



LICENSE TO THRIVE

An examination on occupational licensing challenges and strategies for minimizing barriers to entry

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Executive Summary

Occupational licensing is a system meant to protect public health, safety, and welfare by requiring individuals to have the necessary qualifications to work in certain professions. The Montana Code Annotated sets the rules for this system and includes many licensing boards and programs. However, this system can create barriers that prevent some people from entering licensed careers.

Licensing is an important part of economic regulation, covering professions such as architecture, law, and healthcare. Over 1,100 licensed occupations exist nationwide, but fewer than 60 are licensed in every state. Some jobs requiring licenses may not warrant this level of regulation, such as florists or travel guides, raising questions about the need for licensing.

Licensing requirements help establish minimum standards to ensure quality, professionalism, and safety for the public within various occupations. However, criticisms suggest that current regulatory oversight may benefit license holders more than consumers. While some licensed occupations, like doctors, clearly require competency to avoid personal injury, others lack a strong justification for requiring a license.

Barriers to licensing include regulatory inconsistencies across states, financial challenges, and educational hurdles. The Institute for Justice has studied barriers to entry into low- and medium-wage occupations, finding that applicants typically face a year of education, experience, and average fees of \$295. A comparison shows that Montana has less stringent licensing barriers than many other states, though this can still restrict access to certain professions.

Montana has enacted various measures to reduce licensing barriers, such as interstate compacts, provisional licenses, and substantial equivalency, alongside initiatives like promoting registered apprenticeships and other training programs. However, there are more opportunities to improve access and workforce growth.

Financial burdens remain a significant barrier for potential licensees. Recommendations include introducing fee waivers for low-income individuals or veterans, creating sliding scale fees based on income, or establishing grant and loan programs for those seeking licensure. Loan assistance or forgiveness programs for healthcare professions in rural areas illustrates one approach to making licenses more accessible.

Montana provides an environment with 99,000 active licenses, equating to about 17.6% of the labor force, aligning with national trends. However, disparities in training and experience requirements compared to other states create additional hurdles for new applicants.

This white paper emphasizes the need for regular reviews of licensing requirements to ensure a balance between public safety and professional accessibility. It also suggests improving collaboration with educational institutions to align training with licensing needs, while advocating for new initiatives to help alleviate financial and educational barriers for those entering licensed professions.

Introduction

Occupational licensing is an essential regulatory mechanism intended to safeguard public health, safety, and welfare by ensuring that individuals possess the necessary qualifications to practice various professions. The Montana Code Annotated (MCA) establishes this intent and declared policy throughout Title 37, the section of law that governs occupational licensing, and has established numerous occupational licensing boards and programs to oversee the practice of these professions. This regulatory framework, however, often presents significant barriers to entry, hindering individuals from pursuing careers in licensed professions. This white paper provides a history of occupational licensing, reviews the reasons for and against licensing, discusses the various barriers to entry, and provides potential strategies for reform to create a more inclusive professional landscape.

History

Occupational licensing regulation history dates back nearly 4,000 years. The Babylonians regulated unprofessional conduct for medical practitioners, and the Han, Tang, and Song Dynasties in China utilized competency examinations for state jobs to determine job proficiency.¹ Later, in China, these examinations expanded to other occupations, such as dentistry and medicine. Licensing regulation found its way to Europe in the 13th and 14th centuries with “medieval guilds” that were responsible for overseeing entry into trades, similar to today’s professional associations and licensing boards.² Here in the United States, the foundations of occupational regulation were rooted in the colonial times, albeit initially limited to only three occupations: doctors, lawyers, and ship pilots.³

Early Americans: willing to impose restrictions on their occupational freedom to decrease the probability of encountering bad actors

Since the formation of our country, occupational licensing regulation has grown considerably. However, the fundamentals were set by our founding fathers in several ways, primarily by establishing boundaries around apprenticeships, allowing states to regulate occupations, creating examination and other occupational capacity standards, and promoting mobility. Prior to the adoption of the 14th Amendment in 1868, there were very few occupations that were licensed in modern-day terms, as the country recognized that licensing should be reserved to regulate activities that cause harm to others, to raise revenue, and to provide public health and safety.⁴

Present-day occupational licensing regulation began in the late 1870s, after adopting the 14th Amendment, or the equal protection clause. At that point in the United States, 37 states were admitted to the Union, and more than half required licenses to practice as a physician, dentist, pharmacist, or

¹ Alicia Plemmons & Edward Timmons, Regulation and Economic Opportunity: Blueprints for Reform, 121-122, (The Center for Growth and Opportunity at Utah State University, 2020)

² Id at 122-123.

³ Robert E. Wright, *Occupational Liberty and Licensing before the US Civil War*, in 37-2 Journal of Policy History, 114 (2025).

⁴ Id at 121-123.

lawyer. The process for licensing regulation had standardized as well. State Legislatures created licensing boards comprised of members from the profession, appointed by the Governor, and either the Legislature or the board, empowered by the Legislature, enacted licensing requirements for the given profession in order for individual practice.⁵

Requirements were standard among the states and typically involved formal education, experience through apprenticeships or internships, proof of competency through examinations, and evidence of moral turpitude. Licensing boards had the power to regulate all aspects of the license applicants and licensees, from application review, exam preparation, and setting the pass rate to receiving and adjudicating complaints.⁶

In the early 1900s, the United States economy mainly relied on manufacturing jobs, so only 4-5% of occupations required a license. By mid-century, however, the economy had shifted to more service-oriented positions, and the percentage of occupations subject to a license increased to roughly 25%. Occupational licensing is now one of the nation's key forms of economic regulation.

The Prevalence of Occupational Licensing

Occupational licensing requirements are widespread throughout our economy. Licensed occupations include architecture, engineering, law, real estate, and various health-related positions. However, according to an estimation by the White House, while states regulate more than 1,100 occupations, fewer than 60 of those occupations are licensed in every state.⁷

Furthermore, while obvious professions like healthcare are licensed to protect public health and safety, as our forefathers intended, others defy that logic. Examples of these occupations include auctioneers, florists, interior designers, taxidermists, travel guides, and upholsterers. Even more unique occupations that have been subject to licensing requirements (although not in Montana) have been cat groomers, chimney sweeps, fortune tellers, frog farmers, jai alai participants, lobster sellers, rainmakers, and reptile catchers.⁸

Why Even Have Occupational Licenses?

The classic justification for occupational licensing is what's known as "information asymmetry"⁹, which means that a consumer lacks the knowledge or expertise to judge the qualifications of a professional, so there must be some metric on which the consumer relies. Licensing requirements are those metrics, and licensing boards set floors or minimum qualifications that an individual must meet to obtain a professional license. This helps reduce consumers' uncertainty about the quality of service they will

⁵ Paul L. Larkin Jr, *Public Choice Theory and Occupational Licensing*, in 39-1 Harvard Journal of Law & Public Policy, 210, 213 (2015)

⁶ Id at 213.

⁷ Department of Treasury Office of Economic Policy, Council of Economic Advisers, Department of Labor, in *Occupational Licensing: A Framework for Policymakers*, 4 (2015)

⁸ Paul L. Larkin Jr, *Public Choice Theory and Occupational Licensing*, in 39-1 Harvard Journal of Law & Public Policy, 210, 218 (2015)

⁹ Id at 222

receive when engaging with licensed professionals. Or put another way, “minimum qualification standards [enable] consumers to separate the doctors from the quacks.”¹⁰

In addition to the consumer protection element, licensing enhances an occupation’s professionalism, which benefits the public and workers. “The professionalization process takes on a variety of forms, including the establishment of uniform curricula, standards, and certifications. By improving education and training and establishing strong signals of quality that give consumers more confidence in the profession, members of an occupation can benefit both themselves and the general public.”¹¹

Finally, if there is confusion between similar professions to clarify the scope of practice, licensing can help delineate the professions. Researchers at the Institute for Law and Economics explain this “Occupational Arms Race” as follows:

Occupations do not always come with tasks that are clearly distinct from those of other occupations. In many instances, there is substantial overlap, such as between physical therapists and athletic trainers, or between advanced practice registered nurses and physicians. In a world without occupational licensing, this overlap would not pose any regulatory issues.

But when at least one occupation is licensed – with an exclusive statutory right to conduct a set of tasks – occupations with overlapping functions will also have an interest in becoming licensed. Members of these occupations that seek licensure are not necessarily attempting to benefit at the expense of consumers but may simply be defending their ability to work against the earlier-licensed incumbents by organizing and obtaining a fully authorized scope of practice. Conversely, the earlier-licensed incumbent professionals may be attempting to maximize their earnings and employment at the expense of the less-privileged profession.¹²

Criticisms of Licensing

Conversely, occupational licensing has been criticized on several grounds. The most common has been that regulation benefits the licensees over the consumers when it should be the other way around. As stated in the introduction, the MCA provides the intent of occupational licensing to protect public health, safety, and welfare¹³. This certainly makes sense for certain occupations, such as healthcare and law, where the risk of personal injury is high if an individual is incompetent or unqualified; hence, these occupations are the oldest licensed occupations.

Nevertheless, more than 1,100 occupations are licensed today, many of which pose no risk of personal injury, regardless of the quality. Consider the list of licensed occupations given above. While individuals should acquire some training to perform each job, it is questionable how a license protects the public’s

¹⁰ Tzirel Klien, *Occupational Licensing: The Path to Reform through Federal Courts and State Legislatures*, in 59-2 *Harvard Journal on Legislation*, 428, 432 (2022)

¹¹ Ryan Nunn and Gabriel Scheffler, *Occupational Licensing and the Limits of Public Choice Theory*, in 4:2 *Administrative Law Review Accord*, 25, 31 (2019)

¹² *Id* at 32

¹³ 37-1-202, MCA

health, safety, and welfare. Instead, occupational licensing and scope of practice within professions limit the number of service providers, allowing the members of a given trade to avoid competition and raise prices without supplying the corresponding service quality improvement promised to consumers. “The more services a profession can provide, the more potential streams of revenue. The fewer professions that can also provide it, the less competition there is to bid down the price.”¹⁴ As stated in a study published by the Harvard Journal of Law & Public Policy:

*Occupational licensing restrictions can result in more than two million fewer jobs nationwide, with an annual cost to consumers of more than \$100 billion. Moreover, government regulators or law enforcement officials enforce licensing rules, sometimes through criminal law, and tax dollars fund the salaries and expenses of those officials. The result is that consumers lose twice from licensing requirements – through higher prices and higher tax bills – and the beneficiaries do not incur the transaction costs and enforcement.*¹⁵

Additionally, licensing regulation is inconsistent between states, industries, and occupations. As stated earlier, over 1,100 occupations are licensed, but only 60 are universally licensed across all states. Moreover, the licensing standards for the commonly licensed occupations are not always universal. Inconsistencies create barriers to entry for potential licensees looking to enter the profession or relocate to another state. If the barriers are too high, the industry suffers from workforce shortages, which hurts consumers. A shortage of professionals in critical fields such as healthcare leads to reduced access to services and increased costs.

Barriers to Entry

There are four primary categories of barriers to entry for occupational licensing: regulatory barriers, financial barriers, educational barriers, and economic and social barriers.

Regulatory Barriers

Regulatory barriers include inconsistent regulations between states, industries, and occupations. While some occupations have national standards, most do not, and as discussed earlier, many occupations are not licensed in every state, making it difficult for an individual to understand what is required for licensure or even if licensure is required. Geographic mobility was one of the founding fathers’ original goals of occupational licensing, yet restrictions on out-of-state applicants and reciprocity issues have made this increasingly difficult. Other regulatory barriers include the complexity of licensing processes, lengthy application timelines, outdated licensing requirements (think moral turpitude), and restrictive licensing standards relative to other states.

Furthermore, licensure requirements tend to change over time, and while it appears easy for licensing boards to ratchet up, or increase the requirements, boards tend to be resistant to ratchet back as it may be seen as “watering down” the profession. “With all the forces of professional regulation working in one direction, it’s only a matter of time before reasonable barriers to entry designed to protect the

¹⁴ Rebecca Haw Allensworth, *The Licensing Racket*, 48, (Harvard University Press, 2025)

¹⁵ Paul L. Larkin Jr, *Public Choice Theory and Occupational Licensing*, in 39-1 *Harvard Journal of Law & Public Policy*, 210, 220 (2015)

public from incompetence become something more. We should be skeptical about claims that today it takes 6000 hours of training to protect the public when it only took 1500 in 1988.”¹⁶

Since licensing requirements are typically governed by statute, once the requirements are established, they remain in effect until amended by the Legislature. The Legislature meets every other year in Montana, so burdensome licensing requirements may create unnecessary barriers unless these statutes are regularly monitored. “[once] enacted, laws do not fade away. Absent an expiration date, laws remain in effect until they are repealed or held unconstitutional, giving rise to what has been called ‘the tyranny of the status quo.’ Problems may be transient, but the statutes passed to remedy them may last forever.”¹⁷

Financial Barriers

Financial barriers to entry are relatively straightforward. There is a cost associated with obtaining occupational licensure. However, how much that cost truly is, is not so straightforward. Individuals must consider the costs of training or education for a particular occupation along with any licensing fees and associated costs, such as examination fees, initial application fees, continuing education costs, and renewal fees. Some occupations require a four-year college degree or higher, which could mean student loans, leading to years of potential financial instability. There is also the possibility of the financial cost being too much of a burden for some people to attempt to enter a given field.

Educational Barriers

Similar to financial barriers, educational barriers to entry exist within occupational licensing and vary depending on the occupation. Each license type has different required qualifications including formal education and training. The availability and accessibility of the required training programs can create a barrier to entry for individuals, especially in a state like Montana, where there aren’t as many trade schools, community colleges, or universities as in a more populous state. If a licensing board does not recognize alternative qualifications and experience in place of education or accept distance education or apprenticeships, applicants may be deterred from seeking licensure.

Economic and Social Barriers

Economic disparities may restrict access to licensed professions. As discussed above, the high costs associated with education, training, examinations, and licensing fees may deter capable individuals from considering and pursuing careers in specific fields. Social barriers such as inadequate access to quality education, mentorship, and professional networks may also inhibit occupational licensing.

When faced with economic and social barriers and lacking any opportunity for assistance, low-income or other marginalized populations may not seek these skilled positions, which generally result in stable careers with higher wages. Lower barriers could open doors for these populations to a broader range of career opportunities, enhancing the workforce and communities.

¹⁶ Rebecca Haw Allensworth, *The Licensing Racket*, 40-41, (Harvard University Press, 2025)

¹⁷ Paul L. Larkin Jr, *Public Choice Theory and Occupational Licensing*, in 39-1 *Harvard Journal of Law & Public Policy*, 210, 225 (2015)

Licensing creates a system of haves and have-nots...

