

Client name Nicole Mikkelson
Form Montana Licensing Reform Task Force
Matter Nicole Mikkelson - Rules
Sent July 8, 2026 at 7:05 AM
Due
Submitted July 8, 2026 at 7:05 AM

Nicole Mikkelson

Date of birth

Company

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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

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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?

Specific person or topic

What are your comments?

July 8, 2026

Montana Licensing Reform Task Force

Healthcare Subcommittee

c/o Erin Sullivan, Policy Analyst

Montana Department of Labor & Industry

Submitted via: <https://esd.dli.mt.gov/licensing-task-force/>

RE: Opposition to Consolidating the Board of Massage Therapy with the Board of Barbers and Cosmetologists

Dear Members of the Healthcare Subcommittee and Licensing Reform Task Force,

My name is Nicole Holm-Mikkelsen, and I am a licensed massage therapist and small business owner in Billings, Montana. I am writing to formally oppose any proposal to consolidate the Montana Board of Massage Therapy with the Board of Barbers and Cosmetologists, and to urge the Subcommittee not to advance this option when it is discussed at the upcoming meeting on July 17.

Why merging with the Board of Barbers and Cosmetologists is the wrong fit

Massage therapy is a healthcare-adjacent discipline built on training in anatomy, physiology, pathology, and clinical assessment. Cosmetology and barbering are not healthcare professions, and their licensees are not trained to evaluate the clinical judgment calls, contraindications, or patient-safety issues that come before the Board of Massage Therapy. Placing massage therapy oversight under a board dominated by non-healthcare licensees does not protect the public — it removes the clinical expertise the board needs to do that job well.

The seat math makes this concrete. The Board of Barbers and Cosmetologists currently has nine seats — two barbers, two cosmetologists, one esthetician, one manicurist, two members affiliated with a school, and one public member — none of whom are healthcare providers. The Board of Massage Therapy, by contrast, is already structured so that a healthcare provider and a public member sit alongside massage therapists. If massage therapy were folded into a cosmetology-dominated board, our licensees would be a small minority voice on a body with no healthcare background, and could routinely be outvoted on standards, discipline, and rulemaking that directly affect public health and safety. That is not a technical objection — it is the difference between a board that can actually evaluate a massage-related complaint and one that cannot. It's also worth noting that when a cosmetologist or esthetician performs a service that crosses into healthcare treatment, they are already required to work under the supervision of a licensed healthcare provider and fall under that provider's board — not the Board of Barbers and Cosmetologists. In other words, the cosmetology board itself does not claim jurisdiction over healthcare-adjacent services today. Handing it authority over massage therapy would be a new and inconsistent expansion of its role.

On human trafficking: I recognize both industries have been mentioned in that context, but combining the boards would not solve it. The Department has previously told the Board of Massage Therapy that anti-trafficking enforcement is a law enforcement matter, not a licensing board function — going so far as to characterize the board's involvement as "scope creep" into law enforcement during the last legislative session — and has said it lacks the staff to take on that role. None of that changes if the two boards are merged. If anything, a shared board with divided expertise across two very different industries makes focused enforcement harder, not easier.

Finally, this proposal doesn't reflect where our profession actually works. The large majority of Montana's licensed massage therapists — by our estimate, roughly 80 percent — work outside of spas, in independent practices, clinics, chiropractic offices, and other healthcare settings, not alongside cosmetologists and barbers. A board built around salon and barbershop regulation is simply disconnected from how most of our members practice.

The better alternative: consolidation with the Board of Alternative Health Care

If the Task Force concludes that some consolidation of massage therapy is necessary, we support the option already outlined by the Department — merging massage therapy, along with chiropractic, into the existing Board of Alternative Health Care — and we support it as currently written, with no changes to the board's composition.

This option makes sense because the AHCB is made up of licensed healthcare professionals, just as massage therapists are. As proposed, each profession would be equally represented rather than any one group holding a dominant voting bloc, so massage therapy would not be sidelined the way it would be on a cosmetology-dominated board. We would be regulated by fellow healthcare professionals who understand clinical scope-of-practice questions, which is precisely the kind of peer oversight that protects the public.

We anticipate the objection that massage therapy is not a "life or death" specialty and therefore doesn't belong on a healthcare board alongside obstetric physicians. Two points in response: first, the AHCB already includes a public member specifically because not every seat needs to be filled by a high-acuity medical specialty for the board's decisions to matter to public safety. Second, that framing understates the real risk of our work. Massage therapy performed without proper training and clinical judgment can cause serious harm — for example, deep tissue or circulatory work performed on a client with an undiagnosed blood clot can dislodge it, with potentially fatal consequences. Our profession's risks are real, clinical, and exactly the kind of thing a healthcare-oriented board is equipped to evaluate.

My specific requests to the Subcommittee are:

1. Do not merge the Board of Massage Therapy with the Board of Barbers and Cosmetologists.
2. If consolidation moves forward, adopt the option of merging the Board of Massage Therapy and chiropractic into the Board of Alternative Health Care, exactly as currently proposed, with no changes to its board composition.
3. Preserve Montana's participation in the Massage Therapy Licensure Compact throughout any restructuring.
4. Include practicing, licensed massage therapists in any further deliberation on this issue before a recommendation is finalized.

Thank you for your consideration and for the work the Task Force is doing to review Montana's licensing structures

thoughtfully.
Respectfully,
Nicole Holm-Mikkelsen
Licensed Massage Therapist
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tbwmassagetherapy@gmail.com

Client name Jennifer W. Walker
Form Montana Licensing Reform Task Force
Matter Jennifer W. Walker - Rules
Sent July 7, 2026 at 10:00 PM
Due
Submitted July 7, 2026 at 10:00 PM

Jennifer W. Walker

Date of birth

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Specific person or topic

What are your comments?

Statement on Massage Therapy Board Consolidation

Hello HealthCare Subcommittee Members,

My name is Jennifer (Roth) Walker. I currently serve as a member of the Massage Therapy Board, having been on the board for five years and holding the position of presiding Chair for the last two to three years. While I cannot make statements on behalf of the board, my background provides valuable perspective regarding the board's governance, operations, and oversight.

Today, however, I am addressing you as a licensed massage therapist with over 19 years of experience.

Support for Board Consolidation

The subcommittee has considered consolidating the massage therapy board. As proposed in Option 2, the massage therapy board would be merged with the Alternative Health Care Board. I support this proposal, and I would like to share several reasons for my position.

The current massage therapy board consists of three professional members, one public member, and a medical professional. This composition closely aligns with that of the Alternative Health Care Board. By including massage therapy within the Alternative Health Care Board, the profession would still retain two dedicated seats, ensuring continued representation alongside other healthcare professionals.

The Role of Massage Therapists in Health Care

A massage therapist is defined as an individual who practices massage therapy, which entails the therapeutic manipulation of muscles and other soft tissues using hands, fingers, elbows, or specialized tools. These professionals aim to relieve pain, reduce muscle tension, and enhance physical function. They are typically licensed or certified, applying their knowledge of anatomy and physiology to assess client needs, develop personalized treatment plans, and perform methods such as Swedish massage, deep tissue massage, sports massage, and aromatherapy. Massage therapists work in diverse environments, including spas, wellness centers, sports clinics, hospitals, and private practices. Their treatments support relaxation, rehabilitation, injury prevention, and overall health. They maintain client confidentiality, respect individual comfort levels, and adapt their techniques to each client, ensuring a safe and effective therapeutic experience. In summary, massage therapists combine hands-on expertise, scientific knowledge, and therapeutic approaches to improve both physical and mental well-being, making them an essential part of holistic health care. The main point is that massage therapy is an integral aspect of health care, which makes it a strong fit for inclusion on the Alternative Health Care Board.

Recent Developments in Massage Therapy

In the past few years, licensed massage therapists have been employed and contracted by the VA to provide care for veteran patients. This development underscores massage therapy's status as a health care option and recognizes massage therapists as health care providers.

Additionally, massage therapy is among the top ten prescribed services under the No Pain Act, enacted by Congress in the past year. Medical professionals can prescribe massage therapy, and services may be paid for through Health Savings Plans, Flexible Spending Plans, federal health care insurance, and private insurance. These developments further confirm massage therapy's role within the broader health care system.

