therapy Association. If you would like additional recommendations, please contact me.

Thank you for the opportunity to comment on this important initiative.

Client name Lowell O. Wavrick
Form Montana Licensing Reform Task Force
Matter Lowell O. Wavrick - Rules
Sent February 12, 2026 at 9:21 AM
Due
Submitted February 12, 2026 at 9:21 AM

Lowell O. Wavrick

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Mobile phone	406-945-1730		

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Which committee would you like to receive your comment?

Full Task Force

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Specific person or topic

What are your comments?

Dear Behavioral Licensing Task Force,

As a professional Addiction Therapist in Missoula for many years, I felt compelled to write to you. I want to start by saying, before the current sitting Executive Officer, and before my first application was submitted, I spoke with the sitting board Executive Officer about my master's degree, and my graduate credit situation, and was informed that my combined graduate credits would be adequate for licensure. Since then, on two different occasions, I have applied for my LCPC (Licensed Clinical Professional Counselor) license through the Montana Board of Behavioral Health, both through the current sitting Executive Officer. On both occasions, my application was denied for issues I feel are inappropriate and unjustified. It was alarming to me, as well as to many of my licensed co-workers, that the Executive Officer for this board did not believe my second application should even be reviewed by the entire board, which is the normal procedure.

The governing Arm Rule (24.219.601) stipulates that an applicant needs to possess a master's degree that totals sixty semester credits. My current master's degree only holds a total of thirty-five semester credits. Obviously, my degree is twenty-five credits short of what is needed for licensure. This is where my educational situation becomes the topic of contention. Due to certain situations that transpired during my pursuit of education, I had to attend multiple different master's programs, ranging from Montana State University, MSU Northern in Havre, Montana, to Walla Walla University, and Grand Canyon University in Arizona. Though my master's degree only holds thirty-five semester credits, I have personally attended and passed a very large number of graduate-level classes that total well over 60 semester credits, all of which pertain to mental health and addiction therapy.

Over the course of my career, I have not only been a Licensed Addiction Counselor, but I have been the Clinical Director of three inpatient treatment facilities where I directly supervised licensed mental health therapists, including LCPC's, LCSW's, and LAC's. I have letters of recommendation from current and past behavioral board members, as well as multiple licensed community therapists.

Both of my prior applications to the state for licensure have been denied due to my master's degree holding fewer than sixty semester credits. Given my circumstances, I feel (as do many other qualified licensed professionals in the state) that this denial is unjust and unfounded. Though the ARM regulation states there needs to be a certain number of credits for licensure, there is also a part of the regulation that allows for experience to be taken into consideration, offsetting certain requirements. It also states in the Behavioral Board Bylaws that the board can make an exception to the rules if it feels the candidate is qualified. Within this dilemma lies my complaint.

I have spent my career attempting to help those in need, only to be turned down twice by the board. Given Montana's shortage of qualified, licensed mental health therapists, it would seem my case is a perfect example of an exception that is justified. I bring this to your attention not to gain personal validation, but in a plea that the board is more open in their interpretation of applicants' qualifications. Montana has a great need for mental health practitioners, and I am qualified to fill that need. If others in my situation continue to be denied licensure, Montana will never fill the need that has developed.

Sincerely, Lowell Wavrick, MS, LAC.

Client name Mary Danford
Form Montana Licensing Reform Task Force
Matter Mary Danford - Rules
Sent February 12, 2026 at 10:08 AM
Due
Submitted February 12, 2026 at 10:08 AM

Mary Danford

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Phone			

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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Construction Subcommittee

We want to hear from you!

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Specific person or topic

What are your comments?

Contractor Licensing Insurance Requirements.

DOLI Contractor Licensing could add a simple check box for contractors that they have the appropriate contractor's liability insurance coverage for work being performed as stated on their license, if not, they will be held liable.

Recently, I had remodel work done. The contractor's license states, "small remodel" jobs but is liability insurance is carpentry.

Contractor's Liability insurance needs to be commensurate with licensed work for all aspects of work being claimed on license.

This would protect both Montana contractors and home owners or businesses.

Thank you.

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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Montana Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

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 Rhiannon Ohman
Form Montana Licensing Reform Task Force
Matter Rhiannon Ohman - Rules
Sent February 12, 2026 at 7:33 AM
Due
Submitted February 12, 2026 at 7:33 AM

Rhiannon Ohman

Date of birth		Company	MOSAIC Health & Rehab
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Home phone	+14063884988		

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Health Care Subcommittee

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Specific person or topic

What are your comments?