As summarized by Rebecca Allensworth, author of *The Licensing Racket*:

[licensing] laws benefit those who can jump through the hoops of licensure and hurt workers who are for various reasons unable to do so. Most of the time, this benefits people who already have advantages in life. As an intervention in the labor market, it's regressive. There are some important qualifications, however, to that observation. For groups that are often discriminated against: women, African Americans, and immigrants, having a license is an even bigger boost within the job market than it is for their white, male, nonimmigrant counterparts. In other words, licensing creates a system of haves and have-nots within groups of marginalized workers: it's especially good for those who can jump through the hoops, and especially bad for those who can't.¹⁸

¹⁸ Rebecca Haw Allensworth, *The Licensing Racket*, 85, (Harvard University Press, 2025)

Institute for Justice Research

The Institute for Justice has performed comprehensive research on barriers to entry, primarily on low- and medium-wage occupations¹⁹, for over a decade, using five common types of licensing requirements: fees, education and experience, examinations, fees, minimum age, and minimum grade completed in school.²⁰ Other requirements, such as good moral character or bonding or insurance requirements, were not included in the study as those requirements are less common, so they did not appear statistically significant.²¹



According to the most recent version of the study (version 3, published in 2022), licensing for low- to medium-wage occupations requires close to one year of education and experience, at least one exam, and an average of \$295 in fees. Since 2017, when the Institute for Justice published its previous version of the study, education and experience have decreased slightly (22 days on average), while fees have risen slightly (\$15 on average), indicating that while there have been some efforts at reducing barriers to entry, burdens remain for these license types²²

Relative to Montana licensing, and when looking at burdens by occupation on a national level, athletic trainers, direct-entry midwives, cosmetologists, and barbers rank in the top half of the list as having high barriers to entry:²³

Rank (Change from 2017)	Occupation	States Licensed	Average Fees	Average Estimated Calendar Days Lost ²⁴	Average Exams	Average Min. Grade ²⁵	Average Min. Age ²⁶
3 - (0)	Athletic Trainer	49	\$546	1,460	1	0	4
7 ▼(-3)	Midwife, Direct-Entry	37	\$1,821	892	1	11	9
24 ▲(6)	Cosmetologist	51	\$179	342	2	7	13
30 ▲(4)	Barber	51	\$167	319	2	6	13

¹⁹ The occupations in the Institute for Justice study that the DLI license are athletic trainer, direct entry midwife, cosmetologist, barber, esthetician, crane operator, massage therapist, pharmacy technician, manicurist, emergency medical technician, and security guard.

²⁰ The Institute for Justice notes that since many licenses impose multiple kinds of fees, education and experience, and exams, the study aggregates the requirements by type.

²¹ Institute for Justice, *License to Work*, V3, 2022, 9.

²² Id at 17.

²³ Id at 18.

²⁴ Estimated calendar days lost is the conversion metric the IJ study uses when accounting for education and experience requirements comprised of multiple forms (hours/years of experience, college credits, etc.)

²⁵ Because this is an average, if no minimum age is required, the state is assigned a zero value in this category.

²⁶ Because this is an average, if there is no minimum grade requirement, the state is assigned a zero value in this category.

Based on the Institute for Justice study, Montana ranks among the country’s least burdensome states – 48th of 51 (including the District of Columbia). Appendices A and B show a breakdown of Montana’s licensed occupations included in the study. Montana only licenses 32 of the 102 occupations included in the study and ranks 21st for average burdens:²⁷

Montana Occupational Licensing



Appendix B provides the Institute for Justice’s analysis of some of the department’s licenses. While the Institute for Justice’s research is promising for Montana, it is only a small sample, as the report provides data on only ten of nearly 150 licenses²⁸ issued by the department.

Montana’s Efforts to Reduce Barriers

The Institute for Justice ranks Montana as a lower-burden state because Montana has already embraced some of the suggestions to lower regulatory barriers. The following section highlights two policy reform suggestions that Montana has already implemented.

Removing and Improving Geographic Barriers

Not recognizing other states’ licenses is often a significant barrier to entry for a licensee interested in relocating or practicing in another state. As discussed earlier, licensing requirements vary by state, sometimes drastically, making it difficult for the licensee and the licensing authority to determine if an individual is appropriately qualified to practice in the new jurisdiction. States have worked to remove this barrier by enacting interstate compacts, entering into reciprocity agreements, and establishing substantial equivalency provisions in either rule or statute.

²⁷ [Montana - Institute for Justice](#); accessed 4/24/25.

²⁸ See Appendix C for a complete list of licenses and endorsements issued by the DLI or its attached licensing boards

The Legislature has passed 12 interstate compacts for occupational licensing, starting with the 2015 session, and the department currently has over 22,000 active licenses through those compacts:

Interstate Compact	Year Enacted ²⁹	# of Compact Licensees
Medical Licensure Compact	2015	2,968
Enhanced Nurse Licensure Compact	2017	19,014
Physical Therapy Compact	2017	502
Audiology & Speech-Language Pathology Compact	2023	0
Interstate Counseling Compact	2023	0
Occupational Therapy Compact	2023	0
Physician Assistant Compact	2025	New
Psychology Interjurisdictional Compact	2025	New
Respiratory Care Compact ³⁰	2025	New
Interstate Massage Compact ³¹	2025	New
Dietitian Compact	2025	New
Total Number of Compact Licensees:		22,484

The department also has reciprocity agreements with other states for electricians and plumbers:

Profession	States with reciprocity agreements (As of 2023)
Journeyman Electrician	AK, AR, CO, ID, IA, ME, MN, NE, NH, NM, ND, OK, SD, TX, UT, WI, WY
Journeyman Plumber	ID, OR, ND, SD

Along with reciprocity and endorsement provisions, the department has been focusing on standardizing licensing across boards and programs and substantial equivalency standardization to address mobility barriers to entry. During the 2023 and 2025 legislative sessions, the Legislature passed key legislation to enable the department to assist in those efforts.

HB 101 (2023; Rep. J. Gillette): Revises licensing reciprocity provisions for out-of-state practitioners licensed by the Board of Behavioral Health; establishes that licensure in another state is sufficient to obtain Montana licensure in certain instances.

HB 583 (2023; Rep. B. Barker): Provides licensing and certification reciprocity for military members, spouses, and veterans.

²⁹ The department is still in the process of establishing the compact databases for the compacts enacted in the 2023 legislative session. All three are on track to be available for compact licensure by the end of 2025.

³⁰ Montana is one of 4 states that has adopted this compact (along with AL, IA, WA). The compact will become effective when 7 states pass legislation adopting the compact.

³¹ Montana is one of 5 states that has adopted this compact (along with AR, NV, OH, VA). The compact will become effective when 7 states pass legislation adopting the compact.

HB 246 (2025; Rep. E. Buttrey): Standardizes substantial equivalency determinations in professional licensing; defines “substantial equivalency” for use across all boards and programs; allows boards to consider work experience when reviewing out-of-state applications.

HB 414 (2025; Rep. J. Etchart): Creates a standardized procedure for provisional licenses across all boards and programs and allows for temporary licenses under certain conditions.

The department’s and the Legislature’s efforts over the past several years have significantly reduced the geographic barrier to licensure entry.

Improve Access to Licensure through Alternative Methods

Another way Montana has reduced barriers to entry is by improving access to licensure through alternative methods, primarily through legislation expanding the registered apprenticeship program, on-the-job training incentive programs, and licensure by experience.

HB 308 (2017: Rep. C. Schreiner): Created the employer apprenticeship tax credit, including an increased credit for employing veterans. An employer who employs an apprentice or veteran apprentice as a new employee in a state-registered apprenticeship training program is eligible for an annual \$750 (apprentice) or \$1500 (veteran apprentice) credit against income taxes.

SB 90 (2021: Sen. J. Small): Allows psychologists to be licensed by experience and no discipline in other jurisdictions.

HB 41 (2023: Rep. J. Bergstrom): Expanded the Incumbent Worker Training Program to increase the per-worker grant amount to \$2,500, remove the 50-employee maximum requirement for an eligible employer, and revised award disbursement based on employer size.

HB 245 (2023: Rep. S. Vinton): Expanded the Incumbent Worker Training Program to increase the per-worker grant amount to \$2,500, remove the 50-employee maximum requirement for an eligible employer, and revised award disbursement based on employer size.

HB 583 (2023: Rep. B. Barker): Revised the tax credit for trades education and training by expanding the list of qualifying trades eligible for the credit and extending the termination date. Relative to occupational licensing, boiler operators, dental hygienists, emergency medical technicians, paramedics, and pharmacy technicians were added to the list of eligible occupations.

HB 336 (2025: Rep. C. Schomer): Requires a board or program to grant a license to an applicant who completes a nationally recognized apprenticeship program.

Strategies for Easing Barriers to Entry

Much research has been done on licensing barriers to entry over the last 50 years, with the consensus that maintaining the status quo is not the best strategy for success. Several states have looked at licensing reform, primarily from a regulatory standpoint, and following a recommended framework issued in a briefing by the White House in 2015.³²

The following sections discuss key reforms that would ease barriers to entry for individuals seeking occupational licensing while maintaining public protections. The goal is to balance ensuring public health, welfare, and safety, as the MCA prescribes and encourage growth in Montana’s workforce.

Regulatory Reforms

Review of State License Requirements for Barriers; Adjust and Repeal as Necessary

According to the department’s licensing bureau, just over 99,000 Montana residents have active DLI-issued licenses, representing about 17.6% of the labor force,³³ which is in line with national statistics on the licensing status of the civilian labor force.³⁴

Some licenses require qualifications similar to those of other states or even have national standards for education and examinations to ensure a basic level of proficiency for licensed workers. Others require training and costs that far exceed those of other states. Higher licensing fees, more exams, more experience or training, and the unavailability of endorsement or reciprocity all create barriers to entry for a potential licensee.

Additionally, some licenses are required in Montana but not required in other states, which creates another barrier to entry. In *The Licensing Racket*, author Rebecca Allensworth defines professional licensing as “a government-granted privilege to work that’s given after a significant investment in human capital measured in months or years, without which professional practice is illegal.” She goes on to argue that professional licensing regulation adds cost to services without proof of increased quality of service, creates barriers to entry and mobility restrictions, and creates scarcity for services. “It’s time to recognize that it should be a regulatory intervention of last resort, not a way to regulate three hundred professions and one-fifth of the American workforce, as we do now.”³⁵

Keeping Allensworth’s argument in mind, when the department reviews licenses and licensure requirements, the department should query each license first to determine if licensing is truly necessary – that is, if the license program exists to benefit the public, as intended, or the licensees. If there is no inherent risk of public health, safety, or welfare in a licensed profession, the department

³² See Department of Treasury Office of Economic Policy, Council of Economic Advisers, Department of Labor, in *Occupational Licensing: A Framework for Policymakers*, 4 (2015)

³³ As of 4/28/2025, the licensing bureau’s licensing system Accella at DLI showed just over 150,000 active licenses, with roughly 99,000 licenses having a Montana address. This figure does not include contractor, home inspector, or building code registrations. The labor force participation data dashboard on the DLI website shows that the March 2025 employment for Montana was 560,312. (99,000/560,000 = 17.6) [Labor Force Participation Data Dashboard](#); accessed 4/28/2025.

³⁴ See *Bureau of Labor Statistics: Certification and licensing status of the civilian noninstitutional population 16 years and over by employment status, 2024 annual averages*; accessed 4/29/25.

³⁵ Rebecca Haw Allensworth, *The Licensing Racket*, 193-194, (Harvard University Press, 2025)

should look at what alternatives exist, such as premise inspections or bonding & insurance requirements, to ease restrictions, and therefore reduce barriers to entry.

By providing a middle path where the government regulates not through onerous educational or testing requirements but directly through codes and inspections . . . licensing has a better chance of halting the spread of professional licensing than an all-or-nothing deregulatory approach, even if it does not stop governmental intervention when consumer protection calls for it.³⁶

The Knee Regulatory Research Center at West Virginia University hosts an interactive database³⁷ of licensing requirements across the states for various occupations. While not all occupations are available, it helps compare standard licensing requirements. Using acupuncture as an example, just looking at Montana’s neighboring states for a handful of requirements, Montana appears to be less burdensome than its neighbors due to lower licensing fees, fewer exams and less experience required, and the availability of endorsement:

State	Initial Licensing Fee	Degree	Number of Exams	Experience or Training	License Renewal Fee	Reciprocity or Endorsement
Idaho	\$200	Masters	6	1725 hrs.	\$150	Endorsement
Montana	\$125	Masters	4	1000 hrs.	\$100	Endorsement
North Dakota	\$350	Masters	5	2625 hrs.	\$200	Endorsement
South Dakota ³⁸	\$300	Doctorate	1		\$200	Reciprocity
Wyoming	\$1,100	Masters	5	1850 hrs.	\$900	Endorsement

Appendix D compares 24 occupations licensed in Montana to a dozen neighboring states and analyzes how comparatively burdensome Montana’s licensing requirements are. The department can use this analysis as a starting point to review the licensing criteria for these occupations and determine what requirements may be adjusted to lessen the barriers to entry.

It is important to note that not all of the same potential barriers to entry were reviewed for each occupation. The Knee Regulatory Research Center collects data points on many licensing requirements, such as good moral character, continuing education, criminal history, and citizenship status. These licensing requirements were not evaluated in the Institute for Justice study. However, some occupations have standardized licensing requirements. For example, an occupation may require the same degree, number of exams, or amount of experience. In those instances, additional criteria were considered since fees, exams, and experience provide only a snapshot of the barriers to entry for a given occupation.

³⁶ Rebecca Haw Allensworth, *The Licensing Racket*, 197, (Harvard University Press, 2025)

³⁷ See Knee Regulatory Research Center at West Virginia University Occupation Database: [CSOR](#); last updated 2/7/25.

³⁸ An acupuncture license is not offered in South Dakota. Medical doctors, osteopaths, and chiropractors are able to practice acupuncture with additional training, testing, or certification. [CSOR](#); accessed 5/1/2025.



An analysis of the data shows that Montana’s licensing requirements mostly align with its neighboring states. When comparing the requirements, there is little variance, as seen by the number of tied scores in the rankings. The tables on the following pages summarize the data provided in Appendix D.

Occupation	# of Rankings ³⁹	Montana's Rank	Least Burdensome State(s)	Most Burdensome State(s)
Acupuncture ⁴⁰	6/10	T2	Colorado	Wyoming
Audiologist	4/12	T4	Colorado Nevada	Montana Oregon
Chiropractor	6/12	T4	Nevada Colorado	Washington Nevada
Certified Public Accountant	4/12	T3		South Dakota
Dental Hygienist	6/12	4	North Dakota	Nevada
Dentist	6/12	T3	Oregon Nevada	California Nevada
Family & Marriage Therapist	5/12	T3	Nevada	California Colorado Oregon
Hearing Aid Dispenser	7/12	7	South Dakota	Montana
Journeyman Electrician ⁴¹	5/10	5	Nebraska	Montana
Journeyman Plumber ⁴²	5/9	4	Idaho	Nevada Utah
Landscape Architect	6/12	1	Montana	Washington
Morticians & Funeral Directors	5/12	5	California Utah	Montana
Nurse Practitioner	6/12	T2	South Dakota	California
Occupational Therapist	7/12	1	Montana	Washington
Optometrist	7/12	T5	Colorado	Nevada Washington
Pharmacist	5/12	T4	Colorado Utah	California Washington
Physical Therapist	7/12	T3	Colorado	California Wyoming
Private Investigator ⁴³	6/8	T3	Washington	Nevada
Professional Engineer	5/12	T2	Colorado	Nebraska
Psychologist	7/12	6	Colorado	Nevada
Sanitarian ⁴⁴	6/8	T2	North Dakota	California
Speech-Language Pathologist	5/12	5	Colorado Nevada	Montana Oregon
Veterinarian	6/12	T4	Colorado	California

³⁹ Rankings show the number of unique scores out of the number of states that issue a license.