Conclusion: The Place of Massage Therapy in Health Care

It is clear that massage therapy is an important part of health care, not just limited to spa or relaxation services. Most massage therapists view their work as a medical service and approach it with the seriousness and training such a role demands. For this reason, massage therapists deserve a place alongside other health care providers, fittingly represented on the Alternative Health Care Board.

While many licensing boards prefer to remain independent, consolidation in this case would not be detrimental. I believe the massage therapy board would best serve its members and the public as part of the Alternative Health Care Board.

Concerns About Consolidation with the Cosmetology Board

I would also like to address comments regarding the possibility of combining the massage therapy board with the cosmetology board. The two boards share limited common ground, primarily that some services may overlap and some massage therapists work in salons or spas. However, approximately 80% of massage therapists practice in settings outside of salons or spas. Furthermore, the cosmetology board does not include any healthcare professional oversight, whereas the massage therapy board does. Combining the two would risk removing the health care provider aspect of massage therapy, which would be detrimental to the profession.

Clarification Regarding Human Trafficking Oversight

Finally, in response to comments about human trafficking in both nail and massage therapy sectors, it should be noted that oversight of trafficking is a law enforcement matter, not one for the boards. While both boards remain mindful of trafficking issues during their work, there are no statutes or rules granting them enforcement authority in this area.

Appreciation for Thoughtful Consideration

Thank you for thoughtfully considering the issue of board consolidation and for recognizing the importance of maintaining

massage therapy as a distinct and integral component of health care. Your commitment to ensuring that massage therapy remains aligned with health care standards is greatly appreciated.

*Sincerely,
Jennifer Wynn Walker, LMT, NMT, CPhT*

Client name Brenda J. Windom
Form Montana Licensing Reform Task Force
Matter Brenda J. Windom - Rules
Sent July 7, 2026 at 5:01 PM
Due
Submitted July 7, 2026 at 5:01 PM

Brenda J. Windom

Date of birth

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Specific person or topic

What are your comments?

Merging Massage Therapy Board with ACHB vs Cosmetology Board. Massage Therapists are Allied Health Professionals. Very few work in Spas where the main focus is pampering and relaxation. Massage Therapy is serious medically necessary treatment for syndromes, diseases, injuries and malfunctions of the body. Specialties include Decongestive Therapy for Lymphedema, TMJ dysfunction, Injury recovery and restoration, Mitigating cancer treatment consequences, to name a few. L&I depends heavily on PT's and LMT's to treat dysfunction, restore normal function and strength, while teaching the patient/client how to help themselves at home. Cosmetology is in a different universe than Naturopaths, Accupuncture, Chiropracty, and Massage Therapy. If you must consolidate oversight boards, PLEASE join Massage with other Health Practitioners, NOT Cosmetology where our voices will not be heard and our culture is not respected. Thank You, Brenda Windom LMT, CLT-LANA, WCT (Nationally Cert Lymphedema Therapist, Cert Wound Care Therapist). PS my opinion matters for MT because I lived, worked and raised our kids here. I live in WA now but am soon moving back to my beloved FREE STATE.

Client name Carrie Johansson
Form Montana Licensing Reform Task Force
Matter Carrie Johansson - Rules
Sent July 8, 2026 at 3:01 PM
Due
Submitted July 8, 2026 at 3:01 PM

Carrie Johansson

Date of birth

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General comment

What are your comments?

I respectfully urge the healthcare subcommittee and the task force to oppose combining the Psychology Board into a general Behavioral Health Board.

The requirements for training, ethics, and general practice for psychologists are distinctly different from that of other mental health professionals and should be recognized and protected on a distinct board.

In addition, there are complex requirements for the interstate compact for psychologists (PsyPact) that should be regulated separately by a stand alone psychology board. PsyPact credentialing helps increase access for rural residents, students, snowbirds and other residents of Montana to have ongoing mental health services from their psychologist.

Speaking from direct experience as a recently licensed psychologist in Montana (after decades of licensure in Colorado), there were no barriers to applying for and receiving my license in a timely manner.

Finally, I believe public health and safety is best protected when psychologists are held to the standards of the profession by their peers who best understand the requirements, ethics and practice standards of our profession.

Respectfully submitted, Dr Carrie Johansson, Montana Psychologist License #5080

Client name Cassandra Crnich
Form Montana Licensing Reform Task Force
Matter Cassandra Crnich - Rules
Sent July 9, 2026 at 12:36 PM
Due
Submitted July 9, 2026 at 12:36 PM

Cassandra Crnich

Date of birth

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Specific person or topic

What are your comments?

Regarding consolidating w/ Cosmetology:

Cosmetologists are not healthcare providers. They do not have the background knowledge to protect the public, which endangers the public health, safety, and welfare.

Massage therapists are not ok with being outnumbered on the consolidated board because cosmetologists have no healthcare background

The numbers would ensure that massage therapists don't have the power to protect the public because they could be outvoted by non-healthcare providers.

Any cosmetologist providing healthcare services is not under the jurisdiction of the Board of Barbers and Cosmetologists.

They must be supervised by a healthcare provider and are under the jurisdiction of the board of that healthcare provider – NOT the cosmetology board.

The fact that human trafficking is an issue for both cosmetology and massage therapy is moot. Merging the boards won't address the problem. The department has essentially said that it's a law enforcement issue (when they accused the Board of Massage Therapy of "scope creep into law enforcement" during the last legislative session) and also explicitly said that they don't have the staff. That won't change should the boards be merged.

Most (80%) massage therapists don't work in spas

Client name Julie Johnson
Form Montana Licensing Reform Task Force
Matter Julie Johnson - Rules
Sent July 10, 2026 at 6:07 PM
Due
Submitted July 10, 2026 at 6:07 PM

Julie Johnson

Date of birth

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Specific person or topic

What are your comments?

Honorary Members of the task force:

I am writing to comment on the proposed merging the of Board of Massage Therapy with the Board of Barbers and Cosmetologists. I understand that many people believe massage therapists could be served by the merging of these to boards, but I strongly disagree. Massage is health care. I understand the misconception of massage therapy is a "spa only" luxury, massage is much more than that. Massage therapists go through rigorous studies of the human body, its system and are required to do continuing education to practice massage. I think it would be a great disserve to all parties. Understanding the want for efficiency within the government of Montana, this merger will not contribute to that goal. Thank you for taking my comments and I hope the task force decides to keep these boards separate.

Client name Irina Gernaey
Form Montana Licensing Reform Task Force
Matter Irina Gernaey - Rules
Sent July 10, 2026 at 5:27 PM
Due
Submitted July 10, 2026 at 5:27 PM

Irina Gernaey

Date of birth

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Specific person or topic

What are your comments?

I am a licensed massage therapist and I support the consolidation of the Massage Board with the Alternative Health Care as it is written. We will be regulated by other health care providers who have the same (or more advanced) training, work experience and field of work as we have. The cosmetologists, on the other hand, do not have the same medical training or background. Merging the massage therapists with the Cosmetology Board will devalue our profession and will impose lower standards (education, work requirements, CE hours etc). This will put the massage patients in danger. For instance, cancer patients or patients with pre-existing conditions, post-surgery patients seeking help, to name a few, may get hurt by a poorly trained or poorly educated massage therapist. Also, as a female massage therapist who has worked very hard to establish a good practice and to educate patients that massage therapy is not an "adult entertainment", I feel very disappointed - the idea massage therapy being regulated by the Cosmetology Board is ridiculous.

Hopefully this can be solved to everybody's benefit and satisfaction- cause we need to put our patients first.

Thank you. Irina Gernaey

Client name Jeffrey Green
Form Montana Licensing Reform Task Force
Matter Jeffrey Green - Rules
Sent July 10, 2026 at 1:11 PM
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Submitted July 10, 2026 at 1:11 PM

Jeffrey Green

Date of birth

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Please see attached document. Thanks

July 10, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

Thank you for your commitment to reviewing Montana's occupational licensing system. In currently serving on a professional licensing board, I appreciate the careful consideration required when evaluating regulatory structures that affect both public protection and professional practice.

Governor Gianforte's emphasis on reducing unnecessary barriers while preserving public safety reflects an appropriate framework for licensing reform.

