Client name	Sarah A. Potts
Form	Montana Licensing Reform Task Force
Matter	Sarah A. Potts - Rules
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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
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.