I strongly oppose the proposal to remove licensing requirements for physical therapists in the State of Montana. Licensure is essential to ensure physical therapists have completed accredited education, passed national board examinations, and maintain ongoing competency through continuing education. Without licensure, the state would have no effective way to verify qualifications, regulate national board passage, or enforce continuing education standards—removing critical protections for patients.

Physical therapy directly impacts patient safety and recovery. Eliminating oversight will not improve access to care and instead risks inconsistent treatment, preventable injury, and erosion of public trust. Montanans deserve assurance that licensed healthcare professionals meet established, enforceable standards.

Thank you

Client name Adrie Min
Form Montana Licensing Reform Task Force
Matter Adrie Min - Rules
Sent February 12, 2026 at 10:41 AM
Due
Submitted February 12, 2026 at 10:41 AM

Adrie Min

Date of birth

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Home address

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Ryegate, MT 59074

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Montana Licensing Reform Task Force

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General comment

What are your comments?

Government, the protector or treat to our rights?

(Part of this essay was written earlier as a rebuke to the passing of constitutional proposition 128, getting the so-called right to kill the innocent in the womb (abortion) in the Constitution of Montana.

Thomas Jefferson wrote in the Declaration of Independence:

"We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain inalienable Rights, that among these are Life, Liberty and the pursuit of Happiness- That to secure these rights, governments are instituted among Men, etc"

So, the most important task of government is to secure people's rights!!

Any entity, business, organization, etc. usually has a vision and mission statement to show prospective shareholders and costumers what they are about. Policies and procedures are written to assist present and future shareholders and employees to remain steadfast in fulfilling the vision and mission statements.

The Declaration of Independence can be considered the vision/mission statement of the United States of America. The Constitution gives the guidelines (policies and procedures) that those forming our government have to abide by to run the government in accordance with the vision/mission statement.

So, America was created by "renegades or rebels" (as the outside world saw them), who were sick and tired of tyranny and who wanted to secure a free nation for generations to come. A nation free from oppressive government; ruled by law, not by arbitrary rules from kings, rulers and over-men.

To protect the people's rights to life, liberty and the pursuit of happiness government is needed. Everybody for themselves with no rules to live by creates chaos and will not last.

So a republican form of government was chosen; a government chosen from people among their peers; of the people, by the people, for the people, with no special rights for anybody. Unique in world history! People steering their own destiny instead of a few powerful families or a king ruling by decree!

Representatives were chosen in accordance with the rules set forth in the Constitution, employed by the people temporarily or permanently for a period of time to entertain certain jobs necessary to PROTECT people's rights, run a smooth society; all clearly outlined in the basic rule of the land, the Constitution. A republican form of government was born, but not a democracy! A democracy is mob rule!

None of the elected government officials have special rights, but the same rights as the people that chose them. None of them can pass laws violating people's rights or exclude certain groups of people from exercising their God given rights. Laws legally passed have to apply to all equally!

The US Constitution limits the power of government; it gives the government certain enumerated powers. Not unlimited powers as certain individuals think nowadays.

That brings me to the right to Liberty and the pursuit of Happiness. Nowadays, these rights seem to come from government, only with a government license can people perform certain tasks, earn a living, start a business, etc!!

Everybody can hammer a nail in a piece of wood, some people better than others and become carpenters. That does not mean that those who are no carpenters cannot hammer a nail in a piece of wood anymore. However it seems that over time the 'real' carpenter saw the non-carpenter as a threat to the 'real' carpenter's livelihood. So a carpenters association was formed to petition the government to pass a law prohibiting none-carpenters from driving nails in wood to protect their livelihood. Sorry I mean to say that society can now be protected from quacks that think they can hammer a nail in a piece of wood the way only a real carpenter does it!

Many professional groups have been able to just do that certain thing! Petition government officials to pass laws prohibiting people from doing stuff that comes naturally to them unless they attend expensive schooling, pass numerous exams, have annual licensing fees and abide by the 'rules' set by the governing carpenter's body, all to protect society from a nail being hammered wrong!

To collect the annual licensing fees and to make sure that people stay within their turf government created a department of labor. All to make sure, that 'non-carpenters' do not drive a nail in a piece of wood the wrong way and to 'protect' society.

Of course we need enforcers of these laws and regulations so over time agencies like the ATFE , OSHA, DEA, TSA, FDA, CDC, BLM, Forest Service and other enforcing government bodies duplicated also at state level were born! All for the good of society and to protect as from ourselves!

