Client name	Ari Silverman
Form	Montana Licensing Reform Task Force
Matter	Ari Silverman - Rules
Sent	August 17, 2026 at 11:16 PM
Due	
Submitted	August 17, 2026 at 11:16 PM

Ari Silverman

Date of birth			
Work email	silverman.psychology@gmail.com	**Company**	SHAPE: Scientific Healing, Assessment & Psycho-Education
Work phone	4062205581	**Work address**	111 N Higgins Ave, Suite 204 Missoula, MT 59802-4437

Montana Licensing Reform Task Force

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

Purpose of the Licensing Reform Task Force

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

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

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

Public Record

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

Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

We want to hear from you!

We would like to receive any comments you would like the Task Force, or one of its subcommittees, to review. In addition, we are specifically looking for feedback for:

1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

Specific person or topic

What are your comments?

I am strongly OPPOSED to the proposed consolidation of the Montana Board of Behavioral Health (BOBH) and the Montana Board of Psychologists (BOP).

Psychology is a distinct profession with unique training, ethical standards, and scope of practice. Montana Psychologists have complex skills honed from years of education, training, and experience. It is imperative that self-regulation through our individual professional board remains intact. Having the Montana Board of Psychologists (MBP) ensures that Psychologists are judged by those who have expert knowledge of our field and can maintain high professional standards. Professionals who are not Psychologists do not have the same training or expertise.

The Montana Board of Psychologists (MBP) protects the public and clients of Psychologists by recognizing when peers are cutting corners, breaking rules, and engaging in behaviors that endanger the public. BOP creates public safety by ensuring expert Psychologists are monitoring and addressing issues that arise with licensees. BOP provides the public and licensees with credible and fair investigations into professional misconduct. The BOP is able to judge subtle risks and navigate complex professional issues that may look harmless to someone who is not a Psychologist.

If the Montana Board of Psychologists and the Montana Board of Behavioral Health are combined, risk to the public could increase. The public considers Psychologists to be leaders in the field of mental health, assessment, and scientific study. It is imperative that the board responsible for licensing Psychologists has the expertise, scope of practice, training, and ability to regulate and maintain the high standards the public expects.

Client name	Paisley Azra Lewis
Form	Montana Licensing Reform Task Force
Matter	Paisley Azra-Lewis - Rules
Sent	August 17, 2026 at 7:51 PM
Due	
Submitted	August 17, 2026 at 7:51 PM

Paisley Azra-Lewis

Date of birth		**Company**	
Home email	paisley.rives@gmail.com	**Home address**	
Phone			

Montana Licensing Reform Task Force

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Full Task Force
Health Care Subcommittee

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1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

Specific person or topic

What are your comments?

I am writing to express my opposition to the recommendations for consolidating the Board of Psychology and the Board of Behavioral Health. While I support the goal of improving access to mental health services across Montana, I am concerned that board consolidation will not achieve this goal, and may in fact diminish public safety and erode public trust in the field of psychology. The Board of Psychology plays an important role in ensuring that psychologists licensed in Montana are adhering to the unique ethical standards and practicing within the unique scope of our field. Regulation and oversight by fellow psychologists helps us to maintain the high standards we (and the public) have come to expect. Please consider allowing the Board of Psychology to remain separate from the Board of Behavioral Health. Thank you for your consideration.

Client name	Caroline Williams
Form	Montana Licensing Reform Task Force
Matter	Caroline Williams - Rules
Sent	August 17, 2026 at 7:20 PM
Due	
Submitted	August 17, 2026 at 7:20 PM

Caroline Williams

Date of birth		**Company**	
Home email	caroline.a.williams77@gmail.com	**Home address**	, MT 59718
Phone			

Montana Licensing Reform Task Force

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

Purpose of the Licensing Reform Task Force

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

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1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

General comment

What are your comments?

I am writing to oppose the consolidation of the the Montana Board of Behavioral Health (BOBH) and the Montana Board of Psychologists (BOP). I believe it will hinder the proper oversight of each division of mental health professionals. Psychologists need to oversee psychologists due to the intimate knowledge they have of the profession, which differs in training from master level clinicians. In order to uphold the highest ethical standards, please keep the boards separate.