Over the past four years I have served on Montana's Board of Alternative Health Care. During that time, I have participated in the Board's implementation of significant legislative changes, including the successful integration of licensed acupuncturists into the Board following the 2025 legislative session. That experience has reinforced the importance of thoughtful licensing policies that protect the public while allowing regulatory boards to function efficiently and effectively.

My experience has reinforced that licensing boards function most effectively when their responsibilities remain focused, their members possess relevant expertise, and they can devote appropriate attention to the professions they regulate.

The Alternative Health Care Board currently represents an efficient use of both state resources and volunteer public service. Because its workload is appropriately matched to the professions it regulates, the Board maintains excellent attendance, consistent quorums, timely licensing decisions, and efficient meetings. Expanding its responsibilities would require additional meeting time, increased committee work, and greater demands on volunteer board members, despite there being no demonstrated operational deficiency in the Board's current structure.

Accordingly, I respectfully oppose further consolidation of the Montana Alternative Health Care Board through the addition of other licensed professions.

Sincerely,

Dr. Jeff Green, ND

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Client name Nicole Mikkelson
Form Montana Licensing Reform Task Force
Matter Nicole Mikkelson - Rules
Sent July 9, 2026 at 4:53 PM
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Nicole Mikkelson

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July 8, 2026

Montana Licensing Reform Task Force
Healthcare Subcommittee
c/o Erin Sullivan, Policy Analyst
Montana Department of Labor & Industry
Submitted via: <https://esd.dli.mt.gov/licensing-task-force/>

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My name is Nicole Holm-Mikkelsen, and I am a licensed massage therapist and small business owner in Billings, Montana. I am writing to formally oppose any proposal to consolidate the Montana Board of Massage Therapy with the Board of Barbers and Cosmetologists, and to urge the Subcommittee not to advance this option when it is discussed at the upcoming meeting on July 17.

Why merging with the Board of Barbers and Cosmetologists is the wrong fit

Massage therapy is a healthcare-adjacent discipline built on training in anatomy, physiology, pathology, and clinical assessment. Cosmetology and barbering are not healthcare professions, and their licensees are not trained to evaluate the clinical judgment calls, contraindications, or patient-safety issues that come before the Board of Massage Therapy. Placing massage therapy oversight under a board dominated by non-healthcare licensees does not protect the public — it removes the clinical expertise the board needs to do that job well.

The seat math makes this concrete. The Board of Barbers and Cosmetologists currently has nine seats — two barbers, two cosmetologists, one esthetician, one manicurist, two members affiliated with a school, and one public member — none of whom are healthcare providers. The Board of Massage Therapy, by contrast, is already structured so that a healthcare provider and a public member sit alongside massage therapists. If massage therapy were folded into a cosmetology-dominated board, our licensees would be a small minority voice on a body with no healthcare background, and could routinely be outvoted on standards, discipline, and rulemaking that directly affect public health and safety. That is not a technical objection — it is the difference between a board that can actually evaluate a massage-related complaint and one that cannot.

It's also worth noting that when a cosmetologist or esthetician performs a service that crosses into healthcare treatment, they are already required to work under the supervision of a licensed healthcare provider and fall under that provider's board — not the Board of Barbers and Cosmetologists. In other words, the cosmetology board itself does not claim jurisdiction over

healthcare-adjacent services today. Handing it authority over massage therapy would be a new and inconsistent expansion of its role.

On human trafficking: I recognize both industries have been mentioned in that context, but combining the boards would not solve it. The Department has previously told the Board of Massage Therapy that anti-trafficking enforcement is a law enforcement matter, not a licensing board function — going so far as to characterize the board's involvement as "scope creep" into law enforcement during the last legislative session — and has said it lacks the staff to take on that role. None of that changes if the two boards are merged. If anything, a shared board with divided expertise across two very different industries makes focused enforcement harder, not easier.

Finally, this proposal doesn't reflect where our profession actually works. The large majority of Montana's licensed massage therapists — by our estimate, roughly 80 percent — work outside of spas, in independent practices, clinics, chiropractic offices, and other healthcare settings, not alongside cosmetologists and barbers. A board built around salon and barbershop regulation is simply disconnected from how most of our members practice.

The better alternative: consolidation with the Board of Alternative Health Care

If the Task Force concludes that some consolidation of massage therapy is necessary, we support the option already outlined by the Department — merging massage therapy, along with chiropractic, into the existing Board of Alternative Health Care — and we support it as currently written, with no changes to the board's composition.

This option makes sense because the AHCB is made up of licensed healthcare professionals, just as massage therapists are. As proposed, each profession would be equally represented rather than any one group holding a dominant voting bloc, so massage therapy would not be sidelined the way it would be on a cosmetology-dominated board. We would be regulated by fellow healthcare professionals who understand clinical scope-of-practice questions, which is precisely the kind of peer oversight that protects the public.

We anticipate the objection that massage therapy is not a "life or death" specialty and therefore doesn't belong on a healthcare board alongside obstetric physicians. Two points in response: first, the AHCB already includes a public member specifically because not every seat needs to be filled by a high-acuity medical specialty for the board's decisions to matter to public safety. Second, that framing understates the real risk of our work. Massage therapy performed without proper training and clinical judgment can cause serious harm — for example, deep tissue or circulatory work performed on a client with an undiagnosed blood clot can dislodge it, with potentially fatal consequences. Our profession's risks are real, clinical, and exactly the kind of thing a healthcare-oriented board is equipped to evaluate.

My specific requests to the Subcommittee are:

1. Do not merge the Board of Massage Therapy with the Board of Barbers and Cosmetologists.
2. If consolidation moves forward, adopt the option of merging the Board of Massage Therapy and chiropractic into the Board of Alternative Health Care, exactly as currently proposed, with no changes to its board composition.
3. Preserve Montana's participation in the Massage Therapy Licensure Compact throughout any restructuring.
4. Include practicing, licensed massage therapists in any further deliberation on this issue before a recommendation is finalized.

Thank you for your consideration and for the work the Task Force is doing to review Montana's licensing structures thoughtfully.

Respectfully,

Nicole Holm-Mikkelsen
Licensed Massage Therapist
Billings, Montana
tbw massagetherapy@gmail.com

Client name Jamie Kujawa
Form Montana Licensing Reform Task Force
Matter Jamie Kujawa - Rules
Sent July 12, 2026 at 2:28 PM
Due
Submitted July 12, 2026 at 2:28 PM

Jamie Kujawa

Date of birth

Company

Home email jkujawa22@yahoo.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

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

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?

Regarding consolidating w/ Cosmetology:

This merge would be appalling. First, Cosmetologists are not healthcare providers; why would we as therapists be even considered with them? Cosmetologists do not possess the background knowledge, training or skillset to protect the public, which endangers public health, safety, and welfare.

Merging would ensure that massage therapists don't have the power to protect the public because they could be outvoted by non-healthcare providers, which again is appalling. Why would non health care professionals be able to comment on or decide health related concerns and decisions??

Any cosmetologist providing healthcare services is not under the jurisdiction of the Board of Barbers and Cosmetologists. They must be supervised by a healthcare provider and are under the jurisdiction of the board of that healthcare provider – NOT the cosmetology board.

As a private practice massage therapist with 1000's of hours and dollars of training, I am absolutely NOT in favor of this merge. I work for myself and have taken painstaking steps, invested thousands of dollars into my training and business in order to maintain the absolute highest standards of professionalism, health care and ethics and this merge would be an insult and a threat to the public and clientele of health care providers. Massage therapy and cosmetology are in complete different categories and the idea of merging them together is laughable and incomprehensible.

Thank you for your time in this matter.

Client name Kaia Van Natta
Form Montana Licensing Reform Task Force
Matter Kaia Van Natta - Rules
Sent July 12, 2026 at 2:52 PM
Due
Submitted July 12, 2026 at 2:52 PM

Kaia Van Natta

Date of birth

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Whitefish, MT 59937

Montana Licensing Reform Task Force

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Full Task Force
Health Care 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?

Hello, I'm writing regarding the proposed merger of the Board of Massage Therapy in Montana.

I have been a Licensed Massage Therapist for over 17 years, helping people heal after surgeries and injuries. LMTs are healthcare workers dedicated to this cause, just like physical therapists, chiropractors, acupuncturists, naturopaths, and more. Merging our massage therapy board with the board of cosmetologists and barbers would be a huge disservice to us! We are not even in the same ballpark, nor are any of our standards the same. If the board of massage therapy is unable to continue operating independently, I would much prefer to see it be combined with other modalities that are more closely related to us, as listed above.

