

Client name Amy Kirbow
Form Montana Licensing Reform Task Force
Matter Amy Kirbow - Rules
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Date of birth

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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?

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 Amy Kirbow. I am a Licensed Midwife and Certified Professional Midwife practicing in Montana. I also own and operate a birth center and have spent years training student midwives through apprenticeship. I appreciate the opportunity to speak in support of maintaining Montana's requirement that apprentices attend an additional ten births beyond the minimum clinical experience required for national certification.

As both a practicing midwife and educator, I have seen firsthand that competence is built through experience. Every birth is unique. While national certification establishes an important minimum standard, true clinical judgment develops only through repeated exposure to normal variation, unexpected complications, communication with families, and the countless subtle situations that cannot be fully taught in a classroom or simulation.

Midwifery is fundamentally an apprenticeship profession. Unlike many healthcare disciplines that rely primarily on classroom instruction and hospital-based clinical rotations, student midwives learn by walking alongside experienced midwives through the full continuum of care, prenatal visits, labor, birth, postpartum care, and newborn follow-up. They observe patterns, develop clinical intuition, build relationships with families, and learn not only what to do, but when and why to act. These are skills that can only be developed through repeated, supervised clinical experience and time.

In fact, our educational program voluntarily exceeds Montana's requirements. We require our students to attend even more births than the state mandates because we believe those additional experiences produce safer, more confident practitioners. Beyond certification, we strongly encourage graduates to complete a year-long fellowship working alongside experienced midwives before practicing independently. We make these recommendations because we have witnessed the remarkable growth that occurs during those additional births.

The difference between attending fifty births and sixty births is not simply ten more deliveries. It is ten additional opportunities to recognize variations of normal, identify developing complications, strengthen clinical decision making, refine emergency response skills, and build confidence under supervision. Those experiences benefit not only the apprentice but every family they will care for throughout their career.

Montana has long been recognized for maintaining high standards for out-of-hospital midwifery. Those standards help protect families while preserving public confidence in our profession. Lowering educational expectations may shorten the path to licensure, but it does not necessarily produce better prepared practitioners.

As healthcare providers entrusted with the lives of mothers and babies, we should be asking whether our graduates are as prepared as they can reasonably be, not simply whether they have met the minimum requirement.

After training numerous student midwives over the years, I can say without hesitation that some of the greatest growth in competence and confidence occurs after students have already completed the minimum requirements. Those final births are often where knowledge becomes wisdom.

I respectfully ask the committee to maintain Montana's additional birth requirements for student midwives. These standards reflect our commitment to excellence, patient safety, and the continued strength of midwifery in our state.

Thank you for your time and consideration.

Amy
