

Client name Adam Schafer
Form Montana Licensing Reform Task Force
Matter Adam Schafer - Rules
Sent March 5, 2026 at 11:16 AM
Due
Submitted March 5, 2026 at 11:16 AM

Adam Schafer

Date of birth

Company Intermountain Health

Home email adam.schafer@imail.org

Work address 1233 N. 30th St
Billings, MT 59601

Mobile phone 12409944037

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?

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?

March 5, 2026

Dear Members of the Licensing Reform Task Force Barriers Subcommittee,

On behalf of Intermountain Health's Montana hospitals, including St. Vincent Regional Hospital in Billings, Holy Rosary Hospital in Miles City and St. James Hospital in Butte, thank you for the opportunity to provide comments regarding the barriers we face in hiring, licensing, and deploying security officers in our Montana hospitals. We appreciate the Task Force's commitment to improving licensing processes that directly impact patient and caregiver safety across the state.

We would like to bring forward two significant barriers currently affecting our ability to adequately staff hospital security teams:

1. Excessive Delays in Fingerprint and Background Processing

Licensed security guards are experiencing delays of several months in receiving fingerprint clearance, which creates bottlenecks that leave hospitals without essential security coverage and security guards who cannot perform their duties. We have experienced significant delays of over 3 months, and the standard time is four to six weeks, even for applicants who are retired law enforcement officers. We also conduct our own internal background checks, but we must wait until the state's background checks are complete before we can allow the employee to perform security guard duties. We have been told that fingerprint background checks may have a faster processing time if applied for in person in Helena, but the expense and time for employees to take a day to travel to Helena to apply in person is not reasonable.

2. Inability for Prospective Applicants to Begin Licensing Before Employment

Current regulations prevent applicants from beginning the licensing process until they are officially hired, adding unnecessary time to the onboarding sequence. We encourage the Task Force to look at potential education or credentialing programs for pre-employment licensing for Montanans seeking a career in security. The subcommittee could also recommend changes to rules that would allow for a security guard to obtain a provisional license if the employer has conducted and attested to completing its own background check on the employee.

We respectfully request that the Subcommittee consider reforms that would strengthen our ability to protect caregivers and patients, while putting Montanans to work. Attention could focus on Montana Administrative Rules:

24.182.501 APPLICATION - FINGERPRINTS (1)

24.182.514 PRIVATE SECURITY GUARD

24.182.807 PRIVATE SECURITY GUARD TRAINING PROGRAM

Thank you for your attention to these issues. We would welcome the opportunity to discuss our experience further or support solution development in any way.

Sincerely,

Adam Schafer,
Intermountain Health
Adam.Schafer@imail.org

Client name Carolyn Woods
Form Montana Licensing Reform Task Force
Matter Carolyn Woods - Rules
Sent March 9, 2026 at 2:33 PM
Due
Submitted March 9, 2026 at 2:33 PM

Carolyn Woods

Date of birth		Company	Firelight Counseling LLC
Work email	carolyn@firelight.llc	Work address	56895 Pope Lane Saint Ignatius, MT 59865
Work phone	2182039067		
Home phone	2183916651		

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
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?

I am a Licensed Clinical Social Worker currently licensed and practicing psychotherapy in Montana and Minnesota. I would like to encourage the state of Montana to join the Social Work Compact. This would make the process of providing services to clients in Montana and those who move to or visit other states much easier and more accessible. Minnesota already belongs to the compact as well as many, many other states. With the shortage of mental health providers in most states, this will make delivering these services to those who are underserved much more accessible. You can access the information and see the map of states who are in the compact, pending, or do not belong in the following link. swcompact.org. This could be the single easiest way to streamline licensing for our group and allow access to those in need. Thank you!

Client name Jeffrey E. Zarycki
Form Montana Licensing Reform Task Force
Matter Jeffrey E. Zarycki - Rules
Sent March 3, 2026 at 5:19 PM
Due
Submitted March 3, 2026 at 5:19 PM

Jeffrey E. Zarycki

Date of birth		Company	Based in Montana, anonymous
Work email	engineerjz@gmail.com	Billing address	PO Box 81482 Billings, MT 59102-0665
Home phone	406-598-3182		

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
Construction 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?

Please keep my company and name anonymous.

We are a boring (directional drilling) company that is signed with IBEW local union hall. We sometimes do union work for utilities like NorthWest Energy which requires us to be signed to the Local for their projects. However, there has not been enough work available to sustain our business. The union does not allow us to leave and pursue other competitive business opportunities without paying their negotiated wages and benefits to our employees. Unfortunately, competing non-union drilling companies are free to pay whatever they want and can pursue all other work competitively including prevailing wage jobs for city and state. Here is an example: I bid on a city prevailing wage job as an IBEW union sub contractor to a IBEW union prime contractor. The prime contractor used the non-union sub contractor because they had a lower bid. The union does not even protect its own from non-union competition. In this case signing with the union is a huge disadvantage.

The fiber optic installation and boring work in Montana is another issue. We have Federal grant funds from the BEAD program spread all across Montana to install underground fiber optic networks to businesses and homes. The program does not require any kind of prevailing wage to be paid to employees. Many out of state contractors are working these jobs using 1099 workers with no insurance or benefits. Some use workers from questionable origins. They undercut the price of local contractors. When they make a mistake and cause damage they skip town and are never heard from again. This leaves damaged underground infrastructure for repair.

Montana water well drillings licenses - This is more of a club than an industry. A licensed driller documents and signs off on the apprenticeship program for new drillers to obtain a license. This controls competition, why would a licensed driller want to apprentice a new driller and introduce potential competitors into their marketplace? Anyone that demonstrates the knowledge required for licensure should be able to obtain one. I don't see why this is any different than obtaining a CDL. All licenses in Montana should only depend on demonstrating knowledge or a education credential and fulfilling the requirements of the state, not fulfilling the requirements of a competing person.

Client name Andrew R. Thomas
Form Montana Licensing Reform Task Force
Matter Andrew R. Thomas - Rules
Sent March 4, 2026 at 5:16 PM
Due
Submitted March 4, 2026 at 5:16 PM

Andrew R. Thomas

Date of birth

Company Self-employed

Home email arthomas@carroll.edu

Home address

Home phone 509-592-0720

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
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?

In addition to my earlier comment I would also encourage the Task Force to investigate the education process as it relates to training individuals for certain professions. Superficially:

1. Program accreditation: How difficult is it to accredit a new program to train certain types of professionals. Does the accrediting body limit the number of programs or does it accept general credit taken at any institution?

2. Transferability of credits done for a certain program. For example, the prerequisites for nursing programs are institution specific and generally not transferable. Ideally the curriculum for certain professional paths should be standardized.

3. Academic program attrition. Do professional or preprofessional academic program have high attrition or "weed out classes" that create unnecessary barriers for students and especially marginalized students? See: https://www.ntdaily.com/opinion/weed-out-classes-enable-unforgiving-learning-environments-that-create-barriers-against-student-improvement/article_bb14936e-fb00-11ef-9164-331b43514278.html

If so, should there be limits placed on failure rates for certain types of classes?

3. What is the overall cost in terms of time and tuition for certain professional programs. Can that cost or time allocation lowered without hindering the quality of training. Also, can the programs be made more flexible to accommodate working and non-traditional students? See e.g. https://www.utoledo.edu/law/about/leadership-series/pdf/v46n2/Critchlow_Final2.pdf