More and more people are seeking out LMTs every day to help restore movement, improve strength, ease pain, and balance their nervous system. It only makes sense to regulate us in the same way as other bodyworkers. Hair stylists and nail techs operate in a totally different realm of beauty, not healthcare, so why would that even be considered as an option? While some LMTs do operate at luxury spas, over 80% of us practice in healthcare clinics providing necessary treatments to ailing bodies.

Merging with the alternative healthcare board could actually be a big help to LMTs and create an improved path for advancing our field of healthcare even more.

Thank you for your careful consideration of this matter.

-Kaia Van Natta, LMT, BCTMB

Client name Amanda Osborne
Form Montana Licensing Reform Task Force
Matter Amanda Osborne - Rules
Sent July 13, 2026 at 9:45 AM
Due
Submitted July 13, 2026 at 9:45 AM

Amanda Osborne

Date of birth		Company	Montana Midwives Association
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Home phone	4064658330		

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Health Care Subcommittee

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Specific person or topic

What are your comments?

see attachment



July 13, 2026

Montana Licensing Reform Task Force
Montana Department of Labor & Industry

Re: Montana Direct-Entry Midwife Licensure Requirements

Dear Members of the Licensing Reform Task Force,

My name is Amanda Osborne, and I am a licensed direct-entry midwife practicing in Helena. I also serve as Vice President of the Montana Midwives Association.

As the Task Force reviews Montana's occupational licensing requirements and considers where state-specific standards may be aligned with national standards, I recognized that Montana's additional licensure requirements for direct-entry midwives could become part of that discussion. Before commenting, I wanted to hear directly from licensed Montana midwives. A survey was distributed to every licensed Montana direct-entry midwife in the state, and nearly 79% responded.

Regarding Montana's additional birth experience requirements beyond the national Certified Professional Midwife (CPM) standard, 61% of respondents supported retaining the current requirements, while 39% believed the CPM requirements alone are sufficient.

Direct-entry midwives are licensed for independent practice immediately upon licensure. Many Montana midwives believe the additional supervised clinical experience required by Montana better prepares new licensees for that responsibility, particularly in rural communities where they may practice with limited access to specialist support.

Thank you for your thoughtful consideration of these comments and for your service to the people of Montana.

Sincerely,

Amanda Osborne, CPM, LM
Vice President
Montana Midwives Association

Client name Debra Shorrock
Form Montana Licensing Reform Task Force
Matter Debra Shorrock - Rules
Sent July 12, 2026 at 10:29 PM
Due
Submitted July 12, 2026 at 10:29 PM

Debra Shorrock

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Home phone	4062416331		

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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?

*I have had my own massage practice in MT for 35 years providing therapeutic massage. In our training we learn to take a medical hx and know contraindications for the health and safety of our clients. We are health care providers. Cosmetologists are not. On their board massage members would be out numbered by members who have no health care background and no understanding of our profession a risk for public health. I support merging as written with the AHCP so we would be regulated by other health care providers. this protects the public.
As an individual practitioner I get referrals and refer to naturopaths and acupuncturists. If we cannot have our own board, the only appropriate merger is with the AHCP. Thank you*

Client name Amanda Osborne
Form Montana Licensing Reform Task Force
Matter Amanda Osborne - Rules
Sent July 13, 2026 at 11:31 AM
Due
Submitted July 13, 2026 at 11:31 AM

Amanda Osborne

Date of birth**Company**

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Health Care Subcommittee

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Specific person or topic

What are your comments?

Dear Members of the Licensing Reform Task Force,

My name is Amanda Osborne, and I am a licensed direct-entry midwife practicing in Helena.

After reviewing the public comments submitted for the July 7 Healthcare Subcommittee meeting, I became aware of the proposal to move regulation of massage therapists under the Montana Alternative Health Care Board. I appreciate the Task Force's commitment to evaluating opportunities for greater efficiency in occupational licensing, and I respectfully ask that you not recommend this change.

The Alternative Health Care Board has a clear mission and has functioned effectively by regulating professions that share common approaches to independent healthcare practice. As a regulated licensee, I have found the Board to be responsive, knowledgeable, and appropriately focused on protecting the public while maintaining reasonable licensure standards.

Adding massage therapy would substantially expand the Board's responsibilities beyond professional licensure. Massage therapy regulation includes establishment licensing, inspections, and operational oversight that are fundamentally different from the Board's current responsibilities. While massage therapists certainly deserve effective regulation, I do not believe the Alternative Health Care Board is the appropriate regulatory home for those additional functions.

In my view, the Alternative Health Care Board is already accomplishing the Governor's stated goals of protecting the public while minimizing unnecessary barriers to professional practice. Expanding the Board's mission in this way risks reducing its efficiency without providing a corresponding benefit to the professions it currently regulates or to the public.

Thank you for considering my comments and for your service to the State of Montana.

Sincerely,

*Amanda Osborne, CPM, LM
Licensed Direct-Entry Midwife
Helena, Montana*

Client name Alisun Bonville
Form Montana Licensing Reform Task Force
Matter Alisun Bonville - Rules
Sent July 13, 2026 at 10:03 AM
Due
Submitted July 13, 2026 at 10:03 AM

Alisun Bonville

Date of birth

Company

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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?

Specific person or topic

What are your comments?

*Attn Chair Etchart--Please see attached letter opposing additional board expansion for the Board of Alternative Health Care.
Thank you,
Dr Alisun Bonville*



962 Stoneridge Drive, #2
Bozeman, MT 59718
Phone: (406) 586-2626 Fax: (406) 586-2676
Web: www.springintegrativehealth.com

7/13/2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

Thank you for your service to Montana and your willingness to undertake this comprehensive review of occupational licensing. Having served for more than seven years on the Montana Alternative Health Care Board, I understand firsthand both the complexity and importance of professional regulation.

I commend Governor Gianforte's ongoing efforts to identify opportunities for modernization while preserving the public protections that licensing systems exist to provide.

Every licensing board ultimately exists for one purpose: protecting the public. Administrative efficiency is important, but it should never come at the expense of informed oversight, professional accountability, or patient safety.

Consolidation should remain a tool used only when it improves efficiency, public protection, or workforce access—not an objective in itself. Boards work because members understand education, standards, discipline, CE, scope, ethics. Those should be reasonably comparable.

I previously served two terms on Montana's Board of Alternative Health Care, where I participated in licensing, discipline, rulemaking, and oversight responsibilities. That experience provided a firsthand understanding of how professional licensing boards protect the public while balancing regulatory responsibilities with access to healthcare professionals across Montana.

With that perspective, I respectfully urge the Task Force not to recommend expanding the Montana Alternative Health Care Board to include additional professions.

The Alternative Health Care Board currently regulates individual healthcare professionals. Its responsibilities center on professional licensure, continuing education, standards of practice, and disciplinary oversight of individual licensees. It does not regulate healthcare facilities or conduct routine facility inspections.

One of the reasons the Alternative Health Care Board functions so effectively is that its responsibilities are appropriately scaled. The Board typically meets fewer than four times each year, with meetings that are focused, efficient, and generally conclude within a few hours. Screening panels and disciplinary matters remain manageable, allowing members to devote appropriate attention to the professions they regulate without imposing an unreasonable burden on volunteer board members.

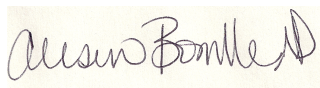
Expanding the Board to regulate an additional profession with substantially different regulatory responsibilities would inevitably increase the time commitment required of current physician, midwife, acupuncturist, and public board members. It would also require those members to spend significant time deliberating on matters outside the education, clinical practice, and regulatory framework for which they were appointed.

The individuals currently serving on the Alternative Health Care Board accepted appointments to oversee professions with comparable healthcare education, clinical responsibility, and regulatory needs. Expanding the Board's jurisdiction would require these volunteer members—including naturopathic physicians, direct-entry midwives, licensed acupuncturists, and the public member—to devote considerably more time to learning, regulating, and making decisions regarding a profession that operates under a fundamentally different regulatory model. That additional burden would diminish one of the Board's greatest strengths: its focused expertise and efficient operation.