⁴⁰ Nevada and South Dakota do not license acupuncturists.

⁴¹ California and Nevada do not license journeymen electricians.

⁴² California, Nebraska, and Wyoming do not license journeymen plumbers.

⁴³ Colorado, Idaho, South Dakota, and Wyoming do not license private investigators.

⁴⁴ Colorado, Nevada, South Dakota, and Wyoming do not license sanitarians.

Least Burdensome Occupations	Most Burdensome Occupations
Acupuncture	Audiologist
Landscape Architect	Hearing Aid Dispenser
Nurse Practitioner	Journeyman Electrician
Occupational Therapist	Morticians & Funeral Directors
Professional Engineer	Speech-Language Pathologist
Sanitarian	

Suggested Methods to Review - Priorities

Because there are so many licenses, each with different qualifications, a thorough review will take time, and it's important to establish a clear plan for review with timelines, objectives, and actionable outcomes. The department could work on this internally over the next one or two interims. However, the department is seeking to establish a licensing reform advisory council focusing on licensing board and individual license relevancy. If this advisory council is established, the department should leverage the stakeholder feedback collected, and council work performed during the 2025-2026 interim for potential policy changes.

As a matter of course, the department could begin its review by first looking at the most burdensome occupations, based on the data already provided in the Institute for Justice and Knee Regulatory Center's research, to see what improvements are possible to lower barriers to entry for applicants. Some of the occupations listed in the research are broad, and the department may issue several license types; for example, the licensing requirements for a physical therapist are included in the research, but the department also licenses physical therapist assistants. During the review, both licenses should be analyzed to see what barriers exist, what could be adjusted, and whether both licenses are necessary.

Another approach the department could take to work through all the myriad license reviews is to look at occupations where not all states issue licenses. Most of the licenses the department issues also exist in other states, but some are unique to Montana. For example, Montana is the only state licensing crane operators in our neighboring states. Nationwide, only nine other states license crane operators.⁴⁵ Clinical lab science, speech-language audiology, dentistry, direct-entry midwife apprenticeships, and specialized veterinary technicians are other examples of licenses in Montana that are not prevalent in many other states. Appendix E provides a table of occupations licensed in Montana but rarely licensed elsewhere.

A final strategy to consider when prioritizing occupations is for the department to establish general categories for the licensing boards and then review the occupations according to the priority of the overarching category. Appendix F suggests categorizing occupations into four general categories: healthcare, community and social services, professional services, and trades. Because occupational licensing aims to protect public health, safety, and welfare, if the department opts for this approach, the healthcare category should be prioritized over the others.

⁴⁵ The other states that license crane operators are Connecticut, Hawaii, Massachusetts, Minnesota, New Jersey, New Mexico, New York, Pennsylvania, and Rhode Island.

Sunrise & Sunset

In conjunction with the individual license review process outlined above, the department should develop recommendations for the state to establish “sunrise” and “sunset” policies for licensing. Sunrise reviews analyze newly proposed occupational licenses before legislative introduction, and sunset reviews require periodic reviews of all licenses for continued relevancy.

As of 2020, the Council of State Governments identified 14 states that utilize sunrise review.⁴⁶ Utah became the 15th state in 2022. Sunset reviews are more common than sunrise reviews. Sunset reviews began in earnest in the 1970’s and at one point, over half the states had some form of sunset review process in place.⁴⁷

Historic Timeline of Sunset Reviews

- 1970s – States began implementing sunset reviews
- 1980s – 36 states passed legislation creating a sunset review process
- 1990s – Six states repealed their laws, and many more turned away from formal sunset reviews
- 2000s and onwards – More individualizes “program evaluation” processes become more popular with states interested in evaluating the successes and challenges of specific programs

States have distinct processes for sunrise review. For example, most states perform a sunrise review on every occupation type, while Nebraska, Virginia, and Washington only utilize sunrise reviews on health occupations. Other key differences include what entities can request a sunrise review, the standards for licensure, application contents, report contents, who compiles and reviews the report, and timelines for the process.⁴⁸

While each state is slightly different in its approach to sunrise reviews, there are commonalities in the primary objectives. According to a 2022 study by the Institute of Justice⁴⁹:

- Most sunrise laws acknowledge balancing public safety with open occupational entry.
- All sunrise laws require a showing of harm to justify regulation.
- All sunrise laws ask reviewers to weigh the costs and benefits of proposed regulations.

⁴⁶ The 14 states that utilize sunrise review are Arizona, Colorado, Florida, Georgia, Hawaii, Idaho, Maine, Minnesota, Nebraska, Ohio, Vermont, Washington, and West Virginia.

⁴⁷ National Conference of State Legislatures, *Sunset and Sunrise in Occupational Licensing Policy*, <https://www.ncsl.org/labor-and-employment/sunset-and-sunrise#Body>, (Updated Nov. 6, 2022).

⁴⁸ *Sunrise Review Processes by State*, National Center for Interstate Compacts, The Council of State Governments (Dec. 7, 2020), <https://compacts.csg.org/sunrise-review-processes-by-state/>

⁴⁹ Kathy Sanchez, Elyse Smith Pohl & Lisa Knepper, Too Many Licenses? Government “Sunrise” Reviews Cast Doubt on Barriers to Work, 8-11, 2022.

- Many sunrise laws require reviewers to recommend and encourage legislators to enact the least restrictive regulation to address the identified harm.

Considerations for Sunrise and Sunset Policy in Montana

There are many things to consider when establishing sunrise and sunset review policies. The National Conference of State Legislatures (NCSL) recommends consideration of the following key components⁵⁰:

1. **Where will the process be housed?** Sunrise and sunset review processes can exist within the legislative branch through a legislative committee, the audit division, the executive branch, an agency or advisory committee, or an independent state office, such as the State Auditor's Office. When determining the office responsible for this process, the department should consider staffing requirements, budgetary needs, and the relationship between branches of government. Appendix G briefly summarizes the different entities that various states use for reviews.
2. **Determining sunrise and sunset statutory criteria.** The new sunrise review policy should outline specific criteria for all new occupational licensing requests. Similar to the objectives listed above, the policy should, at a minimum, seek to answer the following:
 - a) Is the public currently being harmed by unregulated practice?
 - b) Can that harm be measured or demonstrated?
 - c) If the occupation were regulated, would the public see benefits in terms of health and safety?

The sunset review policy should be similar to the sunrise review policy, except the objective here is primarily to determine if the continuation of licensing is necessary and, to a lesser extent, to look for opportunities to modify the licensing program. The policy should, at a minimum, address whether:

- a) the unregulated practice of the occupation or profession creates a direct, immediate hazard to the public health, safety, or welfare;
- b) the scope of practice is readily identifiable and distinguishable from the scope of practice of other professions and occupations;
- c) the occupation or profession requires a specialized skill or training for which nationally recognized standards of education and training exist;
- d) the qualifications of licensure are justified;
- e) a public benefit is provided by licensure;
- f) licensure significantly increases the cost of service; and
- g) public support exists for licensure.

⁵⁰ National Conference of State Legislatures, *Sunset and Sunrise in Occupational Licensing Policy*, <https://www.ncsl.org/labor-and-employment/sunset-and-sunrise#Body>, (Updated Nov. 6, 2022).

3. **What is the timeline?** Timing differs among the states that perform sunrise reviews, as do the people or entities allowed to request a review. Some states allow individuals or industry organizations to submit review applications, while others restrict the process to legislators. Depending on the originating request, timelines differ for completion of the review process, and some states have set application deadlines to allow ample time for due diligence and reporting out to the Legislature before a session.

For sunset reviews, a key feature in some states⁵¹ is the inclusion of an automatic termination section in the authorizing legislation for licensing programs. The sunset review body reviews licenses before their termination, when the Legislature may choose to reauthorize the license. Sunset laws provide a systematic process to evaluate a license to determine if the merits of the license justify its continuation, continuation with modification, or termination. Licenses subject to sunset review automatically terminate (sunset) if legislation to continue the license is not approved by the Legislature and Governor.

Other states may have termination dates for entire boards instead of individual licenses or may have a policy that establishes a rotating schedule for regular review of all entities under the review authority's purview.

4. **What will the report look like?** The review process involves an in-depth assessment using the statutory criteria identified in Step 2. The assessment should include:
- a) Data collection and analysis, such as gathering quantitative and qualitative data on the occupation's impact on public safety and consumer protection; assessing the economic implications of licensing, including costs to practitioners and benefits to the public; and comparing licensing requirements in other states;
 - b) An evaluation of alternatives, other regulatory measures such as registration, accreditation, or voluntary certification programs, or enhanced industry or self-regulation; and
 - c) Stakeholder engagement to ensure the review process is comprehensive and inclusive.
- The final report should summarize the information obtained in the assessment and highlight the potential impacts of licensing the occupation on public safety, consumer protection, and the economy. Additionally, the report should include a final recommendation to the Legislature on licensing options.

⁵¹ In addition to Montana, states that allow sunset clauses to be attached to specific legislation are Idaho, Michigan, Minnesota, Nebraska, Nevada, New Jersey, New York, Virginia, and Wisconsin (as of 2010). Source: Brian Baugus and Feler Bose, *Sunset Legislation in the States: Balancing the Legislature and the Executive*, Mercatus Research, Mercatus Center at George Mason University, (August 2015), 5.

5. **What will the reporting process and voting look like?** Once the sunrise or sunset review report is complete, the policy should designate how the report will be presented to the Legislature for consideration on introduction as a bill proposal. States differ in their approach to this, and the report's timing may play a role in determining the review committee. For example, suppose sunrise review reports must be completed for presentation to a legislative review committee by September 1, years prior to a legislative session. In that case, the Economic Affairs Interim Committee may be an appropriate review committee. Alternatively, the Legislature could establish a Licensing Review Committee to evaluate the reports or allow legislation proposals to move forward regardless of the report findings but require a completed report on a given occupation before introducing a bill.

The department can examine existing states' processes to determine the avenues that may suit Montana. Appendix H provides a list of current states performing sunrise reviews with links to applicable statutes, along with a resource for sunset legislation comparison.

Financial Solutions

As stated earlier, the financial cost of obtaining an occupational license is a significant barrier to entry for many potential applicants. Aside from the educational cost, most occupations have an application fee, an initial license fee, and at least one examination fee. Then, there are license renewal fees and potential costs associated with continuing education. The department should look at opportunities to lessen the financial burden for license applicants and existing licensees and encourage more individuals to pursue licensed occupations.

Review Costs Associated with Licensing Examinations

As a first step toward developing financial solutions for barriers to entry, the department and boards should perform a comprehensive review of the cost associated with professional licensing. The review should consider both the monetary and time commitments associated with licensing examinations. Multiple examinations require a longer time commitment from the license applicant, which may discourage applicants, and result in higher monetary costs for the applicant, for exam preparation materials and fees. Examinations also impose a cost on the department, as staff is required to administer the examinations.

As presented in the regulatory barriers section, many boards require multiple examinations prior to licensure, and the exam requirement varies between states. The variation may be an indication that not all examinations are necessary to ensure public health and safety in the profession. A comprehensive review of costs associated with licensing examinations will help the department and individual boards to determine if statutes or rules should be amended to reduce this cost.

Fee Waivers for License Applicants

One way to assist with the financial cost for licensing is to implement fee waivers for certain license applicants. Two states have enacted fee waiver policies to address financial barriers to entry:

Arizona: HB 2372 (2017) requires state agencies to waive the fee for anyone making an initial application for an occupational license if that person has a family income below 200 percent of the federal poverty level.⁵²

Florida: HB 615 (2017) exempts the following individuals from paying the state fee to apply for an occupational license:

- Active-duty members of the armed forces
- Spouses of members of the armed forces
- Surviving spouses of deceased members of the armed forces
- Floridians who have incomes below 130 percent of the federal poverty level⁵³

Like Arizona and Florida, the department could seek legislation or enact rules to provide financial assistance for license applicants, ensuring that more individuals can pursue their professional goals.

⁵² Public Chapter 323, State of Arizona, May 22, 2017. <https://apps.azleg.gov/BillStatus/BillOverview/69213>

⁵³ Public Chapter 135 of 2017, State of Florida, June 26, 2017.
<https://www.flsenate.gov/Session/Bill/2017/615/Analyses/h0615z1.CCS.PDF>

The assistance could be as simple as fee waivers for specific populations, such as the military, based on income, or both.

Sliding Scale Fees Based on Income for Licensing Applicants

The department may consider a sliding scale fee system along with fee waivers. Implementing sliding scale fees based on income for licensing applicants can ensure that the cost of obtaining a license is proportionate to the applicant's financial situation. This approach recognizes the economic disparities among individuals and seeks to create a fairer and more accessible licensing process.

Grant, Scholarship, and Loan Programs for Prospective Applicants

Another method to alleviate the financial burden of occupational licensing is through grants, scholarships, and loan programs specifically tailored for prospective applicants. These financial aids can provide crucial support to individuals who might otherwise be unable to afford the costs of licensing exams, study materials, and preparatory courses.

- **Grants:** Non-repayable funds awarded to applicants based on financial need, academic merit, or other criteria. Grants can help cover the costs of licensing applications, training programs, and related expenses.
- **Scholarships:** Financial awards given to individuals pursuing specific career paths or demonstrating exceptional promise.
- **Loan programs:** Low-interest loans designed to support prospective licensees. These programs can offer flexible repayment terms, allowing individuals to focus on their careers without immediate financial pressure.

The department and licensing boards may consider loan, grant, or scholarship programs for financial assistance to prospective licensees. As part of the possible development process for these programs, the department and boards should collaborate with external stakeholder groups and educational institutions to determine existing programs and opportunities to leverage funding.

In addition to, or as an alternative to developing new loan, grant, or scholarship programs, the department could develop a communications plan to educate the public on the availability of existing programs. Through the department's website, either on the workforce services page or the individual board pages, the department could provide information and links to programs for applicants and licensees.

For example, the U.S. Department of Veterans Affairs administers the Health Professional Scholarship Program⁵⁴, the National Military Family Association offers scholarships for military spouses⁵⁵, and the Health Resources & Service Administration administers scholarships and loan repayment programs

⁵⁴ U.S. Department of Veterans Affairs, *VA Scholarship Programs*, [About HPSP - Veterans Affairs Scholarship Program](#), (accessed 7/23/2025).