Client name	Laura Lopach
Form	Montana Licensing Reform Task Force
Matter	Laura Lopach - Rules
Sent	August 17, 2026 at 6:13 PM
Due	
Submitted	August 17, 2026 at 6:13 PM

Laura Lopach

Date of birth		**Company**	Insight Psychological Services
Home email	laura@ipsmt.org	**Home address**	
Phone			

Montana Licensing Reform Task Force

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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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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

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1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

Specific person or topic

What are your comments?

Dear Members of the Task Force,

I write in strong opposition to the proposed consolidation of the Montana Board of Psychologists (BOP) with the Montana Board of Behavioral Health (BOBH), to be considered at your August 21, 2026 meeting.

The Task Force's charge is to remove unnecessary barriers for licensees. The Board of Psychologists is not a barrier — it is a public protection. Consolidation would not speed applications, lower fees, or ease entry into the profession. It would only dilute the specialized expertise needed to regulate psychology safely.

Psychology is a distinct doctoral-level profession with its own training standards, scope of practice, and ethical code, including specialized functions like psychological evaluations that other behavioral health professions are not clearly or consistently trained to perform or supervise. Licensing and disciplinary decisions about psychologists should be made by those qualified to judge that training and scope — not by a combined board where psychologists could be a minority voice. The cost of getting those decisions wrong falls on Montana patients.

I respectfully urge the Task Force to withdraw the consolidation proposal and preserve the Montana Board of Psychologists as an independent board.

Client name	Caitlin A. Martin Wagar
Form	Montana Licensing Reform Task Force
Matter	Caitlin A. Martin-Wagar - Rules
Sent	August 17, 2026 at 4:34 PM
Due	
Submitted	August 17, 2026 at 4:34 PM

Caitlin A. Martin-Wagar

Date of birth		**Company**	
Home email	caitlin.martin-wagar@umontana.edu	**Home address**	6575 Justin Ct Missoula, MT 59803
Home phone	4408320974		

Montana Licensing Reform Task Force

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Purpose of the Licensing Reform Task Force

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Which committee would you like to receive your comment?

Full Task Force

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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?

I am writing to strongly oppose the recommendation to consolidate the Board of Psychology and the Board of Behavioral Health. As a licensed psychologist and psychology educator in Montana, I oppose the proposed consolidation of boards because psychologists have their own unique scope of practice, doctoral-level education and training, and professional standards. As such, combining boards would create a situation where there is insufficient public protection and regulatory expertise. As a scientist, I challenged myself to consider both the pros and cons of combining boards; while the combination could potentially create more administrative efficiency, it should not come at the cost of regulatory expertise and public protection, and I strongly oppose regulatory consolidation (such as a combined board). Only psychologists have the necessary training and expertise to determine what makes a qualified psychologist. Additionally, our scope of practice is beyond that of other mental health providers. As an example, psychological assessment and testing are in the distinct purview of psychologists. A board that is composed of non-psychologists could not adequately handle a complaint involving the inappropriate use of psychological testing, and could not properly consider disciplinary action. Indeed, the American Psychological Association's (APA) formal Resolution on Independence of Psychologists states that the most appropriate licensing and oversight board for psychologists is an independent psychology licensing board. APA endorses independent psychology boards as the preferred structure for some of the reasons described here. Further, states have rarely consolidated their boards of psychologists into more generalist boards, and some that did have since reversed the decision and re-established separate boards (e.g., Colorado). In line with national recommendations and psychologist expertise, the licensure, scope-of-practice, competency, and disciplinary decisions involving psychologists should remain under a psychologist-specific regulatory body. Collaboration and administrative efficiency can coexist with independent professional regulation, and I urge the task force to oppose consolidation of the Board of Psychologists and Board of Behavioral Health. Thank you for your time and consideration, and I know we all share a goal of reducing barriers faced by licensees. Unfortunately, consolidation of boards would not accomplish that goal, but would likely create unintended consequences that could harm the public.