Based on my experience serving on the Alternative Health Care Board, I respectfully encourage the Healthcare Subcommittee to preserve a governance structure that has demonstrated efficiency, fiscal responsibility, timely licensing, and effective public protection. Expanding the Board's responsibilities beyond its current scope would not improve these outcomes and could diminish the operational strengths that exist today.

Sincerely,

Dr. Alisun Bonville, ND

A handwritten signature in dark ink on a light yellow rectangular background. The signature is cursive and reads "Alisun Bonville" followed by a stylized "ND" monogram.

Alisun Bonville, ND

drbonville@springintegrativehealth.com

NPI #: 1093044968

License #: AHC-NAT-LIC-801

Client name Elizabeth Stegmaier
Form Montana Licensing Reform Task Force
Matter Elizabeth Stegmaier - Rules
Sent July 13, 2026 at 9:59 AM
Due
Submitted July 13, 2026 at 9:59 AM

Elizabeth Stegmaier

Date of birth

Company

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Home phone 14065525639

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?

Specific person or topic

What are your comments?

Please see attached letter. Thank you!

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

I have practiced as a primary care naturopathic physician in Missoula for more than ten years as part of Providence Medical Group. Working within one of Montana's largest healthcare systems has provided firsthand experience collaborating with physicians, specialists, and other healthcare professionals while caring for patients with a wide range of healthcare needs.

Thank you for your willingness to devote your time and experience to this review of Montana's healthcare licensing system. As a primary care physician, I appreciate the thoughtful work required to evaluate policies that ultimately affect both healthcare professionals and the patients we serve every day.

Governor Gianforte's commitment to reviewing occupational licensing reflects an important objective: ensuring regulations protect the public without creating unnecessary barriers that limit access to healthcare. I support that mission.

Effective licensing boards are fundamental to maintaining public confidence in healthcare professions. Their responsibility extends beyond licensing—they establish standards, oversee continuing competency, and ensure accountability for safe practice.

With those principles in mind, I respectfully encourage the Task Force not to recommend consolidating additional professions into the Montana Alternative Health Care Board.

Massage therapy regulation introduces an entirely different regulatory function through oversight of massage establishments and related inspection responsibilities. That work requires different administrative processes, expertise, and operational resources.

As a physician practicing within Montana's broader healthcare system, I respectfully encourage the Healthcare Subcommittee to preserve a licensing board whose composition reflects comparable educational preparation, clinical responsibility, professional accountability, and standards of patient care. The professions currently regulated by the Alternative Health Care Board share similar expectations for independent healthcare practice, making the Board well suited to its current responsibilities. Maintaining this structure best serves both healthcare professionals and the patients who rely upon them.

Sincerely,

Dr. Elizabeth Stegmaier, ND

Clinic: Providence Primary Care and Integrative Wellness

Address: 1211 S Reserve Street, Suite 101 Missoula, MT 59804

Phone: 406-327-3057

Email: Elizabeth.Stegmaier@providence.org

Client name Elizabeth Allen
Form Montana Licensing Reform Task Force
Matter Elizabeth Allen - Rules
Sent July 13, 2026 at 4:12 PM
Due
Submitted July 13, 2026 at 4:12 PM

Elizabeth Allen

Date of birth

Company

Focus Massage Therapy

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4065707799

Montana Licensing Reform Task Force

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General comment

What are your comments?

Regarding the proposal to merge massage therapists with the cosmetology board. Unlike massage therapists, cosmetologists are not health care providers. They don't have the background knowledge to protect the public health, safety and welfare.

Massage therapists are not OK with being outnumbered on the consolidated board because of 1) this lack of a healthcare background, and 2) the numbers would ensure LMT's don't have the power to protect the public because they could be out-voted by non-healthcare workers.

I have a small business and work in a pilates studio, not a spa.

Regarding the proposal to consolidate with the Alternative Health Care Board (AHCB)- I support this merger as it is written. The AHCB is made up of healthcare workers, which would rightly include massage therapists. Massage therapists don't mind being outnumbered on this board because 1) As it is written each profession has equal representation 2) massage therapy would be regulated by other healthcare workers

Thank you for your consideration, Liz

Client name Eva Wilson
Form Montana Licensing Reform Task Force
Matter Eva Wilson - Rules
Sent July 13, 2026 at 2:47 PM
Due
Submitted July 13, 2026 at 2:47 PM

Eva Wilson

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Home phone	6035530537		

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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?

Letter attached - this is in response to the proposed addition of licensed massage therapists (LMTs) to the Montana Alternative Health Care Board.

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

Thank you for your public service and for taking the time to carefully evaluate how Montana's licensing system can best serve both healthcare professionals and the families who depend upon them.

I appreciate Governor Gianforte's continued efforts to improve workforce participation by removing unnecessary barriers to employment while maintaining the safeguards that protect patients.

For healthcare professions, licensing boards represent an important promise to the public—that practitioners meet established standards of education, competency, and ethics.

I respectfully urge the Task Force *not* to recommend expanding the Montana Alternative Health Care Board to include additional professions, including licensed massage therapists.

I practice naturopathic medicine with a particular focus on primary care for pediatric and adult patients. Every day I work with Montana children and families seeking accessible, relationship-based primary healthcare, giving me a unique perspective on how licensing policies ultimately affect patients' ability to obtain timely care close to home. In doing this work, I see firsthand how important public confidence is to the patient-provider relationship. Families deserve to know that the healthcare professionals caring for them are regulated by a board whose members understand the education, clinical responsibilities, and standards of practice required for independent patient care. Maintaining the current structure of the Alternative Health Care Board best supports that confidence.

Thank you again for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Eva Wilson", with a stylized, flowing script.

Dr. Eva Wilson, ND
Montana Whole Health
2835 Fort Missoula Road Suite 306, Missoula MT 59804
Phone: 406-552-1717
Email: eva@mtwholehealth.com

Client name Jennifer Krieger
Form Montana Licensing Reform Task Force
Matter Jennifer Krieger - Rules
Sent July 13, 2026 at 2:46 PM
Due
Submitted July 13, 2026 at 2:46 PM

Jennifer Krieger

Date of birth

Company

Work email drkrieger@springintegrativehealth.com

Work address 962 Stoneridge Drive Ste#2
Bozeman, MT 59718

Work phone 406-586-2626

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

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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 strongly encourage the Health Care Subcommittee to preserve the current structure of the Alternative Health Care Board.

July 13, 2026
Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee,

Thank you for the opportunity to submit comments and for your willingness to serve Montana through this important review process.

I practice in Bozeman with a clinical focus in integrative oncology and the care of patients facing complex and chronic illnesses. My work frequently involves collaboration with multiple healthcare providers, and offers me the unique perspective on how licensure supports multidisciplinary, patient-centered care for Montanans with serious medical conditions, as well as reinforced for me the importance of thoughtful public policy and well-functioning regulatory systems.

Patients facing life-altering medical conditions deserve confidence that every licensed healthcare professional practicing in Montana is held to appropriate educational, ethical, and professional standards through effective regulatory oversight. The Alternative Health Care Board currently oversees three healthcare professions whose education, independent clinical responsibilities, and regulatory needs are sufficiently similar to allow effective governance by a single board.

Massage therapy follows a distinctly different educational pathway, scope of practice, complaint profile, and regulatory framework than the three professions currently licensed by the Board. Naturopathic physicians complete a four-year doctoral naturopathic medical program after undergraduate education and must pass national licensing examinations before licensure. Licensed acupuncturists complete graduate-level professional education and national certification requirements. Licensed direct-entry midwives must meet nationally recognized competency standards established for their profession. By comparison, Montana's massage therapy licensing requirements involve a different educational pathway and a different scope of practice, with minimum education measured in hundreds of hours rather than a doctoral or graduate professional healthcare program. It is for that reason that I respectfully oppose expanding the Montana Alternative Health Care Board through consolidation with additional licensed professions.

Patients facing serious and medically complex conditions depend upon healthcare professionals who are regulated by boards with appropriate clinical expertise and a clear understanding of healthcare practice. I respectfully encourage the Healthcare Subcommittee to preserve the current structure of the Alternative Health Care Board.