And so society became an entanglement of rules and regulations; even lawyers need to specialize! The people were not free anymore. Government became all-powerful. Now a government license was required for even the most mundane jobs, like serving food to your fellow man, selling fruit at a fruit stand or opening up your own business. You mention a profession and you need a government license! And crossing the street at the wrong place landed you in jail.

Except the individuals running for office, they don't require a license but they have proven to be the most dangerous of all! When this nation started, people were free. They could pursue their dream without government interference and keep the fruits of their labor. Gradually the people in this nation have been made to believe that government officials have more power than the 'regular' citizens and that they can pass laws for anything. Every year new laws enter the book, but very few are being repealed.

When you vote for a person to represent you, you delegate your authority. You do not relinquish it. The government official may now act on your behalf within the constraints of the constitution. But they cannot abuse that power of attorney to pass laws to control you. And they cannot pass laws to enable certain groups of people to have increased privileges, or by law take away certain rights from groups of people because of some perceived threat. A lawful law passed for one, is a law passed for all!

So what I would like to see is the following:

1. Get rid of many or all licensing and continuous education requirements.

And - Or

2. Licensing requirements for elected officials. They are employed by "We the People." Our elected officials have shown to be more dangerous to society and the security of a free state than any of the professions that have a license requirement.

A. Require from people running for any local state or federal office that they show proof, that they have studied the Constitution, both US Constitution and their state constitution. B. Demand a licensing requirement.

C. They also need proof that they did their annual continuous education to keep up that license.

The government, through their department of labor, requires an annual renewal license for all other jobs with continuous education hours, so we the people should demand the same from them! Expired license means out of a job representing the people!

D. And of course a drug test that most businesses require before they hire an employee. We don't want druggies running our state!

E. An annual grand jury job performance evaluation for elected officials to judge their abiding by the Constitution.

F. Set fines and possible imprisonment for those, who constantly violate their oath of office.

Client name Kyle Austin
Form Montana Licensing Reform Task Force
Matter Kyle Austin - Rules
Sent February 12, 2026 at 11:46 AM
Due
Submitted February 12, 2026 at 11:46 AM

Kyle Austin

Date of birth

Company Pharm406, INC

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BILLINGS, MT 59102

Mobile phone 14062623098

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?

Full Task Force

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?

My Fellow Montanans,

Small businesses are under attack by the Montana Department of Labor and Industry (DLI). Slowly every year the DLI has created more regulations over small businesses and has squeezed small businesses out of business in our state. This is the opposite of what has been promised by our republican party and Governor Gianforte. The red tape agenda has been nothing more than empty promises and nothing more than big government overreach. Montana voters need to shift away from voting republican this election cycle.

Furthermore, I have personally witnessed the Montana Department of Labor and Industry siding with large corporate competitors to use the DLI as a mechanism to harass and attack small businesses in this state. The DLI does not follow rules of civil procedures and consistently violates Montanans' constitutional rights when impeding on the rights of business owners in this state.

The Montana Board of Pharmacy is also included within the Montana Department of Labor. As a pharmacist and pharmacy owner, I have seen the executive director, the board, and the pharmacy inspectors misdirect the legislature into passing a woke liberal agenda driving socialism in the private industry in our state. This agenda has limited marketplace competition, restricted market entry of new entrepreneurs, created barriers to affordable and accessible healthcare, and increased the costs of doing business in our state. I have also witnessed the board of pharmacy attacking private for-profit business's for requiring payment for services provided in this state.

I also want to include that the DLI has overtaxed small business's stockpiling a trust fund amounting to over \$643 million dollars. This is unacceptable, these funds need to be returned to the businesses who paid them.

As a candidate for the United States Senate, it is my number 1 priority when elected to pull the roughly \$66.9 million federal dollars that is provided to the DLI. Doing so will downsize the big government, create economic stability, and allow small businesses to thrive once more in our great state of Montana. I encourage Montana legislators to do the same.

Sincerely,

Kyle Austin, PharmD

Candidate for United States Senate

Client name Carolyn Belt
Form Montana Licensing Reform Task Force
Matter Carolyn Belt - Rules
Sent February 12, 2026 at 1:09 PM
Due
Submitted February 12, 2026 at 1:09 PM

Carolyn Belt

Date of birth	Company
Home email carolynbelt6@gmail.com	Home address
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

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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

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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?

My name is Carolyn Belt and I am a pre-licensed social worker in Montana. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not. As a pre-licensed provider who will be able to seek my LCSW license this year, I want to emphasize that clinical supervision is not administrative red tape. Behavioral health requires profession-specific review!