Client name	Kelsey Gilleon
Form	Montana Licensing Reform Task Force
Matter	Kelsey Gilleon - Rules
Sent	August 17, 2026 at 4:00 PM
Due	
Submitted	August 17, 2026 at 4:00 PM

Kelsey Gilleon

Date of birth		**Company**	
Home email	kelseygilleon26@gmail.com	**Home address**	2368 Village Sq Missoula , MT 59801
Phone			

Montana Licensing Reform Task Force

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Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

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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 a practicing clinical psychologist and I strongly OPPOSE the efforts to consolidate mental health licensing boards. I do not think this would acknowledge differentials in education, training, and ethics in practice that set psychologists apart in Montana. Therefore, consolidating the licensing boards would not serve psychologists or the people we work with.

Client name	Adam Moller
Form	Montana Licensing Reform Task Force
Matter	Adam Moller - Rules
Sent	August 17, 2026 at 3:38 PM
Due	
Submitted	August 17, 2026 at 3:38 PM

Adam Moller

Date of birth		**Company**	
Work email	adam@adammollerphd.com	**Work address**	121 W Kagy BLVD STE N Bozeman, MT 59715
Work phone	4065771010		

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?

Hello,

My name is Adam Moller, Ph.D., and I am licensed psychologist in private practice in Bozeman, MT. I strongly OPPOSE the merging of the psychology and behavioral health boards. Psychologists have unique strengths relative to other mental health professionals (other professions have their strengths too) and merging the boards would make it hard for the general public to recognize those strengths without adequate representation. Also, maintaining a dedicated Board of Psychology would ensure that future psychologist's training and qualifications are adequately assessed by those familiar with psychology training programs. Thank you for your time.

Adam Moller, Ph.D.

Client name	Jennifer Robohm
Form	Montana Licensing Reform Task Force
Matter	Jennifer Robohm - Rules
Sent	August 17, 2026 at 3:37 PM
Due	
Submitted	August 17, 2026 at 3:37 PM

Jennifer Robohm

Date of birth		**Company**	
Home email	jsremail@gmail.com	**Home address**	
Phone			

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?

General comment

What are your comments?

I am a clinical psychologist practicing in Missoula. Because psychologists have a different scope of training and a different scope of practice, it does not make sense to consolidate our board with those of other mental health sub-specialties, or to have non-psychologists overseeing psychologists. Doing so would jeopardize our ability to protect the public and ensure competent, ethical psychological practice. Please reconsider this ill-advised idea. Thank you for your time and consideration.

Client name	Michele C. Mc Kinnie
Form	Montana Licensing Reform Task Force
Matter	Michele C. McKinnie - Rules
Sent	August 17, 2026 at 2:16 PM
Due	
Submitted	August 17, 2026 at 2:16 PM

Michele C. McKinnie

Date of birth		**Company**	Big Sky Psychological Consortium, PLLC
Home email	michelecatherine@hotmail.com	**Home address**	725 Oconnell Dr Bozeman, MT 59715
Mobile phone	14065800110		

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 Oppose the recommendation to consolidate the Board of Psychologists and the Board of Behavioral Health.

August 17, 2026

To all members of the Montana Licensing Reform Task Force:

Please oppose the recommendation for the consolidation of the MT Board of Psychologists and the MT Board of Behavioral Health.

I, Michele C. McKinnie, Psy.D., am writing to you as a licensed psychologist working in Bozeman. As a professional in MT for over 24 years, I have observed and participated in the licensing process for psychologists. I strongly believe the current recommendation for the consolidation of the aforementioned boards will cause more harm than good, and I request that you reconsider your recommendations and oppose this plan moving forward. My reasoning, outlined below, addresses several areas of importance.

The BoP has invested significant and successful efforts over the past several years and has greatly reduced barriers to licensure for psychologists in MT. The Board has implemented number rule changes (with opportunities for public comment from licensees and others) in the past few years that have significantly eased the pathways to licensure for psychologists without compromising competence. The current recommendation is a "solution in search of a problem" that will likely create more complex problems in the future.

