

**Client name** Randy Mc Henry  
**Form** Montana Licensing Reform Task Force  
**Matter** Randy McHenry - Rules  
**Sent** June 17, 2026 at 1:44 PM  
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## Randy McHenry

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## Montana Licensing Reform Task Force

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

### Purpose of the Licensing Reform Task Force

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

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

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

### Public Record

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

#### Which committee would you like to receive your comment?

*Health Care Subcommittee*  
*Barriers Subcommittee*  
*Sunset Review Subcommittee*

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## 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*

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## What are your comments?

To the Licensing Reform Advisory Council:

*I have attended many of the Friday meetings and listened carefully to the discussions surrounding the Governor's Executive Order. Throughout those meetings, I have heard repeated discussions regarding expanding access to care, allowing professionals to practice at the top of their education and training, removing unnecessary barriers to service, addressing workforce shortages, and improving healthcare access in rural Montana.*

*What has been noticeably absent from those discussions is any meaningful conversation regarding denturists.*

*As someone who has spent my career serving patients, educating future providers, and advocating for the profession, I find it concerning that denturists have not been meaningfully included in a process that appears specifically designed to address the very issues our profession is uniquely positioned to help solve.*

*The Governor's Executive Order asks whether licensing structures are truly necessary to protect the public, whether they unnecessarily limit access to care, whether they contribute to workforce shortages, and whether qualified professionals are being prevented from providing services they have been educated and trained to perform. Those questions directly apply to the denturist profession.*

*Denturists are one of the few healthcare professions specifically trained to restore oral function and quality of life for patients who have lost teeth. Many of the patients we serve are elderly, medically compromised, rural, underserved, or living on fixed incomes. These are precisely the populations most affected by provider shortages and access-to-care challenges.*

*I have repeatedly heard members of the task force state that Montana should become a national leader in access to care. I have also heard repeated statements that professionals should be allowed to practice at the highest level supported by their education and advanced training. If those principles are truly guiding this process, then denturists must be part of the conversation.*

*Our education is federally accredited, rigorous, and heavily focused on patient safety. We complete extensive training in removable prosthetics, implant-supported prosthetics, patient evaluation, treatment planning, clinical procedures, laboratory procedures, and patient management. Yet despite that education, Montana denturists remain restricted from providing many services that are routinely and safely provided by denturists in other jurisdictions.*

*To be clear, denturists do not perform oral surgery and do not place dental implants. Those procedures remain the responsibility of appropriately trained surgeons and dentists. Denturists restore the prosthetic teeth that attach to implants after the surgical phase has been completed. The services being discussed involve restoration, maintenance, and prosthetic care—not surgery.*

*Recently, I attended the national denturist meetings in Canada as a representative of the United States and as the United States liaison to international denturist organizations. During those meetings, I was asked to lead Canada's implant residency program. I find it remarkable that another country would consider me qualified to lead advanced implant prosthetic education at the national level while I am prohibited from practicing many of those same skills within my own state.*

*Even more importantly, Canadian denturists have been working with implant-supported prosthetics, implant abutments, and radiographic procedures for decades. In some provinces, denturists have practiced under these expanded scopes for more than thirty years. During discussions with Canadian regulatory leaders, I learned that they have done so while maintaining strong patient safety records and without the disciplinary concerns that opponents of scope modernization often predict.*

*This is important because patient safety should remain the central focus of this discussion. Any proposed expansion should be evidence-based, data-driven, and focused on improving outcomes for patients. The evidence from other jurisdictions demonstrates that expanded denturist scopes can exist safely within a regulated environment while improving access to care.*

*The Executive Order specifically asks whether existing licensing structures contribute to workforce shortages and limit access to services in rural communities. I believe the answer is clearly yes. Denturists can play a critical role in bridging healthcare gaps in rural Montana. We already live and work in many of the communities struggling to recruit and retain providers. Expanding the scope of trained denturists would immediately increase access to care without requiring the state to create new educational programs, recruit new providers, or build new infrastructure.*