Sincerely,

Dr. Jennifer Krieger, ND

Spring Integrative Health
962 Stoneridge Drive Ste #2
Bozeman, MT 59718
406-586-2626
drkrieger@springintegrativehealth.com

Client name Ingrid Lovitt
Form Montana Licensing Reform Task Force
Matter Ingrid Lovitt - Rules
Sent July 13, 2026 at 5:49 PM
Due
Submitted July 13, 2026 at 5:49 PM

Ingrid Lovitt

Date of birth

Company

Montana Association of
Naturopathic Physicians

Work email manp@montanand.org

Work phone 406-686=3429

Work address

PO 1433
Helena, MT

Montana Licensing Reform Task Force

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

Public Record

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Which committee would you like to receive your comment?

Health Care Subcommittee

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2. Specific people or organizations you think the task force should hear from.

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Specific person or topic

What are your comments?

Please see uploaded PDF



MANP
Montana Naturopathic
— Physicians —

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Committee,

On behalf of the Montana Association of Naturopathic Physicians and our Board of Directors, thank you for your willingness to serve on the Healthcare Subcommittee and for the considerable time you are investing in this important review. Montana benefits when experienced leaders are willing to carefully examine complex regulatory systems while keeping the public interest at the forefront.

Thank you for your efforts to review occupational licensing and welcome the opportunity to share recommendations based on the experience of our profession and the patients we serve.

MANP is the statewide professional association representing Montana's licensed naturopathic physicians. Our members practice throughout Montana in primary care, specialty care, rural communities, and urban centers, serving patients of all ages.

We appreciate Governor Greg Gianforte's continued leadership in examining occupational licensing through the Licensing Reform Task Force. Over the past four years, the Gianforte Administration has consistently sought to reduce unnecessary barriers to work, modernize state government, and strengthen



Montana's workforce while maintaining the public protections that occupational licensing is intended to provide. Those goals are both worthwhile and achievable.

We also recognize the tremendous responsibility entrusted to Montana's professional licensing boards. Their purpose is not simply administrative—it is to protect the health, safety, and welfare of the public while ensuring qualified professionals can enter practice under clear, consistent, and accountable standards.

It is in that spirit that MANP respectfully urges the Task Force not to recommend adding additional professions to the Montana Alternative Health Care Board beyond those it currently regulates.

The Alternative Health Care Board already reflects the type of efficient, right-sized licensing board this Task Force seeks to promote.

- One of the most important conclusions to emerge from the Licensing Reform Task Force's work is that not every licensing board requires restructuring.
- The Montana Alternative Health Care Board is an example of a board that is already functioning efficiently and effectively. It maintains full membership, including its required public member, meets quorum without difficulty, operates with a stable budget, benefits from responsive Department staff, and fulfills its responsibilities for licensing, continuing education, and disciplinary oversight in a timely manner. Board meetings are infrequent because the workload is appropriately scaled, not because important work is left undone.

For these reasons, the Montana Association of Naturopathic Physicians respectfully encourages the Healthcare Subcommittee to recognize the Montana



Alternative Health Care Board as an example of the type of efficient, appropriately sized, and well-functioning licensing board this Task Force was created to identify. We recommend maintaining the Board's current structure and allowing it to continue serving the three healthcare professions it currently regulates.

Sincerely,

Montana Association of Naturopathic Physicians
Board of Directors





Links and References

Healthcare Subcommittee Public Comments:

<https://esd.dli.mt.gov/docs/2026-07-07-Healthcare-Subcommittee-Comments.pdf>

Task Force Website

<https://esd.dli.mt.gov/licensing-task-force/>

Licensing Task Force Healthcare Subcommittee

[AGENDA](#) July 17, 2026 9:00 a.m.

[Zoom Only Zoom Link](#)

Meeting ID: 814 0841 7046 Passcode: 822321



Task Force Members

- [Sarah Swanson](#), Commissioner, Montana Department of Labor & Industry, Chair
- [Sen. Derek Harvey](#), D-Butte
- [Sen. Mark Noland](#), R-Bigfork
- [Sen. Daniel Zolnikov](#), R-Billings
- [Rep. Jodee Etchart](#), R-Billings
- [Rep. Josh Seckinger](#), D-Bozeman
- [Rep. Morgan Thiel](#), R-Sidney
- [Charlie Brereton](#), Director, Department of Public Health & Human Services
- [Eric Strauss](#), Director, Montana Department of Corrections
- [Stacey Anderson](#), Montana Primary Care Association
- [Tanner Avery](#), Frontier Institute
- [Dr. Serena Brewer](#), Montana Medical Association
- [Webb Brown](#), Montana Dental Association
- [Ed Buttrey](#), Montana Hospital Association
- [Bob Dean](#), Montana Contractors Association
- [John Harding](#), Montana Home Builders Association



- [Jennifer Hensley](#), Montana Speech Language Hearing Association, Montana Occupational Therapy Association, Montana Academy of Physician Assistants, Montana Optometric Association
- [Troy Jensen](#), Montana Board of Professional Engineers and Professional Land Surveyors
- [Tony King](#), Montana Pharmacy Association
- [Allen Lloyd](#), Montana Society of CPAs
- [Brad Longcake](#), Montana Dental Hygienists' Association, Montana Funeral Directors Association
- [Kelly Lynch](#), Montana League of Cities & Towns
- [Kristin McColly](#), Montana Board of Nursing
- [Amy Nerison](#), Montana Psychiatric Association, American Medical Response
- [Alison Paul](#), Montana Legal Services Association
- [Sierra Riesberg](#), Behavioral Health Alliance of Montana
- [Jason Small](#), Montana AFL-CIO
- [Gail Tronstad](#), Public Member, Montana Board of Pharmacy

Healthcare: Topics may include healthcare & behavioral health, workforce shortages, telehealth, scope of practice, and rural health.



Rep. Jodee Etchart, Chair

Tony King, Chair

Sen. Derek Harvey

Sen. Mark Noland

Sen. Daniel Zolnikov

Rep. Josh Seckinger

Dir. Charlie Brereton

Stacey Anderson

Serena Brewer

Webb Brown

Ed Buttrey

Jennifer Hensley



Brad Longcake

Kristin McColly

Amy Nerison

Alison Paul

Sierra Riesberg

Jason Small

Gail Tronstad

The Licensing Reform Task Force was established by Governor Greg Gianforte on Jan. 29, 2026. The purpose of the Task Force is to 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 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.



Over the last 10 years, professional and occupational licenses issued in the State of Montana have doubled and the number of occupations subject to professional licensure have increased, but there has been no comprehensive review of existing regulations to determine if those licensing requirements are truly protecting the health, safety, and welfare of Montanans. Reducing barriers to work is a key focus of the Governor's 406 JOBS initiative. The Licensing Reform Task Force aligns with the goals of 406 JOBS, providing a comprehensive review of existing licensing structures to ensure the regulations are necessary, effective, and narrowly tailored to protect the public without unduly burdening the ability to work in the State of Montana.

Client name Lou Walters
Form Montana Licensing Reform Task Force
Matter Lou Walters - Rules
Sent July 13, 2026 at 6:01 PM
Due
Submitted July 13, 2026 at 6:01 PM

Lou Walters

Date of birth

Company

Montana Association of
Naturopathic Physicians

Home email dr.louwalters@gmail.com

Home address

Work phone 4065516175

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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- 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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Which committee would you like to receive your comment?

Health Care Subcommittee

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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?

Please see the attached letter re the alternative health care board.

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

On behalf of the Montana Association of Naturopathic Physicians and our Board of Directors, thank you for your willingness to serve on the Healthcare Subcommittee and for the considerable time you are investing in this important review. Montana benefits when experienced leaders are willing to carefully examine complex regulatory systems while keeping the public interest at the forefront.

MANP is the statewide professional association representing Montana's licensed naturopathic physicians. Our members practice throughout Montana in primary care, specialty care, rural communities, and urban centers, serving patients of all ages. We appreciate the Governor's efforts to review occupational licensing and welcome the opportunity to share recommendations based on the experience of our profession and the patients we serve.

We appreciate Governor Greg Gianforte's continued leadership in examining occupational licensing through the Licensing Reform Task Force. Over the past four years, the Gianforte Administration has consistently sought to reduce unnecessary barriers to work, modernize state government, and strengthen Montana's workforce while maintaining the public protections that occupational licensing is intended to provide. Those goals are both worthwhile and achievable.