It is my understanding that licensing boards are in place for the protection of the public through regulating the profession. While consolidation of the BoP and BoBH might look good on paper (logistically) it does not make sense with respect to protection of Montanans and ethical regulation of the professions of Psychology and Behavior Analysts and we have significant concerns this consolidation would increase risk to the public.

The scope of practice between licensees of the Board of Psychologists and the Board of Behavioral Health does overlap in one area – we may provide psychotherapy services. Importantly, psychologists and behavior analysts have specific and unique areas of training and practice that distinguish these groups in meaningful ways from those professions overseen by the Board of Behavioral Health. In many cases, these unique areas of specialized training and practice are the areas that are more likely to trigger board complaints or other legal complications. Unique areas of training and participation include but are not limited to:

a. Forensic evaluations, including competency determinations (not guilty by reason of mental illness)
b. Neuropsychological evaluations for dementia, traumatic brain injuries (TBI), employment accommodations
c. Parenting plan and custody evaluations
d. Academic and autism evaluations
e. Specific behavioral interventions for managing and treating autism and other severe developmental issues in both children and adults

I strongly urge the members of the Licensing Reform Task Force to listen to the professionals who have been sharing their concerns about this issue. Please do not hesitate to reach out to me if you have need of any clarification of the above points. I plan to attend the August 21, 2026 meeting in Butte and would be available for discussion. My direct business phone is (406) 582-1321.

Respectfully,
Michele C. McKinnie, Psy.D.
Michele C. McKinnie, Psy.D.
MT#338
Director of Clinical Training – Big Sky Psychological Consortium, PLLC
www.bigskypsychology.com

Client name	Sarah M. Baxter
Form	Montana Licensing Reform Task Force
Matter	Sarah M. Baxter - Rules
Sent	August 15, 2026 at 9:12 AM
Due	
Submitted	August 15, 2026 at 9:12 AM

Sarah M. Baxter

Date of birth		**Company**	
Work email	sarahbaxterphd@gmail.com	**Home address**	P.O. Box 556 Hamilton, MT 59840
Work phone	4063818802		

Montana Licensing Reform Task Force

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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?

General comment

What are your comments?

Please see the attached letter.

Sarah M. Baxter, Ph.D.
P.O. Box 556
Hamilton, MT 59840
(406)381-8802
sarahbaxterphd@gmail.com

August 15, 2026

To Whom It May Concern:

My name is Sarah Baxter, and I have been licensed as a psychologist in the State of Montana since approximately 1990. During my 36 years of practice, I have primarily worked in the private sector, with a significant portion of my practice focused on parenting plan evaluations and parenting evaluations in other matters.

As you may be aware, this is a highly specialized and complicated area of practice, and one that tends to generate a higher percentage of licensing board complaints than many other areas of psychological practice. I am writing to express my opposition to the proposed consolidation of the Psychology Licensing Board with the Behavioral Health Licensing Board. I have also signed the letter submitted by the Montana Psychological Association, but I am writing separately because of my particular experience and expertise in the area of parenting evaluations.

Board complaints in this area are often made by disgruntled parents who believe they did not receive a fair evaluation. Complaints are also sometimes made when a parent did not, in fact, receive an objective evaluation. Sorting through these complaints and determining whether a psychologist has practiced appropriately is difficult and highly specialized work.

To evaluate such complaints effectively, board members must have an understanding of the various guidelines established by the American Psychological Association, including guidelines addressing parenting evaluations, the use of psychological testing, and forensic practice. They must also be familiar with Montana laws and regulations governing these evaluations, including the applicable Administrative Rules. In addition, ethical standards provide an essential framework for this work, and parenting evaluations in particular involve complex and sometimes competing ethical considerations.

I am concerned that non-psychologists serving on a consolidated board may not have sufficient familiarity with these issues. More importantly, I am concerned that members may not have the specialized knowledge—or the opportunity and willingness to develop the knowledge—necessary to appreciate the subtlety and complexity involved in making crucial licensing decisions in this area of practice.