I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

*Thank you,
Carolyn*

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

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Work phone 14066078003

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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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Barriers Subcommittee

We want to hear from you!

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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?

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 Kaitlyn Bosshardt
Form Montana Licensing Reform Task Force
Matter Kaitlyn Bosshardt - Rules
Sent February 12, 2026 at 2:51 PM
Due
Submitted February 12, 2026 at 2:51 PM

Kaitlyn Bosshardt

Date of birth**Company****Home email** kaitlynbosshardt@gmail.com**Work address**2813 Queen St
Missoula, MT 59801**Home phone** 13606492701

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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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

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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?

My name is Kaitlyn Bosshardt and I am a licensed social worker in Montana. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not.

I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

Thank you,

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

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Phone

Montana Licensing Reform Task Force

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Barriers Subcommittee

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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?

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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Full Task Force
Health Care Subcommittee
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?

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 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

Date of birth	Company
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Mobile phone 4066983381	

Montana Licensing Reform Task Force

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Purpose of the Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Barriers Subcommittee

We want to hear from you!

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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 held a license in Oregon as a CADIC 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 Kevin Shon
Form Montana Licensing Reform Task Force
Matter Kevin Shon - Rules
Sent February 12, 2026 at 9:36 PM
Due
Submitted February 12, 2026 at 9:36 PM

Kevin Shon

Date of birth		Company	Summits Beyond Counseling
Work email	summitsbeyond@gmail.com	Work address	44 N Last Chance Gulch, STE 14 Helena, MT 59601
Work phone	14067296645		

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

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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Construction Subcommittee
Barriers Subcommittee
Sunset Review Subcommittee

We want to hear from you!

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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?

My name is Kevin Shon and I am a licensed social worker in Montana. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not. I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

Public protection in behavioral health depends on qualified, licensed, and excellently trained mental health practitioners - social workers go through rigorous clinical supervision prior to becoming fully licensed - a substantial equalizer in the cross comparison of psychology interns, counseling graduate trainees, and MSW graduates pursuing a professional future of direct clinical services practice.

I am concerned that during previous legislative session, that social workers were potentially misrepresented as only social services and family services enforcement agents. Although tCPS and APS services are incredibly necessary to keep the vulnerable safe, clinical social workers comprise several more roles in the community at a clinical level that support access to and the receipt of mental health services, including psychotherapy. Finally:

Clinical supervision is not administrative red tape; and interstate compact portability can be improved and can include licensed clinical social workers without weakening safeguards.

Thank you,

Kevin Shon, LCSW

Client name Darcie Kelly
Form Montana Licensing Reform Task Force
Matter Darcie Kelly - Rules
Sent February 12, 2026 at 8:11 PM
Due
Submitted February 12, 2026 at 8:11 PM

Darcie Kelly

Date of birth

Company

Home email freshstepseap@gmail.com

Home address 1609 Flowerree Street
Helena, MT 59601

Home phone 14064397766

Montana Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

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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?

My name is Darcie Kelly, and I am a licensed social worker in Montana. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not.

I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

Thank you,

Darcie Kelly, LCSW MBA

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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Public Record

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Which committee would you like to receive your comment?

*Full Task Force
Health Care Subcommittee
Barriers Subcommittee*

We want to hear from you!

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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?

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 Sarah Goodman
Form Montana Licensing Reform Task Force
Matter Sarah Goodman - Rules
Sent February 12, 2026 at 7:39 PM
Due
Submitted February 12, 2026 at 7:39 PM

Sarah Goodman

Date of birth	Company
Home email sarahgoodman925@gmail.com	Home address 703 Brookwood Dr. Billings, MT 59101
Mobile phone 15035399253	

Montana Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

Health Care Subcommittee

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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?

My name is Sarah Goodman, and I am a Clinical Social Worker Licensure Candidate in Montana actively working in the healthcare setting with Veterans. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states. The SW Interstate compact will improve the continuum of care for Veterans and other populations moving across state lines who move due to work duties or family responsibilities, among other personal reasons. Allowing clients to maintain established mental health treatment relationships during stressful times post-move will greatly improve the quality of healthcare in our region.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety. Behavioral health professional guidelines require profession-specific review. Clinical supervision is not administrative red tape, but ensures we deliver ethical, client-centered care with best practices across the profession.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not. I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

*Thank you,
Sarah Goodman*

Client name Mc Kenna Mill
Form Montana Licensing Reform Task Force
Matter McKenna Mill - Rules
Sent February 12, 2026 at 7:23 PM
Due
Submitted February 12, 2026 at 7:23 PM

McKenna Mill

Date of birth	Company
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Mobile phone 4068999339	

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?