We also recognize the tremendous responsibility entrusted to Montana's professional licensing boards. Their purpose is not simply administrative—it is to protect the health, safety, and welfare of the public while ensuring qualified professionals can enter practice under clear, consistent, and accountable standards.

It is in that spirit that MANP respectfully urges the Task Force not to recommend adding additional professions to the Montana Alternative Health Care Board beyond those it currently regulates.

The Alternative Health Care Board already reflects the type of efficient, right-sized licensing board this Task Force seeks to promote.

- One of the most important conclusions to emerge from the Licensing Reform Task Force's work is that not every licensing board requires restructuring. The Montana

Alternative Health Care Board is an example of a board that is already functioning efficiently and effectively. It maintains full membership, including its required public member, meets quorum without difficulty, operates with a stable budget, benefits from responsive Department staff, and fulfills its responsibilities for licensing, continuing education, and disciplinary oversight in a timely manner. Board meetings are infrequent because the workload is appropriately scaled, not because important work is left undone.

For these reasons, the Montana Association of Naturopathic Physicians respectfully encourages the Healthcare Subcommittee to recognize the Montana Alternative Health Care Board as an example of the type of efficient, appropriately sized, and well-functioning licensing board this Task Force was created to identify. We recommend maintaining the Board's current structure and allowing it to continue serving the three healthcare professions it currently regulates.

Sincerely,

Montana Association of Naturopathic Physicians

Client name Claire Michelson
Form Montana Licensing Reform Task Force
Matter Claire Michelson - Rules
Sent July 13, 2026 at 11:08 PM
Due
Submitted July 13, 2026 at 11:08 PM

Claire Michelson

Date of birth

Company Montana Whole Health

Home email claire@mtwholehealth.com

Work address 2835 Fort Missoula Rd # 306
Missoula, MT 59801

Mobile phone 14065290468

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?

Please see attached letter.

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

Thank you for your work reviewing Montana's professional licensing system and your commitment to ensuring regulation both protects the public and supports access to healthcare throughout our state.

As a Missoula native, I chose to return to Montana after completing naturopathic medical school to pursue residency training and begin my career serving the community that raised me. As a physician early in my career, I have a unique perspective on the factors that influence whether healthcare professionals choose to train, practice, and ultimately remain in Montana.

Montana continues to face healthcare workforce shortages, particularly in rural and underserved communities. Recruiting and retaining healthcare professionals requires a regulatory environment that is stable, predictable, and respected by the professions it oversees.

Governor Gianforte's focus on reducing unnecessary barriers to workforce participation is one I strongly support. At the same time, healthcare professionals considering where to establish their careers value clear standards, professional accountability, and confidence in the regulatory systems governing their profession.

For that reason, I respectfully oppose further expansion of the Montana Alternative Health Care Board through consolidation with additional licensed professions. The Board has successfully regulated the healthcare professions currently under its jurisdiction while maintaining public protections and providing a stable framework for professional practice. Preserving that stability supports both public protection and healthcare workforce recruitment.

Thank you for your consideration and for your service to the people of Montana.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Michelson'.

Claire Michelson, ND

Montana Whole Health

Address: 2835 Fort Missoula Rd # 306, Missoula, MT 59804

Phone: (406) 552-1717

Email: drclairemichelson@gmail.com

Client name Dawn Dalili
Form Montana Licensing Reform Task Force
Matter Dawn Dalili - Rules
Sent July 13, 2026 at 6:41 PM
Due
Submitted July 13, 2026 at 6:41 PM

Dawn Dalili

Date of birth

Company

Montana Center for Vibrant Living

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Home phone +14157108737

Work address

400 West Broadway 101-213
Missoula, MT 59802

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?

Specific person or topic

What are your comments?

I am writing to encourage the members of the Healthcare Subcommittee to oppose changes to the composition of the Alternative Healthcare Board. Please see the attached letter.

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attention: Chair Etchart

Dear Chair Etchart and Members of the Healthcare Subcommittee:

Thank you for your service to the State of Montana and for dedicating your time and expertise to this important undertaking. As someone who has spent many years serving a professional organization through both leadership and volunteer service, I recognize the significant commitment required to thoughtfully evaluate complicated public policy questions.

I appreciate Governor Gianforte's efforts over the past four years to identify unnecessary barriers that prevent qualified professionals from entering the workforce while preserving the public protections Montanans rightly expect from professional licensure.

Professional licensing boards exist because protecting patients requires informed oversight by individuals who understand both clinical practice and regulatory responsibility. That balance between public protection and workforce access is essential.

For that reason, I respectfully oppose any recommendation to expand the Montana Alternative Health Care Board through the addition of other licensed professions.

As it currently stands, the Alternative Health Care Board:

- Is financially sound
- Does not have fee concerns
- Is stable and predictable

Expansion would mean:

- Significant increase in board meetings, leading to undue burden on volunteer members
- Significant increase in screening, adjudication, and investigations
- Increased staff and legal support
- Additional rulemaking

I have practiced naturopathic medicine in Montana since 2016 and served the Montana Association of Naturopathic Physicians for eight years as President of the Association. Throughout that time, I worked alongside physicians, regulators, legislators, and healthcare organizations to strengthen the profession while maintaining a commitment to patient safety and high professional standards.

Respectfully, I encourage the Healthcare Subcommittee to preserve a licensing board whose composition reflects comparable graduate-level healthcare education, independent clinical practice, professional accountability, and standards of patient care. Those shared characteristics allow board members to evaluate licensure, continuing competency, and disciplinary matters through a common understanding of healthcare practice. Maintaining the current structure best serves both healthcare professionals and the patients who rely upon them.

From my years of leadership within Montana's naturopathic profession, I have learned that successful governance requires thoughtful, evidence-based decision-making. I respectfully encourage the Healthcare Subcommittee to preserve a board that is functioning well and to reserve future consolidation only for circumstances where it clearly advances public protection, administrative efficiency, or workforce access.

Sincerely,

A handwritten signature in black ink, appearing to read "D M Dalli".

Dawn M. Dalli, ND

Montana Center for Vibrant Living
400 West Broadway 101-213 Missoula MT 59802
Phone: 406-540-4256
Email: hello@mtvibrantliving.com

Client name Lou Walters
Form Montana Licensing Reform Task Force
Matter Lou Walters - Rules
Sent July 13, 2026 at 7:08 PM
Due
Submitted July 13, 2026 at 7:08 PM

Lou Walters

Date of birth

Company

Work email drwalters@thesourcewellnesscenter.com

Home address

Phone

Montana Licensing Reform Task Force

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Specific person or topic

What are your comments?

Please see attached letter from the MANP on the Alternative Health Care Board



MANP
Montana Naturopathic
— Physicians —

July 13, 2026

Licensing Reform Task Force
Healthcare Subcommittee
Attn: Chair Etchart

Dear Chair Etchart and Committee,

On behalf of the Montana Association of Naturopathic Physicians and our Board of Directors, thank you for your willingness to serve on the Healthcare Subcommittee and for the considerable time you are investing in this important review. Montana benefits when experienced leaders are willing to carefully examine complex regulatory systems while keeping the public interest at the forefront.

Thank you for your efforts to review occupational licensing and welcome the opportunity to share recommendations based on the experience of our profession and the patients we serve.

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We appreciate Governor Greg Gianforte's continued leadership in examining occupational licensing through the Licensing Reform Task Force. Over the past four years, the Gianforte Administration has consistently sought to reduce unnecessary barriers to work, modernize state government, and strengthen



Montana's workforce while maintaining the public protections that occupational licensing is intended to provide. Those goals are both worthwhile and achievable.

We also recognize the tremendous responsibility entrusted to Montana's professional licensing boards. Their purpose is not simply administrative—it is to protect the health, safety, and welfare of the public while ensuring qualified professionals can enter practice under clear, consistent, and accountable standards.

It is in that spirit that MANP respectfully urges the Task Force not to recommend adding additional professions to the Montana Alternative Health Care Board beyond those it currently regulates.

The Alternative Health Care Board already reflects the type of efficient, right-sized licensing board this Task Force seeks to promote.