For these reasons, I believe it is important to maintain a separate Psychology Licensing Board whose members possess the specialized knowledge and experience necessary to appropriately oversee the practice of psychology, particularly in complex areas such as parenting and forensic evaluations. I respectfully urge you to oppose the proposed consolidation of the Psychology Licensing Board with the Behavioral Health Licensing Board.

Thank you for your consideration of this important issue.

Sincerely,

Sarah Baxter, Ph.D.
Clinical and Forensic Psychologist

Client name	Stephanie Burcusa
Form	Montana Licensing Reform Task Force
Matter	Stephanie Burcusa - Rules
Sent	August 14, 2026 at 10:21 AM
Due	
Submitted	August 14, 2026 at 10:21 AM

Stephanie Burcusa

Date of birth		**Company**	
Home email	stephanie.burcusa@gmail.com	**Home address**	
Phone			

Montana Licensing Reform Task Force

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Full Task Force
Health Care Subcommittee

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1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

What are your comments?

Hello! I am writing to share my opposition to the proposed consolidation of the Board of Psychologists with the Board of Behavioral Health. While there is some overlap of scope, Psychology is a distinct profession with unique training, ethical standards, and scope of practice. Montana Psychologists have complex skills honed from years of education, training, and experience. It is imperative that self-regulation through our individual professional board remains intact. Having the Montana Board of Psychologists (MBP) ensures that Psychologists are judged by those who have expert knowledge of our field and can maintain high professional standards. Professionals who are not Psychologists do not have the same training or expertise. Psychologists have complex specialties (e.g., forensic evaluation, neuropsychology, industrial-organizational, school psychology, health psychology) that require peer review to determine if a psychologist acted within their proper scope of practice. It would be unethical to have an individual create the standards, discipline, ethics, determine licensing for individuals who have a different scope of practice than themselves.
Furthermore, the Montana Board of Psychologists is funded by the psychologists it licenses. On July 7, 2026, the Board of Psychologists sought input from people who would be affected by the consolidation of BOBH and BOP. The input that was given by us licensees was that we do not want the boards consolidated.
If the Montana Board of Psychologists and the Montana Board of Behavioral Health are combined, risk to the public could increase. The Montana Board of Behavioral Health is already large and oversees clinical professional counselors (LCPC), clinical social workers (LCSW), licensed marriage and family therapists (LMFT), addiction counselors (LAC), and peer support specialists. The last public board book for the Montana Board of Behavioral Health was 388 pages while the last Board of Psychologists public board book was 15 pages. The public considers Psychologists to be leaders in the field of mental health, assessment, and scientific study. It is imperative that the board responsible for licensing Psychologists has the expertise, scope of practice, training, and ability to regulate and maintain the high standards the public expects.
Thank you,
Stephanie Burcusa

Client name	Arlis G. Wood
Form	Montana Licensing Reform Task Force
Matter	Arlis G. Wood - Rules
Sent	August 13, 2026 at 11:17 AM
Due	
Submitted	August 13, 2026 at 11:17 AM

Arlis G. Wood

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Montana Licensing Reform Task Force

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

Purpose of the Licensing Reform Task Force

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

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

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

Public Record

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

Which committee would you like to receive your comment?

Full Task Force
Health Care Subcommittee

We want to hear from you!

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1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

General comment

What are your comments?

The psychology licensing board is responsible for providing a high level of expertise for Montana. It is the only doctoral level behavioral science board. It must remain independent for the highest quality practitioners.

Client name	Kelsey Stappert
Form	Montana Licensing Reform Task Force
Matter	Kelsey Stappert - Rules
Sent	August 18, 2026 at 3:00 PM
Due	
Submitted	August 18, 2026 at 3:00 PM

Kelsey Stappert

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Phone			

Montana Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

Full Task Force

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1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

General comment

What are your comments?

I request that licensure and competency determinations remain within the profession; therefore, OPPOSE the recommendations to consolidate the Board of Psychology and the Board of Behavioral Health.