Full Task Force
Health Care 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?

My name is McKenna Mill, and I am a licensed clinical social worker in Montana. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not.

I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

Thank you,

McKenna

Client name Scott Mc
Carthy
Form Montana Licensing Reform Task Force
Matter Scott McCarthy - Rules
Sent February 12, 2026 at 7:19
PM
Due
Submitted February 12, 2026 at 7:19
PM

Scott McCarthy

Date of birth		Company	
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Home phone	4065551234		

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Public Record

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Construction Subcommittee
Barriers Subcommittee
Sunset Review Subcommittee

We want to hear from you!

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General comment

What are your comments?

Licensing Reform Task Force,

While I can understand some licensing procedures that Montana has are useless (ServSafe for and example.)

What a idiotic idea to loosen regulations/licensing for the Trades (Example: Electrical/Plumbing/Structural Construction) and a even more moronic idea to loosen regulations/licensing for the Medical Field!

I can't speak for the Medical Field, but I can say I don't want some uneducated medical staff that hasn't been trained properly working on me for ANYTHING!

As far as the Trades go. We already have enough grifters working in our state. They already come here because their states require way more education and training. We need to require more not less from our trades. For example: HVAC & Low Voltage Companies!

Get your act together and make Montana better, not worse!

Client name Vivienne Riseley
Form Montana Licensing Reform Task Force
Matter vivienne riseley - Rules
Sent February 12, 2026 at 6:20 PM
Due
Submitted February 12, 2026 at 6:20 PM

vivienne riseley

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Montana Licensing Reform Task Force

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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 am a licensed clinical social worker in Montana. As you identify healthcare priorities, I want to emphasize two things.

First, the Social Work Interstate Compact should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, any review of Title 37 healthcare licensing must include direct input from social workers. Behavioral health licensing involves education, supervised clinical experience, and scope protections that are essential for public safety.

Streamlining administrative processes makes sense. Reducing clinical safeguards does not.

I respectfully ask that social work representation be included in this subcommittee's work and that the Compact be identified as a top priority.

Thank you,

Client name Paul B. Kilzer
Form Montana Licensing Reform Task Force
Matter Paul B. Kilzer - Rules
Sent February 13, 2026 at 10:25 AM
Due
Submitted February 13, 2026 at 10:25 AM

Paul B. Kilzer

Date of birth

Company

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Missoula, MT 59803

Home phone 14063705456

Montana Licensing Reform Task Force

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Full Task Force
Health Care Subcommittee

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General comment

What are your comments?

As a Montana physician, with more than 25 years of healthcare provider credentialing experience in hospital and PPO settings and the current Medical Director of Credentialing at Monida Healthcare Network, I agree that Montana professional occupational licensing should eliminate barriers that are not necessary to protect the public. It's a worthy goal to make Montana licensing more efficient. However, our paramount goal must continue to be "...to protect the health, safety, and well being of Montana citizens" as stated in the Montana Board of Medical Examiners Mission Statement.

While the vast majority of Montana health care providers are ethical and competent and deserve an efficient and responsive licensing system, I am aware of a small but troubling subset of healthcare providers who were granted Montana licenses or had their licenses maintained or reinstated in Montana, despite available information that their licenses in other states had been surrendered or suspended or their license applications in other states had been rejected. Some of these individuals were never members of the Monida Healthcare provider network, and my knowledge of them is entirely from Montana newspaper articles and Montana District Court and Montana Supreme Court documents. I cannot share protected information and, unless contacted by a Montana Licensing Task Force Healthcare Subcommittee representative, will not share the details of publicly available information.

In my view, Montana's licensing standards and/or their implementation have been less stringent than those of other states, allowing the licensing of some healthcare providers who present an undue risk to Montana citizens.

In submitting this comment, my goal is not to disparage anyone but to emphasize the importance of assuring that Montana licensing standards and their implementation truly protect the health, safety, and wellbeing of Montana citizens.

*Paul Kilzer, MD
Missoula*

Client name Allysha M. Dalzell
Form Montana Licensing Reform Task Force
Matter Allysha M. Dalzell - Rules
Sent February 13, 2026 at 11:08 AM
Due
Submitted February 13, 2026 at 11:08 AM

Allysha M. Dalzell

Date of birth	Company
Home email allyshadalzell@gmail.com	Home address Helena, MT 59602
Phone	

Montana Licensing Reform Task Force

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Full Task Force
Health Care Subcommittee

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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?