⁵⁵ National Military Family Association, *Licensing + Certification Resources*, [Licensing + Certification Resources - National Military Family Association](#), (accessed 7/23/2025).

for health careers.⁵⁶ Information on these multi-professional programs could be housed on the workforce services website.

License-specific opportunities could go onto individual board pages as well as the workforce services website. For example, the American Occupational Therapy Foundation's website lists over 50 scholarships available for occupational therapy students⁵⁷, Study.com lists over a dozen scholarships for real estate and real estate appraisers⁵⁸, and the American Association of Career Schools' website shows nearly 20 scholarship programs for barbering, cosmetology, esthetics, and massage therapy.⁵⁹

Providing a repository of opportunities for financial assistance is a simple, low-cost method to help ease barriers to entry.

Loan Forgiveness Programs

The federal government offers several loan forgiveness programs for nurses and other healthcare workers. All 50 states either provide some type of state-level student loan forgiveness or act as a liaison for national programs. State programs typically require residency and time commitment to practice in the state. The primary goal of these loan forgiveness programs is to place applicants in healthcare deserts, either state-designated medically underserved areas (MUA) or federally designated health professional shortage areas (HSPA).

Montana's loan repayment program (**Montana SLRP**) is administered through the Department of Public Health and Human Services (DPHHS) and focuses on primary care providers working at approved National Health Service Corps or Montana SLRP practice sites in HPSAs. The Health Resources and Services Administration funds Montana's SLRP with matching state and community funds. Awards are up to \$25,000 per year to repay approved educational loan debt in exchange for a minimum of two years of full-time service at an approved practice site. Part-time awards are also available.⁶⁰

⁵⁶ Health Resources & Services Administration, *National Health Service Corps Loan Repayment*, [Loan Repayment | NHSC](#), (accessed 7/23/2025).

⁵⁷ The American Occupational Therapy Foundation, *AOTF Scholarship Program*, [AOTF > Scholarships > Available Scholarships](#), (accessed 7/23/2025).

⁵⁸ Study.com, *Real Estate Scholarships & Grants*, [Real Estate Scholarships & Grants](#), (accessed 7/23/2025).

⁵⁹ American Association of Career Schools, *Grants and Scholarships Resources*, [Grants & Scholarships For Cosmetology Students | AACCS](#), (accessed 7/23/2025).

⁶⁰ Montana Department of Public Health and Human Services, *Montana State Loan Repayment Program (SLRP)*, [MT Student Loan Repayment Program](#), (accessed 7/20/2025).

MONTANA SLRP ELIGIBILITY:

Eligible Disciplines:

- Physician (MD or DO)
- Dentist (DDS or DMD)
- Certified Nurse-Midwife (CNM)
- Registered Dental Hygienist (RDH)
- Health Service Psychologist (HSP)
- Licensed Clinical Social Worker (LCSW)
- Psychiatric Nurse Specialist (PNS)
- Pharmacist (Pharm)
- Registered Nurse (RN)
- Substance Abuse Disorder Counselor
- Physician Assistant (PA)
- Marriage and Family Therapist (MFT)
- Licensed Professional Counselor (LPC)
- Nurse Practitioner (NP)

Eligible Practice Types:

- Family Medicine
- General Pediatrics
- General Internal Medicine
- General Geriatrics
- General Psychiatry
- Obstetrics/Gynecology

**Preventative medicine is an accepted discipline; emergency medicine is not*

Most states’ loan forgiveness programs apply to nurses, dentists, and primary care physicians, but several states have expanded programs for other healthcare professions.⁶¹ The department could seek to work with DPHHS to further expand the current SLRP, using data on licenses by county to determine if there is a need to develop an incentive or assistance program in the following areas:

Profession	Other state programs
Audiologist	Hawaii , New Mexico
Behavioral Analyst	Hawaii , North Dakota
Chiropractor	Hawaii , Iowa , Mississippi , Ohio , Washington
Clinical Laboratory Science	Hawaii
Emergency Medical Technician	Hawaii , New Mexico , Texas
Genetic Counselor	Hawaii

⁶¹ Vivian, *Healthcare Education Loan Forgiveness: A State-by-State Guide*, [Healthcare Education Loan Forgiveness: A State-by-State Guide | Vivian Community Hub](#), 3/6/2023 (accessed 7/17/2025).

Profession	Other state programs
Licensed Practical Nurse	Florida , Illinois , Minnesota , New York , Vermont
Naturopathic Physician	Hawaii , Washington
Nurse Anesthetist	Alabama , Hawaii , Minnesota , Missouri , North Dakota
Nursing Education	Alabama , Illinois , Maine , Mississippi
Occupational Therapist	Hawaii , Maryland , Nebraska , New Mexico , Texas
Physical Therapist	Hawaii , Maryland , Nebraska , New Mexico , Texas
Podiatrist	Hawaii , Mississippi
Psychologist or Psychiatrist	Alabama , Colorado , Hawaii , Illinois , Louisiana , Massachusetts , Michigan , Minnesota , Nebraska , New Hampshire , New Mexico , North Dakota , Oregon , Pennsylvania , Tennessee , Utah , Vermont
Radiologic Technologist	Hawaii , New Mexico
Registered Dietitian	Hawaii
Respiratory Care Practitioner	Hawaii , New Mexico
Speech-Language Pathologist	Maryland , New Mexico , Texas
Veterinarian	Arizona , Colorado , Iowa , Kentucky , Maine , Mississippi , New Mexico , North Dakota , Oklahoma , Texas

Additionally, the department and licensing boards could seek to develop a new loan forgiveness program that includes professions not currently eligible in the DPHHS program. A new loan forgiveness program could be structured for all healthcare providers, specific focus, such as public health, providers committing to work in a rural setting, or even providers committing to work in specialty healthcare centers, such as veterans' homes & clinics⁶², or assisted living facilities⁶³.

If the department or licensing boards choose to explore this recommendation, the department or boards should consider an appropriate funding source. Many of these loan forgiveness programs utilize matching funds from private organizations. Other programs impose an additional fee on

⁶² The state of Illinois' [loan forgiveness program](#) is limited to medical providers who work in the state's veterans' homes. Hawaii also has a [loan forgiveness program](#) specific to VA health professionals.

⁶³ The state of Minnesota has a specific [loan forgiveness program for long term care nurses](#).

license renewals⁶⁴ or utilize alternative funding methods, such as specialty license plate fees⁶⁵ or appropriation from other tax programs like a tobacco trust fund.⁶⁶

Adjustments to Existing Incentives

A final consideration to ease financial barriers to entry is to review the existing incentive programs for possible revisions. The department already administers the Incumbent Worker Training Program, the Registered Apprenticeship Program, and the Job Growth Incentive Program. These programs should be evaluated to determine if there is an opportunity for increased incentives for employers, additional qualifying career paths, or other changes that can improve the program, lessen the financial burden for employees and strengthen the industry.

⁶⁴ The state of [Michigan's Board of Nursing Nurse Scholarship Program](#), the state of [Florida's Nursing Student Loan Forgiveness Program](#) and the state of [Missouri's Nursing Education Incentive Program](#) are supporting by nursing licensing fees.

⁶⁵ The North Carolina Foundation for Nursing administers the [Mary Lewis Wyche Fellowship](#), which is funded through the 'First in Nursing' license plate program.

⁶⁶ The state of [Michigan's tobacco trust fund](#) includes funding for nursing education, and the state of [North Carolina's tobacco trust fund](#) provides funds for tuition assistance, training, and educational supplies for new jobs in the agricultural industry.

Educational Initiatives

While states have primarily focused on regulatory reform when seeking to reduce barriers to entry for occupational licensing, there may also be opportunities to reduce educational barriers. These opportunities can also tie in with the financial incentives discussed above, such as scholarships, grants, or loans to assist with the required training or education for a profession.

The following are examples of other states' recent efforts to address educational barriers. While the department does not regulate all professions in the legislation summaries below, the policies may inspire potential program development in Montana.

Alabama

[2023 AL S 57](#): Creates the Alabama Loan Repayment Program for Nursing Education, provides program funding from the Education Trust Fund, and awards loans to applicants who contract with the board to work as an instructor in a pre-licensing nursing education program.

District of Columbia

[2025 DC B 525](#): Amends the DC Nurse Education Enhancement Program Act to allow the University of the District of Columbia to provide nursing students pursuing a Licensed Practical Nurse to Associate in Applied Science in Nursing degree through its Community College with a monthly stipend for living expenses and transportation.

Florida

[2024 FL H 914](#): Relates to career and technical education, requires the Office of Reimagining Education and Career Help, in coordination with specified entities, to publish and disseminate specified career and technical education information and specified needs for the state's health care workforce; provides an exemption for a minor to work in specified conditions.

Iowa

[2023 IA S 219](#): Removed the educational requirement for an applicant to perform tattooing. Previously, an applicant was required to show proof of a high school diploma, high school equivalency diploma, or degree from an accredited college as a condition for receiving a permit.

Kansas

[2023 KS H 2239](#)⁶⁷: Allows exemptions from continuing education requirements for all professional licenses if the licensee's license is current, valid, and the applicant self-certifies to performing not less than 1,000 hours in the occupation during each licensure period.

Kentucky

[2023 KY H 32](#): Allows a school district to hire classified personnel without a high school diploma or equivalent if the district provides the employee the opportunity to obtain a high school equivalency diploma at no cost to the employee.

⁶⁷ KS H 2239 was introduced but not enacted.

[2024 KY S 164](#): Relates to building trade professions, provides that the Department of Housing, Buildings, and Construction shall recognize and honor articulation agreements executed between licensed proprietary schools and public school districts or State Area Technology Centers to allow for academic or training equivalencies needed to obtain licensure in a profession regulated by the department, including but not limited to electrician, plumbing, and heating, ventilation, and air conditioning licenses.

[2024 KY H 387](#): Provides that the Education Professional Standards Board shall issue a one-year emergency certificate for substitute teaching to any applicant who possesses a minimum of a high school diploma or equivalent and has met specified requirements to receive the certificate, provides that the Kentucky Department of Education may agree with any building and construction trade organization to develop a training program for school counselors providing services to students.

Maine

[2023 ME H 394](#)⁶⁸: Directs the State Board of Education to adopt rules to amend the credentialing of education personnel to create alternative pathways for teachers to obtain an endorsement on a teaching certificate for a component of industrial arts. Additional pathways include apprenticeships, career and technical education, paid employment or teaching experience, or a minimum number of hours of experience.

Missouri

[2023 MO S 552](#)⁶⁹: Established a “Nursing Education Incentive Program” within the state board of nursing, funded by a surcharge on licensing fees, that would award grants to eligible institutions of higher education based on criteria jointly determined by the board and the department of higher education and workforce development.

New Hampshire

[2024 NH H 1385](#): Establishes the Veteran Licensing Acceleration Program for occupational licensure, establishes a program to provide accelerated licensing and certification processes for veterans seeking to enter licensed occupational professions overseen by boards, provides that the VLAP administrator shall, among other things, provide veterans with comprehensive resources and support.

New Jersey

[2022 NJ A 5480](#)⁷⁰: Modified age and education requirements to qualify as a radiologic technologist. Reduced the age from 18 to 16 and added an option for an applicant to seek licensure if the applicant is enrolled in a four-year course of study in a secondary school approved by the State Board of Education or an alternative education program, which either will lead to a high school diploma or equivalent.

⁶⁸ ME H 394 was introduced but not enacted.

⁶⁹ MO S 552 was introduced but not enacted.

⁷⁰ NJ A 5480 was introduced but not enacted.

Oklahoma

[2023 OK S 370](#)⁷¹: Provided that certain experience is a substitute for a degree for a nursing facility administrator license.

Rhode Island

[2024 RI S 2867](#): Enacts the Ladders to Licensure Program; directs the Executive Office of Health and Human Services, in conjunction with the Department of Labor and Training and the Office of the Postsecondary Commissioner, to implement a grant program to fund public or private partnerships that provide opportunities for healthcare paraprofessionals to pursue higher education degrees and health professional licensure.

West Virginia

[2024 WV H 5347](#): Enacts the Pathway for a Career in Medicine Program, establishes a program for emergency medical technicians to become certified paramedics, and provides funding for the program.

Additionally, the department may consider working with other state agencies, like the Office of Public Instruction, the Office of the Commissioner of Higher Education, and the Montana University System, to seek partnerships to align curricula with licensing needs, develop additional online training programs, expand access to vocational programs, and continue to promote apprenticeships and on-the-job training.

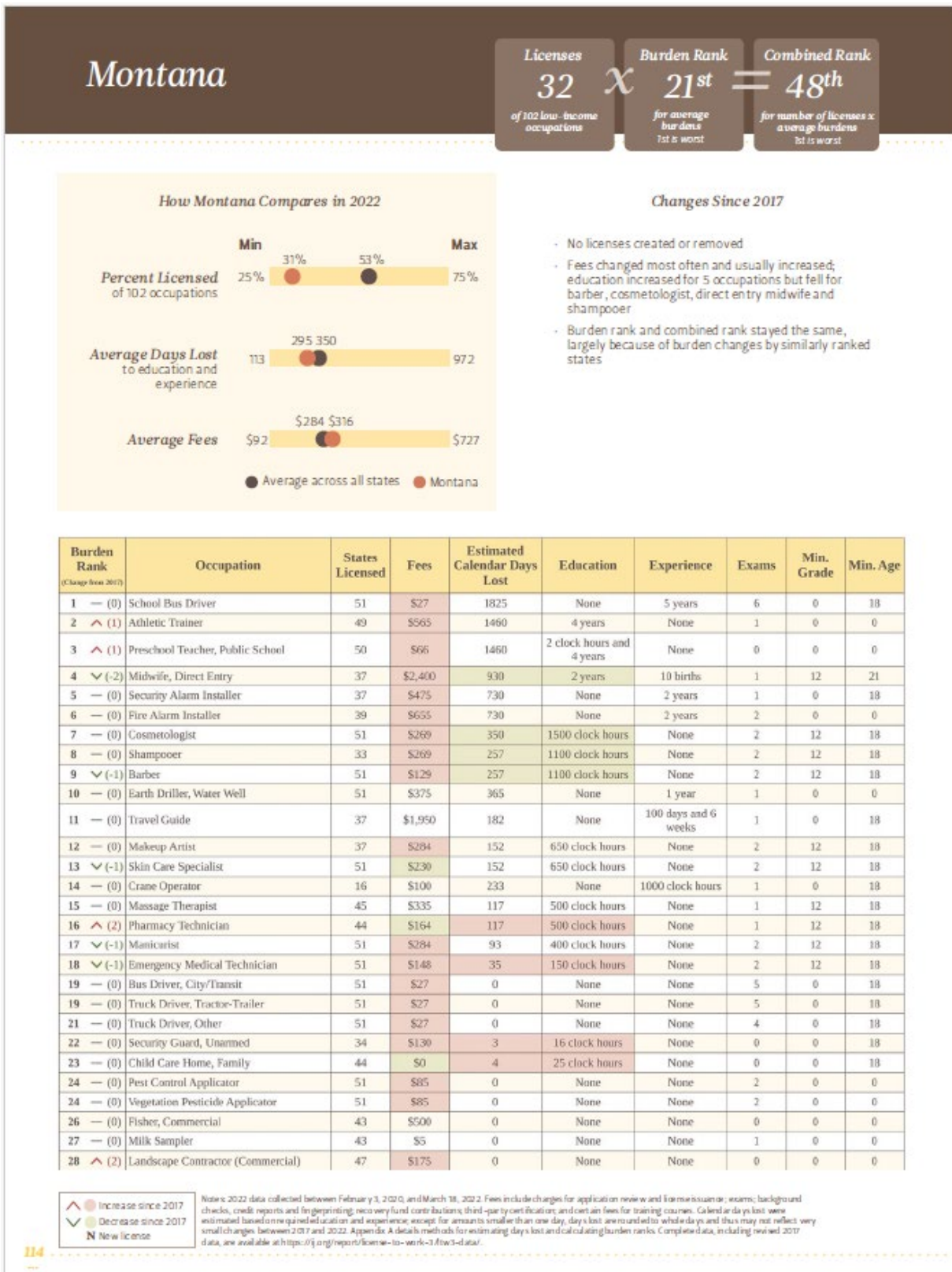
Reevaluating and streamlining education and training requirements helps make entry into licensed professions more accessible. Implementing alternative pathways offers more flexible and cost-effective routes to licensure. Recognizing prior learning and experience helps reduce the time and expense required to obtain a license.