A psychologist reviewing a colleague knows what to look for. An evaluator without that background risks missing the signs that matter most, either clearing someone who should not be practicing or penalizing sound clinical decisions that were simply misunderstood. This is why physicians are reviewed by physicians, and attorneys by attorneys. It is not professional gatekeeping — it is the only reliable way to evaluate a profession's practitioners. Psychologists should continue to be held to the same standard.
This is not a matter of convenience, but of public health and safety. Maintaining a separate board for psychologists upholds the profession's high standards and protects the community.

The task force is asked to keep this determination where it belongs, with licensed psychologists.

Client name	Sarah A. Potts
Form	Montana Licensing Reform Task Force
Matter	Sarah A. Potts - Rules
Sent	August 18, 2026 at 1:30 PM
Due	
Submitted	August 18, 2026 at 1:30 PM

Sarah A. Potts

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Montana Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

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

We want to hear from you!

We would like to receive any comments you would like the Task Force, or one of its subcommittees, to review. In addition, we are specifically looking for feedback for:

1. Specific topics a committee or the task force should consider, and
2. Specific people or organizations you think the task force should hear from.

Do you have a general comment or a specific person or topic for the Task Force to hear from?

What are your comments?

I am writing to strongly oppose the recommendation to consolidate the Board of Psychology and the Board of Behavioral Health. I am writing this letter as a private citizen and a psychologist. As a licensed psychologist and psychology clinical trainer in Montana, I oppose the proposed consolidation of boards because psychologists have their own unique scope of practice, doctoral-level education and training, and professional standards. I also do not agree that there are barriers to licensure from the board level as a clinical psychologist in the state of Montana, as the Board of Behavioral Health has been positive to interact with since my licensure. I also share my sentiments in this letter alongside my upmost respect for my dear colleagues who work with licenses within the Board of Behavioral Health. It has been a deep honor to train psychologists, social workers, counselors, community health workers, and medical residents, among other providers, in clinical psychology practice. However, I acknowledge that learning psychology and being a psychologist is quite different.

Only psychologists have the necessary training and expertise to determine what makes a qualified psychologist. Consolidating these boards would create a situation where there is insufficient public protection and regulatory expertise. While I can see how consolidation could provide some efficiency, this would undoubtedly produce unintended costs, such as lack of responsibility and responsiveness for those it's meant to serve (e.g., leaving staff the difficult position of becoming experts in unrelated areas).

A psychologist scope of practice is beyond that of other mental health providers. As an example, psychological assessment and testing is a unique skill for trained psychologists. A psychological assessment is a clinical service and product that helps a patient or another provider better understand and treat a patient. Primary questions that lead to referring a person for an assessment are often around providing assistance with determination, presence, and/or severity of the following (and not limited to): attention-hyperactivity disorder, eating disorder, autism, learning difference/disability, memory impairment, obsessive-compulsive disorder, Tourette's' or tics severe anxiety and/or depression, encopresis/enuresis, chronic pain, or personality disorder. Given the vastness of clinical psychology practice, a board overseeing psychologists needs to be able to deliver appropriate review and discipline; our community at-large benefits from this as well, as our colleagues in medicine and behavioral health recognize the rigor of the psychologist training and license. A board that is composed of non-psychologists could not adequately handle a complaint involving the inappropriate use of psychological testing, diagnosis, and related treatment planning, nor could a consolidated board provide the most appropriate disciplinary action.

The best available recommendation on board construction for psychologists comes from the American Psychological Association's (APA) formal Resolution on Independence of Psychologists that states the most appropriate licensing and oversight board for psychologists is an independent psychology licensing board. APA endorses independent psychology boards as the preferred structure for some of the reasons described here. Further, states have rarely consolidated their boards of psychologists into more generalist boards, and some that did have since reversed the decision and re-established separate boards (e.g., Colorado). In line with national recommendations and psychologist expertise, the licensure, scope-of-practice, competency, and disciplinary decisions involving psychologists should remain under a psychologist-specific regulatory body.