*I also want to make clear that I am not simply asking the Task Force to accept my opinion. If the Task Force wishes to review successful regulatory models, I would be happy to provide statutory language, regulations, board policies, educational standards, and scope-of-practice frameworks from Canadian provinces and other jurisdictions. I have personally spoken with regulatory leaders who have offered to share their laws, regulations, and implementation strategies with Montana should the Task Force wish to review them.*

*The Governor created this Task Force to identify barriers that no longer serve their original purpose, to improve access to*

*care, and to ensure professionals can practice according to their education and training. Denturists deserve the same thoughtful review being afforded to other healthcare professions.*

*I respectfully ask that the Task Force give serious consideration to the denturist profession, review the evidence from other jurisdictions, evaluate the substantial educational requirements already in place, and determine whether current restrictions continue to serve the public interest.*

*Montana has an opportunity to become a national leader in healthcare access, workforce innovation, and evidence-based licensing reform. I believe denturists can and should be part of that future.*

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RECEIVED  
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*Monday, June 15, 2026*

Business Standards Division  
Professional Licensing Bureau  
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Helena, MT 59620-0513

**SUBJECT:** Systemic Devaluation of Vocational and Professional Competence via Standardized Testing Monopolies: A Proposal for Universal, Performance-Based Decentralization

To the Members of the Legislative Committees and Licensing Directors,

The current framework governing professional, vocational, and occupational licensing in this country does not measure or protect public safety—it actively degrades it. By centering entry into virtually every professional field on arbitrary, standardized testing matrices, the regulatory state has forced our educational, technical, and professional schools to abandon substantive, real-world instruction. Training programs across all sectors have evolved into corporate compliance mills entirely optimized to teach applicants "how to pass the test," completely ignoring the functional, practical mechanics required to safely and effectively practice a trade or profession.

Furthermore, any administrative attempt to resolve these systemic failures by forcing applicants into state-certified institutional monopolies simply recreates the same bureaucratic inefficiencies. This petition demands a comprehensive legislative overhaul: the absolute abolition of standardized entry testing—including all written, oral, and 'behind the controls' practical examinations—and institutional training monopolies across all occupations, in favor of a decentralized, learner-driven practical training model backed by a robust, field-appropriate mentorship framework and un-shielded personal accountability.

### **I. The Universal Educational Distortions of the Testing Cartel**

The mandate for standardized testing corrupts the educational pipeline of every industry it touches. When a regulatory body establishes an arbitrary, multiple-choice snapshot or artificial stunt-based exam as the ultimate gatekeeper, it establishes a destructive "cram-and-dump" culture. Professional training programs respond by stripping away high-utility, real-world practical skills and replacing them with rote memorization and compliance-focused test preparation.

To illustrate the scope of this systemic rot, we look to four distinct professional sectors—not as isolated grievances, but as universal evidence of a failed paradigm:

- **The Medical and Healthcare Sectors:** Nursing and clinical support programs are heavily gatekept by highly standardized board exams. Yet, the current testing matrix heavily prioritizes textbook data memorization over real-world clinical intuition, stress-tolerance, and split-second patient management. Facilities regularly inherit "highly certified" graduates who excel at multiple-choice exams but lack basic, intuitive competence in high-stakes patient care.

- **The Legal Profession:** The traditional bar exam operates as a massive exercise in rote memorization, forcing applicants to spend thousands of dollars on specialized corporate test-prep courses to memorize archaic legal definitions they will never use. Passing this exam demonstrates zero predictive validity regarding an attorney's actual capability to navigate a real-world courtroom, negotiate an active contract, or ethically manage a client's crisis.
- **The Real Estate and Financial Brokerage Fields:** Applicants for real estate and financial licensing spend weeks memorizing complex, highly specific regulatory booklets to pass a state exam. Upon entering the field, these newly certified agents frequently possess zero practical comprehension of how to construct an airtight contract, protect a client from structural liability, or evaluate the real-world safety and viability of a property.
- **The Commercial Transportation Sector:** In commercial trucking, mandatory state exams force students to spend weeks mastering useless yard stunts and reciting hyper-detailed pre-trip inspection scripts. Consequently, compliance-focused driving schools regularly graduate students without ever teaching them the basic physical and mechanical tasks of the industry—such as coupling a trailer, raising heavy landing gear, or managing high-pressure pneumatic and electrical connections.