⁷¹ OK S 370 was introduced but not enacted.

Conclusion

Occupational licensing reform has been a focus of many states' labor departments, governors' offices, and even recent presidential administrations. Because regulation and reform are made at the state level, there is no simple, one-size-fits-all, solution to reduce barriers to entry. Montana has succeeded in lowering some barriers by engaging with multiple stakeholders to find solutions that benefit the workforce and Montana citizens. The department should continue to engage with all stakeholders as it works through potential solutions. The Licensing Reform Advisory Council will be a valuable asset in developing strategies and bringing additional perspective to the issue. The department should also engage with other state agencies and national groups like NCSL and CSG for additional ideas and best practices on reducing barriers to entry.

Appendix A: Institute for Justice – License to Work (V3). Montana



Burden Rank <small>(Change from 2017)</small>	Occupation	States Licensed	Fees	Estimated Calendar Days Lost	Education	Experience	Exams	Min. Grade	Min. Age
28 ^ (2)	Landscape Contractor (Residential)	48	\$175	0	None	None	0	0	0
30 v (-2)	Gaming Dealer	29	\$105	0	None	None	0	0	0
31 ^ (1)	Coach, Head (High School Sports)	47	\$0	2	14 clock hours	None	0	0	0
32 v (-3)	Taxidermist	28	\$50	0	None	None	0	0	0
—	Averages	—	\$316	295	—	—	1.5	3.8	10.8

Appendix B: Institute for Justice State-by-State Comparison:

For each occupation listed below, Montana is compared to its neighboring states, along with the least burdensome states in the country. A higher ranking indicates more barriers to entry. For example, for athletic trainers, Montana appears to be in the middle of the pack for the country, ranking 28th in the country. Washington is the most burdensome state, while Utah appears to be the least burdensome state in the country.

Athletic trainers

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
-	California	0					
1	Washington	1	\$505	1461	1	0	0
4	Wyoming	1	\$605	1460	2	0	18
11	Oregon	1	\$615	1460	1	0	18
13	Nevada	1	\$730	1460	1	0	0
20	Nebraska	1	\$419	1460	1	0	19
28	Montana	1	\$565	1460	1	0	0
32	Colorado	1	\$540	1460	1	0	0
32	Idaho	1	\$540	1460	1	0	0
39	North Dakota	1	\$490	1460	1	0	0
39	South Dakota	1	\$490	1460	1	0	0
46	Utah	1	\$460	1460	1	0	0

Barbers

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
1	Nevada	1	\$165	896	4	0	18
5	Nebraska	1	\$200	420	2	12	17
9	North Dakota	1	\$100	362	2	12	18
21	South Dakota	1	\$150	350	2	0	18
22	Colorado	1	\$152	350	2	0	16
32	Montana	1	\$129	257	2	12	18
35	Wyoming	1	\$200	233	2	10	17
39	California	1	\$125	233	1	10	17
40	Idaho	1	\$60	210	3	10	16.5
44	Washington	1	\$25	233	2	0	17
47	Utah	1	\$230	233	1	0	0
49	Oregon	1	\$120	181	3	0	0
50	Florida	1	\$174	140	1	0	16
51	New York	1	\$75	68	2	0	17

Cosmetologists

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
4	Nebraska	1	\$78 420		1	12	17
6	Nevada	1	\$195 373		3	10	18
8	Wyoming	1	\$148 373		2	10	16
9	Idaho	1	\$109 373		2	10	16.5
10	Washington	1	\$319 373		2	0	17
12	Utah	1	\$234 373		2	0	0
14	Montana	1	\$269 350		2	12	18
25	North Dakota	1	\$145 350		3	12	0
35	Colorado	1	\$177 350		2	0	16
36	South Dakota	1	\$100 350		2	0	18
46	Oregon	1	\$90 266		3	0	0
48	Texas	1	\$172 233		2	12	17
49	California	1	\$125 233		1	10	17
50	New York	1	\$70 233		2	0	17

Crane Operator

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
-	Colorado	0					
-	Idaho	0					
-	North Dakota	0					
-	Nebraska	0					
-	Oregon	0					
-	South Dakota	0					
-	Wyoming	0					
5	Montana	1	\$100 233		1	0	18
8	Washington	1	\$240 4		3	0	18
10	California	1	\$240 0		2	0	18
10	Nevada	1	\$240 0		2	0	18
10	Utah	1	\$240 0		2	0	18
14	Massachusetts	1	\$75 0		1	0	18
14	Rhode Island	1	\$75 0		1	0	18

Direct Entry Midwife

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
-	North Dakota	0					
-	Nebraska	0					
-	Nevada	0					
4	Washington	1	\$1996	1095	3	12	21
5	Oregon	1	\$1950	1095	2	12	0
9	California	1	\$1449	1095	1	0	0
10	Montana	1	\$2400	930	1	12	21
11	Colorado	1	\$1600	830	1	12	19
23	Wyoming	1	\$2500	730	1	12	0
26	South Dakota	1	\$2343	730	1	12	0
27	Idaho	1	\$2300	730	1	12	0
33	Utah	1	\$1400	730	1	12	0
37	New Jersey	1	\$1610	730	1	0	18

Emergency Medical Technician

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
8	California	1	\$147	40	2	0	18
16	Montana	1	\$148	35	2	12	18
18	Nevada	1	\$98	35	2	12	18
18	Washington	1	\$98	35	2	12	18
20	Oregon	1	\$253	35	2	0	18
27	Colorado	1	\$150	35	2	0	18
29	Nebraska	1	\$143	35	2	0	18
31	Wyoming	1	\$137	35	2	0	18
33	South Dakota	1	\$98	35	2	0	18
39	Idaho	1	\$98	35	2	0	16
39	North Dakota	1	\$98	35	2	0	16
47	Utah	1	\$208	28	2	0	18
48	District of Columbia	1	\$143	28	2	0	18
49	New Jersey	1	\$163	26	2	0	18
50	Missouri	1	\$140	26	2	0	18
51	Florida	1	\$133	26	1	0	18

Esthetician

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
9	Washington	1	\$319	175	2	0	17
12	Montana	1	\$230	152	2	12	18
14	Nevada	1	\$195	140	3	10	18
17	Idaho	1	\$214	140	2	10	16.5
22	North Dakota	1	\$165	140	3	12	0
23	Wyoming	1	\$123	140	2	10	16
30	Nebraska	1	\$83	140	1	12	17
32	California	1	\$115	140	1	10	17
34	Colorado	1	\$152	140	2	0	16
35	South Dakota	1	\$100	140	2	0	18
38	Utah	1	\$234	140	2	0	0
47	Oregon	1	\$90	110	3	0	0
48	Michigan	1	\$230	93	2	9	17
50	Pennsylvania	1	\$103	70	1	10	16
51	Florida	1	\$75	51	0	0	16

Manicurist

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
2	Nevada	1	\$195	140	3	10	18
7	Washington	1	\$319	140	2	0	17
9	Colorado	1	\$169	140	2	0	16
15	Montana	1	\$284	93	2	12	18
16	Idaho	1	\$214	93	2	10	16.5
19	Wyoming	1	\$148	93	2	10	16
21	California	1	\$110	93	1	10	17
22	South Dakota	1	\$100	93	2	0	18
28	North Dakota	1	\$205	82	3	0	0
34	Nebraska	1	\$83	70	2	12	17
38	Utah	1	\$232	70	2	0	0
41	Oregon	1	\$90	63	3	0	0
47	Florida	1	\$75	42	0	0	16

Massage Therapist

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
-	California	0					
-	Wyoming	0					
3	Nebraska	1	\$305 233		1	0	19
5	North Dakota	1	\$345 175		1	12	18
12	Washington	1	\$421 146		2	0	18
14	Oregon	1	\$336 146		2	0	18
20	Nevada	1	\$675 128		1	0	18
21	Utah	1	\$255 140		1	0	18
25	South Dakota	1	\$360 117		1	12	18
28	Montana	1	\$335 117		1	12	18
30	Idaho	1	\$310 117		1	12	18
41	Colorado	1	\$395 117		1	0	0
44	Maine	1	\$256 0		1	12	18

Pharmacy Technician

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
-	Colorado	0					
1	Nevada	1	\$100 222		0	12	18
6	Utah	1	\$212 140		1	12	0
7	Washington	1	\$187 140		1	12	0
8	North Dakota	1	\$162 140		1	12	0
11	Oregon	1	\$288 117		1	12	18
12	Wyoming	1	\$229 117		1	12	18
13	Idaho	1	\$192 117		1	12	18
16	Montana	1	\$164 117		1	12	18
17	Nebraska	1	\$154 117		1	12	18
23	South Dakota	1	\$154 117		1	12	0
26	California	1	\$249 56		0	12	0

Security Guard

Burden Rank	State	Licensed	Fees	Estimated Calendar Days Lost	Exams	Min. Grade	Min. Age
-	Colorado	0					
-	Idaho	0					
-	Nebraska	0					
-	South Dakota	0					
-	Wyoming	0					
1	North Dakota	1	\$91 243		0	12	18
5	Oregon	1	\$106 2		1	12	18
14	Washington	1	\$99 3		1	0	18
16	California	1	\$104 1		1	0	18
20	Montana	1	\$130 3		0	0	18
22	Nevada	1	\$85 0		1	0	18
27	Utah	1	\$90 1		1	0	0

Appendix C: DLI & Licensing Board Regulated Occupations

The following tables list the various occupational licenses and endorsements available through the Department of Labor or an administratively attached licensing board. The information in the tables is identical; the first table displays the occupations alphabetically and the second table groups the occupations by regulating entity or program.

Occupation	Regulating Entity
Acupuncture	Alternative Health Care Board
Advanced Emergency Medical Technician	DLI Emergency Care Providers Program ⁷²
Advanced Practice Registered Nurse	Board of Nursing
Agricultural Boiler Engineer	DLI Boiler Operator Program
Architect	Board of Architects & Landscape Architects
Assistant Behavioral Analyst	Board of Psychologists
Athletic Trainer	Board of Physical, Rehabilitative & Developmental Professionals ⁷³
Audiology Assistant	Board of Physical, Rehabilitative & Developmental Professionals ⁷⁴
Audiologist	Board of Physical, Rehabilitative & Developmental Professionals
Barber	Board of Barbers & Cosmetologists
Barber (Nonchemical)	Board of Barbers & Cosmetologists
Behavioral Analyst	Board of Psychologists
Booth Rental – Barbers & Cosmetologists	Board of Barbers & Cosmetologists
Certified Behavioral Health Peer Support Specialist	Board of Behavioral Health
Certified Family Peer Support Specialist ⁷⁵	Board of Behavioral Health
Certified Euthanasia Agency	Board of Veterinary Medicine
Cemetery – Private For-Profit	Board of Funeral Service
Certified General Appraiser	Board of Real Estate Appraisers
Certified Residential Appraiser	Board of Real Estate Appraisers
Certified Public Accountant	Board of Public Accountants
Chiropractor	Board of Chiropractors
Clinical Lab Scientist	Allied Health Care Board ⁷⁶
Clinical Lab Specialist	Allied Health Care Board
Clinical Lab Technician	Allied Health Care Board
Clinical Pharmacist Practitioner	Board of Pharmacy
Construction Blaster	DLI Construction Blaster Program
Construction Contractor ⁷⁷	DLI Construction Contractor Program
Cosmetologist	Board of Barbers & Cosmetologists

⁷² Emergency Care Providers (ECP) were previously under the authority of the Board of Medical Examiners. SB518 (2025) transferred the licensing and oversight of ECPs to a department program.

⁷³ HB438 (2025) consolidated the Board of Athletic Trainers with three other boards to establish this new board.

⁷⁴ HB438 (2025) consolidated the Board of Speech-Language Pathologists and Audiologists with three other boards to establish this new board.

⁷⁵ New license type in 2025. HB76 (2025).

⁷⁶ HB502 (2025) consolidated the Board of Clinical Laboratory Science Practitioners with two other boards to establish this new board.

⁷⁷ HB239 (2025) converted Construction Contractor registration to an occupational license, effective 1/1/26.

Occupation	Regulating Entity
Crane/Hoisting Operator	DLI Crane/Hoisting Operator Program
Crematorium	Board of Funeral Services
Crematory Operator	Board of Funeral Services
Crematory Technician	Board of Funeral Services
Dangerous Drug Researcher	Board of Pharmacy
Dental Hygienist	Board of Dentistry
Dentist	Board of Dentistry
Denturist	Board of Dentistry
Dietitian ⁷⁸	Board of Medical Examiners
Direct Entry Midwife	Alternative Health Care Board
Direct Entry Midwife Apprentice	Alternative Health Care Board
Doula ⁷⁹	DLI Doula Program
Electrical Contractor	State Electrical Board
Electrologist	Board of Barbers & Cosmetology
Electronic Security Firm	DLI Private Security Program
Elevator Contractor	DLI Elevator Contractors, Mechanics, and Inspectors Licensing Program
Elevator Mechanic	DLI Elevator Contractors, Mechanics, and Inspectors Licensing Program
Elevator Inspector	DLI Elevator Contractors, Mechanics, and Inspectors Licensing Program
Embryo Transfer Technician	Board of Veterinary Medicine
Emergency Medical Responder	DLI Emergency Care Providers Program
Emergency Medical Technician	DLI Emergency Care Providers Program
Engineer Intern	Board of Professional Engineers and Professional Land Surveyors
Esthetician	Board of Barbers & Cosmetology
Euthanasia Technician	Board of Veterinary Medicine
Firearm Endorsement	DLI Private Security Program
Fire Protection – Business Entity (Sell, Install, and Service)	DLI Fire Protection License Program
Fire Protection – Individual Endorsement (Sell, Install, and Service)	DLI Fire Protection License Program
Fireworks Wholesaler	DLI Fire Protection License Program
First Class Boiler Engineer	DLI Boiler Operator Program
Genetic Counselor	DLI Genetic Counselor Program
Guide	Board of Outfitters
Hearing Aid Dispenser	DLI Hearing Aid Dispenser Program
Hearing Aid Dispenser Trainee	DLI Hearing Aid Dispenser Program
Home Inspector ⁸⁰	DLI Home Inspector Program
Impairment Evaluator	Board of Chiropractors
Instructor – Barbers & Cosmetologists	Board of Barbers & Cosmetologists

⁷⁸ New license type in 2025. HB806 (2025)

⁷⁹ New license type in 2025; effective 1/1/27. SB319 (2025)

⁸⁰ HB225 (2025) converted Home Inspector registrations to an occupational license, effective 1/1/26.