Many requests that come to the Board of Psychology may be from early career psychologists wishing to better understand license requirements or ongoing education requirements, or providers who may wish to better understand an aspect of their licensure as it applies to inter-state agreements (i.e., PSYPACT). Montana's PSYPACT designation as of Fall 2025 now requires the Montana Board of Psychology to exercise additional expertise and consideration subject only to psychologists. I fear board consolidation would not help Montanans when a primary purpose of any licensing board is to protect.

Collaboration and administrative efficiency can coexist with independent professional regulation, and I urge the task force to oppose consolidation of the Board of Psychologists and Board of Behavioral Health. All but two US states have their own regulatory board for psychologists. While I adamantly oppose this consolidation, if the state of Montana were to consider, it would at the minimum need to set forth detailed planning with adequate and sustainable funding, retain existing board members from both boards, review pay structure for board staff to lead to better retention, work with the Board of Medical Examiners to learn how they have balanced their complex licenses (MD/DO/PA) and varied decision-making, and establish unique divisions with licensure representation (e.g., clinical psychologists, BCBAs, social workers, counselors, marriage and family therapists) in each that would respond solely to requests for (1) education, (2) compliance, and (3) investigations.

Thank you for your time and consideration. I believe we all share a goal of reducing barriers faced by licensees. Unfortunately, board consolidation would not accomplish this for psychologists in Montana. Instead, a consolidation is likely to create unintended consequences that could weaken specialized oversight and ultimately harm the public. Given these concerns, I respectfully ask the task force to reconsider this recommendation and preserve a regulatory structure that is outlined by our best available recommendations in the field and best protects Montanans.

Client name	Greg R. Machek
Form	Montana Licensing Reform Task Force
Matter	Greg R. Machek - Rules
Sent	August 18, 2026 at 10:26 AM
Due	
Submitted	August 18, 2026 at 10:26 AM

Greg R. Machek

Date of birth		**Company**	
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Montana Licensing Reform Task Force

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Public Record

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Which committee would you like to receive your comment?

Full Task Force

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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?

I would like to respectfully voice my disagreement with the proposed consolidation of the Montana Board of Behavioral Health (BOBH) and the Montana Board of Psychologists (BOP). I have worked closely with faculty and students from Counseling, Social Work, and Psychology training programs, both through integrated training grant work and through teaching courses. Further, I have been involved with credentialing standards for my subfield (School Psychology) on a state and national level, and have been involved with MPA leadership for the better part of the last decade. From my perspective, these professions – and their training- have very educational standards, accreditation standards, ethical codes, national organizations, and occupy distinct- even though often overlapping- occupational roles.

Consolidating the BOBH and BOP will fail to advance the Task Force's goals of protecting the public and reducing unnecessary regulatory and licensing barriers. Instead, it will create a larger group of heterogenous professionals who have less to offer about, for example, another particular professional's functioning that is not similar to their own. For example, it will create and oversight body where the majority of board members who may be looking into ethical breaches of, say, a Psychologist, have no prior training experience in the field of psychology, particularly in its specific code of ethics. Similarly, when an issue related to counseling practice comes up, it will come in front of a board for which most members are no now longer Counselors. This will be similar for all the distinct subfields under the purview of this new, large, heterogenous board.

Since I work closely with social workers and counselors on a regular basis, I have had occasion to ask their opinion, as well as the opinion of my fellow psychologists. I have actually heard from no one across these professions that thinks this consolidation would be useful or constructive for the functioning of their fields in providing service to the Montana public.

I urge you to oppose consolidation of the Montana Board of Behavioral Health (BOBH) and the Montana Board of Psychologists (BOP).

Thank you for your consideration and your service to the Task Force.

Client name	Duncan Campbell
Form	Montana Licensing Reform Task Force
Matter	Duncan Campbell - Rules
Sent	August 18, 2026 at 9:37 AM
Due	
Submitted	August 18, 2026 at 9:37 AM

Duncan Campbell

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Home phone	14063966566		

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?

Dear members of the Licensing Board Reform Task Force:

I have the privilege of 20+ years of work as a University of Montana educator who trains Montana psychologists. I write today in my personal capacity as a private citizen and licensed psychologist.