In every single instance, the test creates an expensive, artificial barrier that gives the public a dangerous illusion of safety while actively starving the applicant of real-world operational mastery.

## II. Empirical Failure of Testing as a Predictive Metric

Public policy must be grounded in empirical data rather than institutional habit. Modern macroeconomic and educational research consistently demonstrates that standardized occupational testing metrics completely lack predictive validity regarding real-world performance, safety, or quality:

- **The Zero-Correlation Data:** Recent regression discontinuity (RD) design studies analyzing professional licensing metrics across multiple industries show that while licensing exams create massive economic drag and artificially delay qualified personnel from entering the workforce, the scores themselves demonstrate *no statistically justifiable correlation* to eventual real-world quality or safety outcomes. Narrowly passing an exam does not make a professional safer or more competent; it merely indicates an aptitude for test-taking.
- **The Institutional Shift Away from Snapshots:** Data compiled by progressive vocational and professional sectors confirms that standardized, single-day snapshots fail to accurately gauge functional capability or operational growth. This data-driven realization has forced industries to abandon rigid, administrative testing frameworks altogether, shifting instead toward continuous, on-the-job peer validation where real-world safety is verified through ongoing daily performance under the direct supervision of licensed mentors — not through artificial exams.

## III. Decentralization and Case-by-Case Educational Autonomy

The state-mandated monopoly on training verification ignores a fundamental reality: individuals possess completely distinct learning styles. While a small subset of applicants may thrive within a rigid, group-based institutional school, a significant portion of the workforce achieves optimal operational mastery through direct, one-on-one mentorship.

We propose a universal return to decentralized, competency-based development, utilizing field-appropriate apprentice, permit, or provisional frameworks. Public policy should explicitly recognize any fully licensed, experienced professional as a legitimate instructional source:

1. **Deregulating the Choice of Instructor:** Restricting instructional capacity via state-certified school mandates places artificial financial and regulatory burdens on citizens. Individuals must have the unconstrained freedom to choose their own training environment, whether that involves a structured corporate academy or a highly experienced private mentor, owner-operator, or individual specialist.
2. **The Eliminating of Second-Tier Bureaucracy:** Forcing training providers to seek "state certification" merely pushes the testing cartel back one step. It forces the instructors and institutions to pass bureaucratic compliance exams, ensuring that they will teach their students to pass compliance exams, creating a closed loop of paper-pushing that entirely misses the point of practical education.

#### IV. Proposed Universal Reform Framework

We demand a comprehensive legislative overhaul to dismantle this testing loop and restore true integrity to professional and vocational development:

- **Abolish All Standardized Testing Formats:** Eliminate all administrative requirements for state-regulated entry examinations, explicitly encompassing all written theory tests, oral technical boards, and closed-environment "behind the controls" hands-on evaluations. The state shall not implement, mandate, or enforce any alternative form of testing, examination, or administrative assessment.
- **Replace Exams with Direct Peer Validation:** Transition entirely to a mentorship verification model. An applicant's eligibility to operate independently shall be determined solely by the direct, ongoing observation of their chosen licensed instructor over the course of their practical training cycle, eliminating the concept of an "examination day" entirely.
- **Implement Direct Affirmations of Professional Responsibility:** Replace the passing score metric with a legally binding sign-off. An applicant may only transition to full, independent operational status once their chosen, licensed mentor certifies their real-world capabilities via a signed affidavit, at which point the incoming professional assumes immediate, documented, un-shielded personal and civil liability for their work.

We must strip away the artificial circus acts of the testing room, stop forcing schools to teach to a broken exam, deregulate the training space to allow direct private mentorship, and establish an economy-wide system based entirely on true, real-world training and uncompromised professional accountability.

Respectfully submitted,



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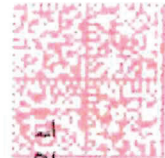


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