Occupation	Regulating Entity
Journeyman Electrician	State Electrical Board
Journeyman Plumber	Board of Plumbers
Land Surveyor Intern	Board of Professional Engineers & Professional Land Surveyors
Landscape Architect	Board of Architects & Landscape Architects
Licensed Addiction Counselor	Board of Behavioral Health
Licensed Addiction Counselor Candidate	Board of Behavioral Health
License Appraiser	Board of Real Estate Appraisers
Licensed Baccalaureate Social Worker	Board of Behavioral Health
Licensed Baccalaureate Social Worker Candidate	Board of Behavioral Health
Licensed Clinical Social Worker	Board of Behavioral Health
Licensed Clinical Social Worker Candidate	Board of Behavioral Health
Licensed Clinical Professional Counselor	Board of Behavioral Health
Licensed Clinical Professional Counselor Candidate	Board of Behavioral Health
Licensed Marriage & Family Therapist	Board of Behavioral Health
Licensed Marriage & Family Therapist Candidate	Board of Behavioral Health
Licensed Massage Therapist	Board of Massage Therapy
Licensed Master's Social Worker (non-clinical)	Board of Behavioral Health
Licensed Master's Social Worker Candidate (non-clinical)	Board of Behavioral Health
Licensed Practical Nurse (LPN)	Board of Nursing
Limited Low Pressure Boiler Engineer	DLI Boiler Operator Program
Limited Permit X-Ray Technician	Allied Health Care Board ⁸¹
Limited-Service Pharmacy	Board of Pharmacy
Limited Speech-Language Pathologist	Board of Physical, Rehabilitative & Developmental Professionals
Low Pressure Boiler Engineer	DLI Boiler Operator Program
Mail Order Pharmacy	Board of Pharmacy
Manicurist	Board of Barbers & Cosmetologists
Master Electrician	State Electrical Board
Master Plumber	Board of Plumbers
Medical Gas Plumber Endorsement	Board of Plumbers
Medical Practitioner Dispenser	Board of Pharmacy
Medication Aide I	Board of Nursing
Medication Aide II	Board of Nursing
Mentor Endorsement for Licensed Appraisers	Board of Real Estate Appraisers
Mortician	Board of Funeral Service
Mortician Intern	Board of Funeral Service
Mortuary	Board of Funeral Service
Mortuary Branch	Board of Funeral Service
Naturopathic Physician	Alternative Health Care Board
Nursing Home Administrator	Board of Nursing Home Administrators
Nutritionist	Board of Medical Examiners

⁸¹ HB502 (2025) consolidated the Board of Radiologic Technologists with two other boards to establish this new board.

Occupation	Regulating Entity
Occupational Therapist ⁸²	Board of Physical, Rehabilitative & Developmental Professionals
Occupational Therapy Assistant	Board of Physical, Rehabilitative & Developmental Professionals
Optometrist	Board of Optometry
Outfitter	Board of Outfitters
Outpatient Surgical Center	Board of Pharmacy
Paramedic	DLI Emergency Care Provider Program
Pediatric Complex Care Assistant	DLI Pediatric Complex Care Assistant Program
Pharmacist	Board of Pharmacy
Pharmacy Community – Certified	Board of Pharmacy
Pharmacy Institutional – Certified	Board of Pharmacy
Pharmacy Technician	Board of Pharmacy
Physical Therapist ⁸³	Board of Physical, Rehabilitative & Developmental Professionals
Physical Therapy Assistant	Board of Physical, Rehabilitative & Developmental Professionals
Physician	Board of Medical Examiners
Physician Assistant	Board of Medical Examiners
Podiatrist	Board of Medical Examiners
Preceptor License	Board of Pharmacy
Private Investigator	DLI Private Security Program
Private Investigator Trainee	DLI Private Security Program
Private Security Firearms Instructor	DLI Private Security Program
Private Security Firm	DLI Private Security Program
Private Security Guard	DLI Private Security Program
Professional Engineer	Board of Professional Engineers & Professional Land Surveyors
Professional Land Surveyor	Board of Professional Engineers & Professional Land Surveyors
Property Manager	DLI Property Management Program
Process Server	DLI Private Security Program
Psychologist	Board of Psychologists
Radiologic Technologist	Allied Health Care Board
Real Estate Broker	Board of Realty Regulation
Real Estate Salesperson	Board of Realty Regulation
Registered Intern Pharmacist	Board of Pharmacy
Registered Nurse (RN)	Board of Nursing
Resident Physician	Board of Medical Examiners
Residential Electrician	State Electrical Board
Respiratory Care Practitioner ⁸⁴	Allied Health Care Board

⁸² HB438 (2025) consolidated the Board of Occupational Therapy Practice with three other boards to establish this new board.

⁸³ HB438 (2025) consolidated the Board of Physical Therapy Examiners with three other boards to establish this new board.

⁸⁴ HB502 (2025) consolidated the Board of Respiratory Care Practitioners with two other boards to establish this new board.

Occupation	Regulating Entity
Salon/Shop – Barbers & Cosmetologists	Board of Barbers & Cosmetologists
Sanitarian	DLI Sanitarian Program
Sanitarian-in-Training	DLI Sanitarian Program
School or Course – Barbers & Cosmetologists	Board of Barbers & Cosmetologists
Second Class Boiler Engineer	DLI Boiler Operator Program
Security Alarm Installer	DLI Private Security Program
Speech-Language Pathologist	Board of Physical, Rehabilitative & Developmental Professionals
Speech-Language Pathologists-Audiologist	Board of Physical, Rehabilitative & Developmental Professionals
Speech-Language Pathology Assistant	Board of Physical, Rehabilitative & Developmental Professionals
Supervising Broker Endorsement	Board of Realty Regulation
Third Class Boiler Engineer	DLI Boiler Operator Program
Traction Engineer	DLI Boiler Operator Program
Trainee License for Real Estate Appraisers	Board of Real Estate Appraisers
Veterinarian	Board of Veterinary Medicine
Veterinary Technician	Board of Veterinary Medicine
Wholesale Drug Distributor	Board of Pharmacy

Regulating Entity	Occupation
Licensing Boards	
Allied Health Care Board	Clinical Lab Scientist Clinical Lab Specialist Clinical Lab Technician Limited Permit X-Ray Technician Radiologic Technician Respiratory Care Practitioner
Alternative Health Care Board	Acupuncture Direct Entry Midwife Direct Entry Midwife Apprentice Naturopathic Physician
Board of Architects & Landscape Architects	Architect Landscape Architect
Board of Barbers & Cosmetologists	Barber Barber (Nonchemical) Booth Rental – Barbers & Cosmetologists Cosmetologist Electrologist Esthetician Instructor – Barbers & Cosmetologists Manicurist Salon/Shop – Barbers & Cosmetologists School or Course – Barbers & Cosmetologists
Board of Behavioral Health	Certified Behavioral Health Peer Support Specialist

Regulating Entity	Occupation
	Certified Family Peer Support Specialist Licensed Addiction Counselor Licensed Addiction Counselor Candidate Licensed Baccalaureate Social Worker Licensed Baccalaureate Social Worker Candidate Licensed Clinical Professional Counselor Licensed Professional Counselor Candidate Licensed Clinical Social Worker Licensed Clinical Social Worker Candidate Licensed Marriage & Family Therapist Licensed Marriage & Family Therapist Candidate Licensed Master's Social Worker (non-clinical) Licensed Master's Social Worker Candidate (non-clinical)
Board of Chiropractors	Chiropractor Impairment Evaluator
Board of Dentistry	Dental Hygienist Dentist Denturist
Board of Funeral Service	Cemetery – Private For-Profit Crematorium Crematory Operator Crematory Technician Mortician Mortician Intern Mortuary Mortuary Branch
Board of Massage Therapy	Licensed Massage Therapist
Board of Medical Examiners	Dietitian Nutritionist Physician Physician Assistant Podiatrist Resident Physician
Board of Nursing	Advanced Practice Registered Nurse Licensed Practical Nurse (LPN) Medication Aide I Medication Aide II Registered Nurse (RN)
Board of Nursing Home Administrators	Nursing Home Administrator
Board of Optometry	Optometrist
Board of Outfitters	Guide Outfitter
Board of Pharmacy	Clinical Pharmacist Practitioner Dangerous Drug Researcher Limited-Service Pharmacy

Regulating Entity	Occupation
	Mail Order Pharmacy Medical Practitioner Dispenser Outpatient Surgical Center Pharmacist Pharmacy Community – Certified Pharmacy Institutional – Certified Pharmacy Technician Preceptor License Registered Intern Pharmacist Wholesale Drug Distributor
Board of Physical, Rehabilitative & Developmental Professionals	Athletic Trainer Audiology Assistant Audiologist Limited Speech-Language Pathologist Occupational Therapist Occupational Therapy Assistant Physical Therapist Physical Therapy Assistant Speech-Language Pathologist Speech-Language Pathologist-Audiologist Speech-Language Pathology Assistant
Board of Plumbers	Journeyman Plumber Master Plumber Medical Gas Plumber Endorsement
Board of Professional Engineers & Professional Land Surveyors	Engineer Intern Land Surveyor Intern Professional Engineer Professional Land Surveyor
Board of Psychologists	Assistant Behavioral Analyst Behavioral Analyst Psychologist
Board of Public Accountants	Certified Public Accountant
Board of Real Estate Appraisers	Certified General Appraiser Certified Residential Appraiser Licensed Appraiser Mentor Endorsement for Licensed Appraisers Trainee License for Real Estate Appraisers
Board of Realty Regulation	Real Estate Broker Real Estate Salesperson Supervising Broker Endorsement
Board of Veterinary Medicine	Certified Euthanasia Agency Embryo Transfer Technician Euthanasia Technician Veterinarian Veterinary Technician
State Electrical Board	Electrical Contractor

Regulating Entity	Occupation
	Journeyman Electrician Master Electrician Residential Electrician
DLI Programs	
Boiler Operator Program	Agricultural Boiler Engineer First Class Boiler Engineer Limited Low Pressure Boiler Engineer Low Pressure Boiler Engineer Second Class Boiler Engineer Third Class Boiler Engineer Traction Engineer
Construction Blaster Program	Construction Blaster
Construction Contractor Program	Construction Contractor
Crane/Hoisting Operator Program	Crane/Hoisting Operator
Doula Program	Doula
Elevator Contractors, Mechanics, & Inspectors Licensing Program	Elevator Contractor Elevator Mechanic Elevator Inspector
Emergency Care Providers Program	Advanced Emergency Medical Technician Emergency Medical Responder Emergency Medical Technician Paramedic
Fire Protection License Program	Fire Protection – Business Entity (Sell, Install, and Service) Fire Protection – Individual Endorsement (Sell, Install, and Service) Fireworks Wholesaler
Genetic Counselor Program	Genetic Counselor
Hearing Aid Dispenser Program	Hearing Aid Dispenser Hearing Aid Dispenser Trainee
Home Inspector Program	Home Inspector
Pediatric Complex Care Assistant Program	Pediatric Complex Care Assistant
Private Security Program	Electronic Security Firm Firearm Endorsement Private Investigator Private Investigator Trainee Private Security Firearms Instructor Private Security Firm Private Security Guard Process Server Security Alarm Installer
Property Management Program	Property Manager
Sanitarians Program	Sanitarian Sanitarian-in-Training

Appendix D: Licensing Barrier Comparison – Selected Occupations

Pages 49 through 71 show a comparison of commonly licensed occupations that were not included in the Institute for Justice study. The occupations are compared against the same neighboring states as in Appendix B: California, Colorado, Idaho, Nebraska, Nevada, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.

For each category, the least burdensome state is shown in green, and the most burdensome is shown in red. For example, the lowest licensing fee is shown in green, and the highest licensing fee is shown in red. A state earns a point for every green category and loses a point for every red category.

Only categories where there is a variance are shown. For example, if all states require the same level of education, the requirement is omitted, as it is considered an equal burden across the states. Similarly, if all states offer reciprocity or endorsement, the category is omitted.

Some occupations have unique licensing requirements, such as CPAs requiring a certain number of credit hours in order to sit for exams. In those cases, the requirements are included. If a state does not license the occupation, it is marked with dashes.

States vary with the frequency of license renewals and continuing education requirements. For this reason, all license renewal fees, and continuing education hours have been annualized.

Unlike the Institute for Justice’s study, a higher ranking indicates a lower burden, or less barriers to entry. For example, on the following page, when comparing licensing requirements for acupuncturists, Montana is ranked second on the list, which means it is the *second least burdensome state*. In this comparison, Colorado is the least burdensome state, and Wyoming is the most burdensome state.

Acupuncturists⁸⁵

State	Initial Licensing Fee	Number of Exams	Experience or Training	License Renewal Fee	Reciprocity or Endorsement
California	\$750	1	3000 hours	\$250	No
Colorado	\$186	5	1000 hours	\$18	Endorsement
Idaho	\$200	6	1725 hours	\$75	Endorsement
Montana	\$125	4	1000 hours	\$50	Endorsement
Nebraska	\$300	4	1725 hours	\$60	No
Nevada	-	-	-	-	-
North Dakota	\$350	5	2625 hours	\$100	Endorsement
Oregon	\$615	6	1905 hours	\$203	Endorsement
South Dakota	-	-	-	-	-
Utah	\$110	5	1905 hours	\$30	Endorsement
Washington	\$69	5	1707 hours	\$69	Endorsement
Wyoming	\$1100	5	1850 hours	\$450	Endorsement

Acupuncture Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	3
T2	Montana	2
T2	Washington	2
T3	North Dakota	1
T3	Utah	1
T4	Idaho	0
T4	Oregon	0
T5	California	-1
T5	Nebraska	-1
6	Wyoming	-2
-	Nevada	N/A
-	South Dakota	N/A

For acupuncture, Colorado appears to be the least burdensome state among Montana's neighboring states, with low fees, minimal experience needed relative to other states, and the ability to obtain licensure by endorsement. Montana ranks second, along with Washington, due to the experience and endorsement categories.

⁸⁵ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Acupuncturists, Accessed 9/11/2024; 5/1/2025.