I disagree respectfully with the Task Force subcommittee's recommendation to consolidate the Montana Board of Behavioral Health (BOBH) and the Montana Board of Psychologists (BOP). Having taught graduate students from Counseling, Social Work, and Clinical Psychology, I have seen first-hand how each profession has distinct training and educational standards. These differences result in unique sets of strengths that serve Montana's health care needs.

Consolidating the BOBH and BOP will fail to advance the Task Force's goals of protecting the public and reducing unnecessary regulatory and licensing barriers. Indeed, the Montana BOP, in its current composition, is best poised to vet prospective and practicing Montana psychologists, assuring that these professionals practice in accord with the Psychology-specific code of conduct, ethical and professional standards, and profession-wide competencies. Complaints from the public about psychologists' alleged misconduct regarding psychology-specific competencies and scope of practice need to be reviewed and adjudicated by fully informed, similarly-trained professionals. A Task Force decision that imposes a different process risks harm to the public.

During my career as a licensed Montana professional, the MT BOP has aimed to refine licensure procedures and create a path for prospective licensees that is free of unnecessary burden. In its current form as an independent body, the BOP has excelled at its aim. It has done so while simultaneously maintaining high profession-wide standards and ensuring protection of the public.

In closing, it is instructive and important to note that no Psychologist with whom I have spoken believes that board consolidation is a suitable path forward for Montanans' mental and behavioral health. For that reason among many more, I urge you to oppose consolidation of the Montana Board of Behavioral Health (BOBH) and the Montana Board of Psychologists (BOP).

Thank you for your consideration and your service to the Task Force.

Respectfully,
Duncan G. Campbell, PhD
Missoula MT

Client name	Carrie Johansson
Form	Montana Licensing Reform Task Force
Matter	Carrie Johansson - Rules
Sent	August 18, 2026 at 8:52 AM
Due	
Submitted	August 18, 2026 at 8:52 AM

Carrie Johansson

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Work phone	406-513-8671		

Montana Licensing Reform Task Force

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Which committee would you like to receive your comment?

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?

General comment

What are your comments?

I am writing to strongly oppose the recommendation for the Montana Board of Psychology to become part of a consolidated Mental Health Board. This recommendation neither decreases barriers for licensure, nor increases public safety.

Speaking from experience, I obtained my Montana Psychology License #5080 2 years ago with ease and expediency once I had met the proper requirements (I was coming in from another state where I have been licensed over 20 years).

Regarding public safety, a combined board likely INCREASES safety risks to the public and barriers to care for our state residents. Psychologists function from a substantially different and higher level of requirements and regulations than master's level clinicians and should be treated as a distinct group. In addition, there have been barriers to care for our state residents that were helped with the passage of PsyPact legislation specific to psychologists (allowing for increased telehealth access) that I fear could be jeopardized with a combined board.

Please consider OPPOSING the combined board.

Respectfully submitted, Dr. Carrie Johansson

Client name	Amy S. Davis
Form	Montana Licensing Reform Task Force
Matter	Amy S. Davis - Rules
Sent	August 18, 2026 at 8:08 AM
Due	
Submitted	August 18, 2026 at 8:08 AM

Amy S. Davis

Date of birth		**Company**	Providence St. Patrick Hospital
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Mobile phone	12069314097		

Montana Licensing Reform Task Force

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Full Task Force
Health Care Subcommittee
Barriers Subcommittee

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Do you have a general comment or a specific person or topic for the Task Force to hear from?

Specific person or topic

What are your comments?

I am writing to express my strong opposition to the proposed consolidation of the Board of Psychology with the Board of Behavioral Health. The risks to public safety in combining boards far outweigh the benefits of so doing. Psychologists have unique scopes of practice, training and specialized education, and only other psychologists are able to: certify that a licensee has met the requirements of licensure for MT, adjudicate any complaints as needed, and be able to understand another peer's professional behavior and decision making. I urge the Board to preserve an independent Board of Psychology for MT as best professional practice as well as the best interests of the public.