Hello committee members, I appreciate you taking the time to read these comments. I'm a pre-licensed social worker in Montana and I'm hoping there are a few things I can convey to you:

First, the Social Work Interstate Compact (or any federal/inter-state compacts to ensure these health care standards can move from state to state with more ease while upholding qualifications) should be prioritized. It improves workforce mobility without lowering standards and strengthens disciplinary coordination across states.

Second, behavioral health licensing involves education (making sure we have the correct education and hours to indicate scope, experience, qualifications), supervised clinical experience (to ensure we can be welcome and safe/qualified additions to the workforce), and scope protections that are essential for public safety. And when I say "essential" it is absolutely that. Reducing any of these safeguards is negligent at best and downright dangerous otherwise.

Licensing (and the process to ensure appropriateness and qualifications of candidates) does not restrict workforce numbers, it ensures safety of its citizens and the workforce itself. Streamlining administrative processes makes sense. Reducing those clinical safeguards does not. Even at this point, the administrative process is fairly straightforward and streamlined, and doesn't take too much time (I just went through it not long ago).

I respectfully ask that social work and other health care workers representations be included in this subcommittee's work with a real ear to the reality of the situation.

Thank you for your time.

Client name Alli Bristow
Form Montana Licensing Reform Task Force
Matter Alli Bristow - Rules
Sent February 13, 2026 at 11:12 AM
Due
Submitted February 13, 2026 at 11:12 AM

Alli Bristow

Date of birth		Company	The University of Montana
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Mobile phone	4062188205		

Montana Licensing Reform Task Force

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Public Record

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Full 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?

Specific person or topic

What are your comments?

My name is Alli Bristow, LCPC-79396, and I am a Licensed Clinical Professional Counselor in Montana. As you consider healthcare priorities, I respectfully wish to emphasize two important points.

First, the Counseling Interstate Compact should be prioritized. The Compact enhances workforce mobility while maintaining rigorous professional standards and strengthening disciplinary coordination across participating states.

Second, any review of Title 37 healthcare licensing statutes must include direct input from licensed counselors. Behavioral health licensing encompasses education, supervised clinical experience, and clearly defined scope-of-practice protections that are fundamental to public safety.

Streamlining administrative processes is a reasonable goal. Reducing clinical safeguards is not.

I respectfully request that Licensed Clinical Professional Counselor representation be included in this subcommittee's work and that the Counseling Compact be identified as a top priority.

Thank you for your time and consideration.

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

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee
Barriers Subcommittee

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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 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
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Work phone	406-426-1026		

Montana Licensing Reform Task Force

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Barriers Subcommittee

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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

Montana Licensing Reform Task Force

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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 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

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Home phone	4063604745		

Montana Licensing Reform Task Force

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Public Record

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Full Task Force
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
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Mobile phone	4064101874		

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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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
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
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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?

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
rosebudxtreme@gmail.com

Client name Laura Puryear
Form Montana Licensing Reform Task Force
Matter Laura Puryear - Rules
Sent February 17, 2026 at 10:13 AM
Due
Submitted February 17, 2026 at 10:13 AM

Laura Puryear

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Montana Licensing Reform Task Force

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Full Task Force

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What are your comments?

I represent the Associated Bodywork and Massage Professionals, Associated Skincare Professionals, and Associated Hair Professionals. We are interested in making sure Montana maintains its current licensing standards for massage therapists, cosmetologists, and estheticians in the interest of public welfare and safety. We have decades of experience in regulatory policy in these professions and would be happy to assist the Task Force's work however we can.

One area where we see an opportunity for improvement in the professions is portability. There are currently interstate compacts being stood up for all three professions and would encourage Montana to be an early adopter of all three. Each of these compacts was drafted to prioritize transparency, public safety, and high professional standards.

We would also strongly encourage representation from the massage therapy community on the task force. We recommend the following individuals to serve:

*Jennifer Roth
Equanimity Wellness
406-696-6000
equanimitywellness@gmail.com*

*Eric Hart
evhart@hotmail.com*

*Deborah Kimmet
406-544-4704
info@blmtb.org
deb@debkimmet.com*

We look forward to seeing what the task force accomplishes this year and stand ready and willing to help however we can.

*Thank you,
Laura Puryear
ABMP/ASCP/AHP*

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
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Phone	

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Which committee would you like to receive your comment?

Full Task Force
Barriers Subcommittee

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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