Audiologist⁸⁶

State	Initial Licensing Fee	Degree	Number of Exams	Experience or Training	License Renewal Fee	Reciprocity or Endorsement
California	\$150	Doctorate	1	300 hours	\$75	Reciprocity
Colorado	\$95	Doctorate	0	None	\$37	Endorsement
Idaho	\$95	Masters	1	Supervised practicum	\$80	Endorsement
Montana	\$150	Doctorate	2	None	\$80	No
Nebraska	\$140	Doctorate	1	36 weeks	\$70	Endorsement
Nevada	\$250	Doctorate	0	None	\$100	Endorsement
North Dakota	\$350	Doctorate	1	None	\$750	Reciprocity
Oregon	\$345	Doctorate	1	1,820 hours	\$125	No
South Dakota	\$200	Masters	1	Supervised practicum	\$200	Endorsement
Utah	\$70	Doctorate	1	1 year	\$24	Endorsement
Washington	\$175	Masters	2	1,080 hours	\$45	Endorsement
Wyoming	\$300	Doctorate	1	ASHA or ABA certification	\$100	Endorsement

Audiologist Licensing Burden Rank

Burden Rank	State	Score
T1	Colorado	3
T1	Nevada	3
T2	Idaho	2
T2	Utah	2
T3	California	1
T3	Nebraska	1
T3	North Dakota	1
T3	South Dakota	1
T3	Washington	1
T3	Wyoming	1
T4	Montana	-1
T4	Oregon	-1

For audiology, Colorado and Nevada appear to be the least burdensome states among Montana's neighbors, as those states do not require exams or experience prior to licensing, and both states offer licensing by endorsement. Montana ties with Oregon as the most burdensome states in the region, as Montana requires 2 exams for an audiology license, and does not offer reciprocity or endorsement.

⁸⁶ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Audiologists, Accessed 9/11/2024; 5/1/2025.

Chiropractor⁸⁷

State	Initial Licensing Fee	Number of Exams	Good Moral Character?	Continuing Education	License Renewal Fee
California	\$482	1	Yes	24 hours	\$336
Colorado	\$370	1	No	15 hours	\$77
Idaho	\$400	1	No	18 hours	\$200
Montana	\$300	2	Yes	12 hours	\$200
Nebraska	\$144	1	No	18 hours	\$177
Nevada	\$550	2	Yes	18 hours	\$350
North Dakota	\$300	2	No	20 hours	\$400
Oregon	\$346	1	Yes	20 hours	\$512
South Dakota	\$300	1	Yes	20 hours	\$100
Utah	\$200	2	Yes	20 hours	\$51
Washington	\$741	2	Yes	25 hours	\$550
Wyoming	\$600	2	No	12 hours	\$300

Chiropractor Licensing Burden Rank

Burden Rank	State	Score
1	Nebraska	2
T2	Colorado	1
T2	Idaho	1
T2	Wyoming	1
3	North Dakota	0
T4	California	-1
T4	Montana	-1
T4	Oregon	-1
T4	South Dakota	-1
T5	Nevada	-2
T5	Utah	-2
6	Washington	-5

For chiropractors, Nebraska appears to be the least burdensome state among Montana's neighboring states, with low fees, only one exam required, and no good moral character requirement. Montana ranks near the bottom of the list, meaning it is one of the more burdensome states, due to the requirement of two exams, the good moral character requirement, and higher licensing fees.

⁸⁷ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Chiropractors, Accessed 9/11/2024; 5/1/2025.

Certified Public Accountant⁸⁸

State	Initial Licensing Fee	Credit Hours to Sit for Exam	Number of Exams	Experience or Training	License Renewal Fee	Good Moral Character Requirement
California	\$1583	120	5	2000 hours	\$140	No
Colorado	\$1263	120	5	1800 hours	\$28	No
Idaho	\$1173	120	5	2000 hours	\$120	Yes
Montana	\$1348	120	5	2000 hours	\$125	Yes
Nebraska	\$1338	150	5	4000 hours	\$5	No
Nevada	\$1293	120	5	4000 hours	\$120	Yes
North Dakota	\$1073	120	5	2000 hours	\$85	Yes
Oregon	\$1353	150	5	2000 hours	\$128	No
South Dakota	\$1123	150	5	2000 hours	\$50	Yes
Utah	\$1183	120	6	2000 hours	\$32	No
Washington	\$1453	120	5	2000 hours	\$77	Yes
Wyoming	\$1240	150	5	2000 hours	\$190	No

CPA Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	2
T2	California	0
T2	Nebraska	0
T2	North Dakota	0
T2	Oregon	0
T2	Utah	0
T3	Idaho	-1
T3	Montana	-1
T3	Washington	-1
T3	Wyoming	-1
T4	Nevada	-2
T4	South Dakota	-2

For certified public accountants, Colorado appears to be the least burdensome state, with the least amount of experience required, lower fees, and no good moral character requirement. Montana's licensing barriers are similar to many of its neighboring states – only receiving one negative score for the good moral character requirement.

⁸⁸ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Certified public accountant, Accessed 5/1/2025; 5/2/2025.

Dental Hygienist⁸⁹

State	Initial Licensing Fee	Number of Exams	Good Moral Character	Continuing Education	License Renewal Fee
California	\$200	3	No	12.5 hours	\$150
Colorado	\$146	2	No	15 hours	\$63
Idaho	\$325	4	Yes	12 hours	\$88
Montana	\$185	3	Yes	12 hours	\$100
Nebraska	\$110	3	No	15 hours	\$55
Nevada	\$600	3	Yes	15 hours	\$150
North Dakota	\$220	3	No	8 hours	\$83
Oregon	\$210	3	No	12 hours	\$128
South Dakota	\$215	3	Yes	15 hours	\$115
Utah	\$60	2	Yes	15 hours	\$24
Washington	\$100	3	Yes	15 hours	\$70
Wyoming	\$150	3	Yes	8 hours	\$88

Dental Hygienist Licensing Burden Rank

Burden Rank	State	Score
1	North Dakota	2
T2	Colorado	1
T2	Oregon	1
T2	Utah	1
T3	California	0
T3	Nebraska	0
T3	Wyoming	0
4	Montana	-1
T5	Idaho	-2
T5	South Dakota	-2
T5	Washington	-2
6	Nevada	-4

For dental hygienists, North Dakota appears to be the least burdensome for licensing requirements among Montana's neighboring states. North Dakota has average fees and exams, but the lowest CE requirement, and no good moral character requirement. Interestingly, Utah has the lowest initial licensing and renewal fees, and the lowest number of exams, but it's score is reduced because it also has the highest CE requirement and requires a good moral character reference.

Montana ranks toward the bottom of the pack for licensing burden on dental hygienists. Although Montana has relatively low fees and CE requirements, it requires 3 exams and a good moral character reference.

⁸⁹ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Dental hygienists, Accessed 5/2/2025.

Dentist⁹⁰

State	Initial Licensing Fee	Number of Exams	Good Moral Character	Citizenship	Continuing Education	License Renewal Fee
California	\$400	3	Yes	Yes	25 hours	\$325
Colorado	\$328	2	Yes	No	15 hours	\$164
Idaho	\$675	3	Yes	No	15 hours	\$200
Montana	\$185	3	Yes	No	20 hours	\$230
Nebraska	\$165	3	Yes	Yes	15 hours	\$83
Nevada	\$1200	3	Yes	Yes	20 hours	\$300
North Dakota	\$515	3	Yes	No	16 hours	\$220
Oregon	\$445	3	No	No	20 hours	\$220
South Dakota	\$500	3	Yes	Yes	20 hours	\$110
Utah	\$110	2	Yes	Yes	15 hours	\$37 - \$76
Washington	\$500	3	No	Yes	21 hours	\$415
Wyoming	\$300	3	Yes	Yes	8 hours	\$175

Dentist Licensing Burden Rank

Burden Rank	State	Score
1	Oregon	2
2	Utah	1
T3	Idaho	0
T3	Montana	0
T3	North Dakota	0
T4	Colorado	-1
T4	Washington	-1
T4	Wyoming	-1
T5	Nebraska	-2
T5	South Dakota	-2
T6	California	-3
T6	Nevada	-3

For dentists, Oregon appears to be the least burdensome state, with average fees and CE, but no citizenship or good moral character requirement. Montana is also a low burden state for dentists in the western part of the country, thanks to its low fees and average CE requirements. The only negative score for Montana is the good moral character requirement, with three professional and character references required for licensure.

⁹⁰ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Dentists, Accessed 5/2/2025.

Family & Marriage Therapist⁹¹

State	Initial Licensing Fee	Number of Exams	Experience or Training	Continuing Education	License Renewal Fee
California	\$330	2	3000 hours	18 hours	\$150
Colorado	\$70	2	2000 hours	20 hours	Not available
Idaho	\$150	1	3000 hours	20 hours	\$100
Montana	\$230	1	3000 hours	20 hours	\$175
Nebraska	\$50	1	3000 hours	16 hours	\$25
Nevada	\$210	1	3000 hours	20 hours	\$225
North Dakota	\$450	1	2000 hours	15 hours	\$200
Oregon	\$340	2	2400 hours	20 hours	\$167
South Dakota	\$200	1	1700 hours	20 hours	\$100
Utah	\$120	1	4000 hours	20 hours	\$47
Washington	\$306	1	3000 hours	18 hours	\$196
Wyoming	\$350	1	3000 hours	22 hours	\$63

Family & Marriage Therapist Licensing Burden Rank

Burden Rank	State	Score
1	Nebraska	3
2	South Dakota	2
T3	Idaho	1
T3	Montana	1
T3	North Dakota	1
T3	Washington	1
T4	Nevada	0
T4	Utah	0
T4	Wyoming	0
T5	California	-1
T5	Colorado	-1
T5	Oregon	-1

For family & marriage therapists, Nebraska appears to be the least burdensome state for licensing requirements, due to its low fees and number of exams. Montana ranks as a low burdensome state for this occupation as well, with average fees, experience and CE requirements, and only requiring 1 exam prior to licensure.

⁹¹ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Family & Marriage Therapist, Accessed 5/2/2025.

Hearing Aid Dispenser⁹²

State	Initial Licensing Fee	Degree	Number of Exams	Experience or Training	License Renewal Fee	Reciprocity or Endorsement
California	\$300	High School	2	None	\$280	Temporary
Colorado	\$476	Associates	1	300 hours	N/A	Endorsement
Idaho	\$200	High School	2	None	\$100	Endorsement
Montana	\$800	High School	3	None	\$550	No
Nebraska	\$165	High School	2	None	\$83	Reciprocity
Nevada	\$250	High School	1	12 months	\$100	Endorsement
North Dakota	\$150	High School	2	None	\$150	Endorsement
Oregon	\$125	High School	3	520 hours	\$125	No
South Dakota	\$200	High School	1	None	\$200	Board Approval
Utah	\$150	N/A	3	None	\$52	No
Washington	\$205	Associates	3	None	\$75	No
Wyoming	\$200	High School	2	12 months	\$300	Endorsement

Hearing Aid Dispenser Licensing Burden Rank

Burden Rank	State	Score
1	South Dakota	3
T2	California	2
T2	Idaho	2
T2	Nebraska	2
T2	North Dakota	2
T3	Colorado	1
T3	Nevada	1
T4	Wyoming	0
T4	Utah	0
5	Oregon	-1
6	Washington	-2
7	Montana	-3

For hearing aid dispensers, South Dakota appears to be the least burdensome state for licensing requirements, due to only requiring one exam, no experience necessary, and allowing board approval for out-of-state applicants to get licensed. Montana ranks as the most burdensome state on the list, due to having the highest initial licensing fees and renewal fees, requiring 3 licensing exams, and not allowing reciprocity or endorsement.

⁹² Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Hearing Aid Dispensers, Accessed 5/12/2025.

Journeyman Electrician⁹³

State	Initial Licensing Fee	Number of Exams	Apprenticeship Length	Continuing Education	License Renewal Fee	Reciprocity or Endorsement
California	-	-	-	-	-	-
Colorado	N/A	1	8,288 hours	8 hours	N/A	Reciprocity
Idaho	\$70	1	8,000 hours	8 hours	\$15	Reciprocity
Montana	\$240 - \$250	1	8,000 - 20,000 hours	8 hours	\$100	Reciprocity
Nebraska	\$85 - \$110	1	8,000 hours	6 hours	\$12.50	Reciprocity
Nevada	-	-	-	-	-	-
North Dakota	\$50	1	8,000 hours	8 hours	\$25	Reciprocity
Oregon	\$100	1	8,000 hours	8 hours	\$33	Reciprocity
South Dakota	\$80	1	8,000 hours	8 hours	\$20	Reciprocity
Utah	\$116	3	8,000 - 16,000 hours	8 hours	\$35	Endorsement
Washington	\$90	1	8,000 hours	8 hours	\$24 - \$28	No
Wyoming	\$100	1	8,000 hours	6 hours	\$17	Reciprocity

Journeyman Electrician Licensing Burden Rank

Burden Rank	State	Score
1	Nebraska	2
T2	North Dakota	1
T2	Wyoming	1
T3	Colorado	0
T3	Idaho	0
T3	Oregon	0
T3	South Dakota	0
T4	Utah	-1
T4	Washington	-1
5	Montana	-2
-	California	N/A
-	Nevada	N/A

For Journeyman Electricians, Nebraska appears to be the least burdensome state for licensing requirements, due to low license renewal fees and continuing education requirements. Montana ranks as the most burdensome state because it has the highest initial licensing and renewal fees. Overall, the profession has similar licensing requirements across all the compared states, primarily due to the apprenticeship nature of the license.

⁹³ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Acupuncturists, Accessed 5/1/2025.

Journeyman Plumber⁹⁴

State	Initial Licensing Fee	Number of Exams	Apprenticeship Hours	Continuing Education	License Renewal Fee	Reciprocity or Endorsement
California	-	-	-	-	-	-
Colorado	N/A	1	6,800 hours	None	N/A	Endorsement
Idaho	\$37.50	1	8,000 hours	3 hours	\$2.50	Reciprocity
Montana	\$270	1	7,500 hours	4 hours	\$160	Reciprocity
Nebraska	-	-	-	-	-	-
Nevada	\$125	1	8,000 hours	8 hours	\$40	No
North Dakota	\$100	1	9,500 hours	2 hours	\$75	Reciprocity
Oregon	\$100	1	7,700 hours	8 hours	\$60	Reciprocity
South Dakota	\$205	1	1,900 hours	4 hours	\$105	Reciprocity
Utah	\$116	2	8,000 hours	6 hours	\$35	No
Washington	\$122	1	8,000 hours	8 hours	\$122	Reciprocity
Wyoming	-	-	-	-	-	-

Journeyman Plumber Licensing Burden Rank

Burden Rank	State	Score
1	Idaho	3
T2	Colorado	2
T2	South Dakota	2
T3	North Dakota	0
T3	Oregon	0
T3	Washington	0
4	Montana	-1
T5	Nevada	-2
T5	Utah	-2
-	California	N/A
-	Nebraska	N/A
-	Wyoming	N/A

For Journeyman Plumbers, Idaho appears to be the least burdensome state for licensing requirements, due to low licensing fees and reciprocity agreements. While Montana has lower apprenticeship and continuing education hour requirements, it still ranks toward the bottom due to having the highest initial and renewal licensing fees.