- One of the most important conclusions to emerge from the Licensing Reform Task Force's work is that not every licensing board requires restructuring.
- The Montana Alternative Health Care Board is an example of a board that is already functioning efficiently and effectively. It maintains full membership, including its required public member, meets quorum without difficulty, operates with a stable budget, benefits from responsive Department staff, and fulfills its responsibilities for licensing, continuing education, and disciplinary oversight in a timely manner. Board meetings are infrequent because the workload is appropriately scaled, not because important work is left undone.

For these reasons, the Montana Association of Naturopathic Physicians respectfully encourages the Healthcare Subcommittee to recognize the Montana



Alternative Health Care Board as an example of the type of efficient, appropriately sized, and well-functioning licensing board this Task Force was created to identify. We recommend maintaining the Board's current structure and allowing it to continue serving the three healthcare professions it currently regulates.

Sincerely,

Montana Association of Naturopathic Physicians
Board of Directors





Links and References

Healthcare Subcommittee Public Comments:

<https://esd.dli.mt.gov/docs/2026-07-07-Healthcare-Subcommittee-Comments.pdf>

Task Force Website

<https://esd.dli.mt.gov/licensing-task-force/>

Licensing Task Force Healthcare Subcommittee

[AGENDA](#) July 17, 2026 9:00 a.m.

[Zoom Only Zoom Link](#)

Meeting ID: 814 0841 7046 Passcode: 822321



Task Force Members

- [Sarah Swanson](#), Commissioner, Montana Department of Labor & Industry,
Chair
- [Sen. Derek Harvey](#), D-Butte
- [Sen. Mark Noland](#), R-Bigfork
- [Sen. Daniel Zolnikov](#), R-Billings
- [Rep. Jodee Etchart](#), R-Billings
- [Rep. Josh Seckinger](#), D-Bozeman
- [Rep. Morgan Thiel](#), R-Sidney
- [Charlie Brereton](#), Director, Department of Public Health & Human Services
- [Eric Strauss](#), Director, Montana Department of Corrections
- [Stacey Anderson](#), Montana Primary Care Association
- [Tanner Avery](#), Frontier Institute
- [Dr. Serena Brewer](#), Montana Medical Association
- [Webb Brown](#), Montana Dental Association
- [Ed Buttrey](#), Montana Hospital Association
- [Bob Dean](#), Montana Contractors Association
- [John Harding](#), Montana Home Builders Association



- [Jennifer Hensley](#), Montana Speech Language Hearing Association, Montana Occupational Therapy Association, Montana Academy of Physician Assistants, Montana Optometric Association
- [Troy Jensen](#), Montana Board of Professional Engineers and Professional Land Surveyors
- [Tony King](#), Montana Pharmacy Association
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- [Brad Longcake](#), Montana Dental Hygienists' Association, Montana Funeral Directors Association
- [Kelly Lynch](#), Montana League of Cities & Towns
- [Kristin McColly](#), Montana Board of Nursing
- [Amy Nerison](#), Montana Psychiatric Association, American Medical Response
- [Alison Paul](#), Montana Legal Services Association
- [Sierra Riesberg](#), Behavioral Health Alliance of Montana
- [Jason Small](#), Montana AFL-CIO
- [Gail Tronstad](#), Public Member, Montana Board of Pharmacy

Healthcare: Topics may include healthcare & behavioral health, workforce shortages, telehealth, scope of practice, and rural health.



Rep. Jodee Etchart, Chair

Tony King, Chair

Sen. Derek Harvey

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The Licensing Reform Task Force was established by Governor Greg Gianforte on Jan. 29, 2026. The purpose of the Task Force is to 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 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.



Over the last 10 years, professional and occupational licenses issued in the State of Montana have doubled and the number of occupations subject to professional licensure have increased, but there has been no comprehensive review of existing regulations to determine if those licensing requirements are truly protecting the health, safety, and welfare of Montanans. Reducing barriers to work is a key focus of the Governor's 406 JOBS initiative. The Licensing Reform Task Force aligns with the goals of 406 JOBS, providing a comprehensive review of existing licensing structures to ensure the regulations are necessary, effective, and narrowly tailored to protect the public without unduly burdening the ability to work in the State of Montana.

Client name Jennifer Holloman
Form Montana Licensing Reform Task Force
Matter Jennifer Holloman - Rules
Sent July 13, 2026 at 6:44 PM
Due
Submitted July 13, 2026 at 6:44 PM

Jennifer Holloman

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?

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?

Having the massage therapists move to the Cosmetology and Barber Board and NOT get moved to the Alternative Health Care Board

Dear Members of the Healthcare Subcommittee,

On behalf of the Montana Acupuncture Association, we are writing to oppose the proposal to add Massage Therapy to the Alternative Health Care Board (AHCB). As the association representing licensed acupuncturists across Montana, we have direct experience with the state's regulatory structure, including acupuncture's prior transition from the Board of Medical Examiners to the AHCB.

The AHCB current licensed professions share a regulatory model that does not fit cleanly with massage therapy. Acupuncture, naturopathic medicine, and direct-entry midwifery are regulated as independent health professions with profession specific education, examination, scope of practice, and public protection requirements. Massage therapy, by contrast, requires a minimum 500-hour education program under statute 37-33-502, MCA, followed by a board approved licensing examination. That structure is closer to Montana's other hours-based personal service credentials, such as cosmetology and barbering, than to the clinical regulatory model currently housed under the AHCB.

This alignment is not merely theoretical. In Great Falls, massage therapy, cosmetology, barbering, esthetics, and manicuring are already taught within the same educational institution. That existing educational overlap supports the conclusion that massage therapy is a closer administrative fit with cosmetology and barbering than with the professions currently regulated by the AHCB.

This is not a judgment about the value of massage therapy. It is a governance issue. The licensing frameworks, regulatory needs, and public protection functions are built differently, and a board designed around one model does not fit cleanly around the other.

We also recognize that several current AHCB members are themselves licensed massage therapists in addition to holding licenses in professions already regulated by the AHCB. Their dual licensure provides valuable familiarity with massage therapy; however, individual board members' professional backgrounds do not resolve the broader structural differences in licensing requirements, regulatory workload, premises oversight, and the size of the massage therapy licensee population.

The licensee population this would bring onto the AHCB is also disproportionate to its current scope. The AHCB currently regulates 413 active licenses across its three licensed professions. Massage therapy alone represents 2,082 active licenses, roughly five times the AHCB entire current licensee population. Even if reserved board seats were preserved on paper, the practical burden of complaints, rulemaking, application review, and meeting time would likely be driven overwhelmingly by a profession the AHCB was not originally structured to absorb.

The regulatory function itself would also change adding massage therapist to AHCB. Montana's massage therapy statutes include business premises inspection authority under statute 37-33-406, MCA. That type of establishment or premises oversight has no clear analog in the AHCB current work, which is oriented around individual scope of practice regulation for acupuncturists, naturopathic physicians, and direct-entry midwives. Folding business premises inspection authority into the AHCB would be an unnecessary expansion of what the AHCB does, not simply an addition of new seats.

The Board of Alternative Health Care appears to be functioning well as currently structured. We are not aware of evidence in the Task Force materials showing licensing delays, disciplinary backlog, or administrative dysfunction that would justify restructuring the AHCB under the Task Force's stated goals of improving efficiency, public protection, or workforce access.

For these reasons, we respectfully urge the subcommittee not to recommend adding Massage Therapists (BLMTB) to the Alternative Health Care Board. Massage therapy has a different credentialing structure, a substantially larger licensee population, a different inspection and premises-based regulatory function, and a complaint and workload profile that does not align with the current structure of the AHCB. The Alternative Health Care Board appears to be functioning well as currently organized, and we are not aware of evidence that adding Massage Therapy would improve efficiency, public protection, or workforce access. If Massage Therapy requires a new institutional home, we encourage the subcommittee to place it with the Board of Barbers and Cosmetologists, where its hours-based education model, hands-on personal service setting, business premises inspection authority, sanitation concerns, and client boundary issues are more closely aligned.

Thank you for your consideration and for the work of this subcommittee.

Sincerely,

Jennifer Holloman L.Ac, Legislative Liaison

Written on behalf of The Montana Acupuncture Association

Jacy O'Neill DACM, L.Ac-Executive Director

Mandi Thompson L.Ac – President

Heather Ellsworth L.Ac- Secretary

Jennifer Holloman, L.Ac-Treasurer