⁹⁴ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Journeyman Plumbers, Accessed 5/12/2025.

Landscape Architect⁹⁵

State	Initial Licensing Fee	Number of Exams	Experience or Training	Good Moral Character	Continuing Education	License Renewal Fee
California	\$435	1	6 years	Yes	N/A	\$200
Colorado	\$199	1	6 years	Yes	No	\$12.50
Idaho	\$200	1	0 – 8 years	Yes	No	\$125
Montana	\$325	1	2 – 8 years	No	No	\$170
Nebraska	\$100	1	1 – 3 years	Yes	12 hours	\$150
Nevada	\$275	2	6 years	Yes	8 hours	\$275
North Dakota	\$150	1	3 – 6 years	Yes	No	\$62.50
Oregon	\$425	1	4 – 8 years	Yes	12 hours	\$325
South Dakota	\$100	2	2 – 8 years	No	15 hours	\$40
Utah	\$120	1	8 years	Yes	8 hours	\$36
Washington	\$918	1	3 – 8 years	Yes	12 hours	\$295
Wyoming	\$0	1	3 years	Yes	12 hours	\$62.50

Landscape Architect Licensing Burden Rank

Burden Rank	State	Score
1	Montana	2
T2	Colorado	1
T2	Wyoming	1
T3	Idaho	0
T3	North Dakota	0
T4	California	-1
T4	Nebraska	-1
T4	Oregon	-1
T4	South Dakota	-1
T5	Nevada	-2
T5	Utah	-2
6	Washington	-3

For Landscape Architects, Montana appears to be the least burdensome state for licensing requirements, due to having no continuing education or good moral character requirement, as well as average licensing fees, and similar experience and examination requirements as its neighboring states. Washington appears to be the most burdensome state in the western United States due to high licensing fees, a good moral character requirement, and more continuing education than neighboring states.

⁹⁵ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Landscape Architects, Accessed 5/12/2025.

Morticians & Funeral Directors⁹⁶

State	Initial Licensing Fee	Degree	Number of Exams	Experience or Training	License Renewal Fee	Good Moral Character
California	\$570	Associates	1	N/A	\$380	No
Colorado	-	-	-	-	-	-
Idaho	\$185	Associates	1	1 year	\$85	Yes
Montana	\$544	Associates	2	1 year	\$435	Yes
Nebraska	\$90	40 semester hours	3	1 year	\$45	Yes
Nevada	\$375	None	2	1 year	\$100	Yes
North Dakota	\$100	1 year	2	1 year	\$100	Yes
Oregon	\$160	Associates	2	Apprenticeship	\$160	No
South Dakota	\$175	Associates	2	1 year	\$125	Yes
Utah	\$160	Associates	2	1 year	\$44	No
Washington	\$135	Associates	2	1 year	\$203	No
Wyoming	\$125	Associates	2	1 year	\$125	No

**California, Nevada, and Washington are licensed as funeral directors; the other states are licensed as morticians.*

Mortician & Funeral Director Licensing Burden Rank

Burden Rank	State	Score
T1	California	2
T1	Utah	2
T2	Nebraska	1
T2	Oregon	1
T2	Washington	1
T2	Wyoming	1
3	Nevada	0
T4	Idaho	-1
T4	Nebraska	-1
T4	North Dakota	-1
T4	South Dakota	-1
5	Montana	-2

For Morticians and Funeral Directors, California and Utah appear to be the least burdensome states for licensing requirements, due to no experience or good moral character requirements, exam requirements, and low renewal fees. Montana ranks last among its neighboring states, due to high renewal fees and a good moral character requirement.

⁹⁶ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Morticians & Funeral Directors, Accessed 5/12/2025.

Nurse Practitioner⁹⁷

State	Initial Licensing Fee	Continuing Education	Independent Practice Authority	License Renewal Fee	Reciprocity or Endorsement
California	\$500	15 hours	No	\$75	No
Colorado	\$126	None	Yes	N/A	Endorsement
Idaho	\$118.25	15 hours	Yes	\$45	Endorsement
Montana	\$105	12 hours	Yes	\$25 - \$63	Endorsement
Nebraska	\$113.25	20 hours	Yes	\$34	Endorsement
Nevada	\$240	23 hours	No	\$150	Endorsement
North Dakota	\$125	6 hours	Yes	\$220	Endorsement
Oregon	\$208	23 hours	Yes	\$53	Endorsement
South Dakota	\$100	None	Yes	\$50	Endorsement
Utah	\$130	15 hours	Yes	\$39	Endorsement
Washington	\$125	15 hours	Yes	\$75	Reciprocity
Wyoming	\$310	30 hours	Yes	\$90	Endorsement

Nurse Practitioner Licensing Burden Rank

Burden Rank	State	Score
1	South Dakota	4
T2	Colorado	3
T2	Montana	3
T3	Idaho	2
T3	Nebraska	2
T3	Oregon	2
T3	Utah	2
T3	Washington	2
T4	North Dakota	1
T4	Wyoming	1
5	Nevada	0
6	California	-3

For Nurse Practitioners, South Dakota appears to be the least burdensome state for licensing requirements, due to low fees, no continuing education requirement, independent practice authority, and endorsement availability for out-of-state applicants. Montana ranks second, along with Colorado due to endorsement availability, low renewal fees, and independent practice authority.

⁹⁷ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Nurse Practitioner, Accessed 5/12/2025.

Occupational Therapist⁹⁸

State	Initial Licensing Fee	Number of Exams	Good Moral Character	Continuing Education	License Renewal Fee
California	\$590	1	No	12 hours	\$110
Colorado	\$595	1	No	12 hours	\$20
Idaho	\$620	1	Yes	10 hours	\$40
Montana	\$730	1	No	10 hours	\$0
Nebraska	\$660	1	Yes	10 hours	\$60
Nevada	\$840	2	Yes	12 hours	\$150
North Dakota	\$740	2	No	10 hours	\$75
Oregon	\$820	2	No	15 hours	\$120
South Dakota	\$590	1	Yes	12 hours	\$50
Utah	\$610	1	No	12 hours	\$24
Washington	\$706	2	Yes	15 hours	\$157
Wyoming	\$765	1	No	12 hours	\$110

*All states require a master's degree and 1000 hours supervised fieldwork.

Occupational Therapist Licensing Burden Rank

Burden Rank	State	Score
1	Montana	3
2	California	2
T3	Colorado	1
T3	North Dakota	1
T3	Utah	1
T3	Wyoming	1
T4	Idaho	0
T4	Nebraska	0
T4	South Dakota	0
5	Oregon	-1
6	Nevada	-3
7	Washington	-4

For Occupational Therapists, Montana appears to be the least burdensome states for licensing requirements, with no good moral character requirement, no license renewal fee, and low continuing education requirements. Washington appears to have many licensing barriers for occupational therapy, such as high renewal fees compared to other states, more licensing exams and continuing education hours, and a good moral character requirement.

⁹⁸ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Occupational Therapist, Accessed 5/12/2025.

Optometrist⁹⁹

State	Initial Licensing Fee	Number of Exams	Good Moral Character	Continuing Education	License Renewal Fee
California	\$275	5	No	20 hours	\$250
Colorado	\$200	4	No	12 hours	\$13
Idaho	\$175	3	No	18 hours	\$75
Montana	\$250	4	Yes	18 hours	\$175
Nebraska	\$166	5	Yes	22 hours	\$73
Nevada	\$825	5	Yes	20 hours	\$375
North Dakota	\$200	4	Yes	20 hours	\$200
Oregon	\$355	5	No	18 hours	\$450
South Dakota	\$475	4	Yes	15 hours	\$300
Utah	\$140	3	Yes	15 hours	\$47
Washington	\$146	5	Yes	25 hours	\$166
Wyoming	\$450	5	Yes	20 hours	\$310

Optometrist Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	3
2	Idaho	2
3	Utah	1
4	California	0
T5	Montana	-1
T5	North Dakota	-1
T5	Oregon	-1
T5	South Dakota	-1
T6	Nebraska	-2
T6	Wyoming	-2
T7	Nevada	-3
T7	Washington	-3

For Optometrists, Colorado appears to be the least burdensome state for licensing requirements, due to low license renewal fees, low continuing ed requirements, and no good moral character requirement. Montana ranks in the middle, with average fees, exam and continuing ed requirements, and does ask for a character reference.

⁹⁹ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Optometrists, Accessed 5/12/2025.

Pharmacist¹⁰⁰

State	Initial Licensing Fee	Number of Exams	Experience or Training	Good Moral Character	Continuing Education	License Renewal Fee
California	\$534	2	1500 hours	Yes	15 hours	\$262
Colorado	\$247	2	1500 hours	No	12 hours	\$124
Idaho	\$140	1	1740 hours	Yes	15 hours	\$130
Montana	\$130	2	1500 hours	Yes	15 hours	\$65
Nebraska	\$178	2	1500 hours	Yes	15 hours	\$89
Nevada	\$250	2	1500 hours	Yes	15 hours	\$100
North Dakota	\$125	2	1500 hours	Yes	15 hours	\$100
Oregon	\$300	2	1440 hours	Yes	15 hours	\$162
South Dakota	\$35	2	2000 hours	Yes	12 hours	\$125
Utah	\$240	2	1740 hours	No	15 hours	\$37
Washington	\$400	2	1500 hours	Yes	15 hours	\$265
Wyoming	\$75	2	1200 hours	Yes	12 hours	\$100

Pharmacist Licensing Burden Rank

Burden Rank	State	Score
T1	Colorado	2
T1	Utah	2
2	Wyoming	1
T3	Idaho	0
T3	South Dakota	0
T4	Montana	-1
T4	Nebraska	-1
T4	Nevada	-1
T4	North Dakota	-1
T4	Oregon	-1
T5	California	-2
T5	Washington	-2

For Pharmacists, Colorado and Utah appear to be the least burdensome states for licensing requirements, due to low renewal fees, continuing education, and being the only states that do not require a good moral character reference. Montana's licensing requirements are comparable to many of the other states, and only received one burdensome mark, for the additional requirement of a good moral character reference.

¹⁰⁰ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Pharmacists, Accessed 5/12/2025.

Physical Therapist¹⁰¹

State	Initial Licensing Fee	Number of Exams	Good Moral Character	License Renewal Fee	Licensure Compact	Direct Access
California	\$1130	2	No	\$150	No	Provisional
Colorado	\$551	1	No	\$26	Yes	Unrestricted
Idaho	\$565	2	Yes	\$25	No	Unrestricted
Montana	\$585	2	Yes	\$60	Yes	Unrestricted
Nebraska	\$683	2	Yes	\$67	Yes	Unrestricted
Nevada	\$810	2	Yes	\$150	No	Unrestricted
North Dakota	\$685	2	Yes	\$100	Yes	Unrestricted
Oregon	\$720	2	Yes	\$115	Yes	Unrestricted
South Dakota	\$605	1	Yes	\$60	No	Unrestricted
Utah	\$585	1	Yes	\$24	Yes	Unrestricted
Washington	\$565	2	Yes	\$100	Yes	Provisional
Wyoming	\$725	2	Yes	\$75	No	Limited

Physical Therapist Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	4
2	Utah	3
T3	Montana	1
T3	Nebraska	1
T3	North Dakota	1
T3	Oregon	1
4	South Dakota	0
T5	Idaho	-1
T5	Washington	-1
6	Nevada	-2
T7	California	-3
T7	Wyoming	-3

For Physical Therapists, Colorado appears to be the least burdensome state for licensing requirements, due to low fees & exam requirements, not requiring a moral character reference, no restrictions or limitations for treatment in its scope of practice and being a member state in the interstate compact. Montana ties with several other states as an average burden as far as barriers to entry for Physical Therapists, with average fees and exam requirements and also requiring a good moral character reference. However, like most of the other states, Montana is a member of the interstate compact and also allows direct access for providers.

¹⁰¹ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center
[Occupation Regulation Database](#): Physical Therapists, Accessed 5/13/2025.

Private Investigator¹⁰²

State	Initial Licensing Fee	Experience or Training	Minimum Age	Good Moral Character	License Renewal Fee	Reciprocity or Endorsement
California	\$725	6000 hours	18	No	\$265	No
Colorado	-	-	-	-	-	-
Idaho	-	-	-	-	-	-
Montana	\$270	6000 hours	21	Yes	\$175	Endorsement
Nebraska	\$50	3000 hours	21	Yes	\$25	No
Nevada	\$750	10000 hours	21	Yes	\$500	No
North Dakota	\$250	2000 hours	18	Yes	\$150	No
Oregon	\$625	1500 hours	18	Yes	\$275	Reciprocity
South Dakota	-	-	-	-	-	-
Utah	\$143	2000 hours	21	Yes	\$65	No
Washington	\$344	N/A	18	No	\$193	Endorsement
Wyoming	-	-	-	-	-	-

Private Investigator Licensing Burden Rank

Burden Rank	State	Score
1	Washington	3
2	Oregon	2
T3	California	0
T3	Montana	0
T3	Nebraska	0
4	North Dakota	-1
5	Utah	-2
6	Nevada	-4
-	Colorado	N/A
-	Idaho	N/A
-	South Dakota	N/A
-	Wyoming	N/A

For Private Investigators, Washington appears to be the least burdensome state for licensing requirements, due to a lower minimum age requirement, not requiring a moral character reference, and allowing licensing by endorsement. Montana ranks in the middle for licensing barriers, with average fees and experience requirements, and while it is one of the only states that allows licensing by endorsement, that barrier reduction is canceled out by the requirement for a moral character reference.

¹⁰² Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Private Investigators, Accessed 5/13/2025.

Professional Engineer¹⁰³

State	Initial Licensing Fee	Number of Exams	Experience or Training	Good Moral Character	License Renewal Fee
California	\$355	2	6 years	No	\$90
Colorado	\$100	2	4 years	No	\$34
Idaho	\$80	2	4 years	No	\$75
Montana	\$75	2	4 years	No	\$37
Nebraska	\$100	3	4 years	Yes	\$40
Nevada	\$25	3	4 years	Yes	\$50
North Dakota	\$150	2	4 years	Yes	\$75
Oregon	\$400	2	4 years	No	\$115
South Dakota	\$100	3	4 years	No	\$80
Utah	\$121	2	4 years	No	\$37
Washington	\$65	2	8 years	No	\$58
Wyoming	\$100	2	4 years	No	\$45

Professional Engineer Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	2
T2	California	1
T2	Idaho	1
T2	Montana	1
T2	Utah	1
T2	Wyoming	1
T3	South Dakota	0
T3	Washington	0
T4	Nevada	-1
T4	North Dakota	-1
T4	Oregon	-1
5	Nebraska	-2

For Professional Engineers, Colorado appears to be the least burdensome state for licensing requirements, due to low renewal fees and no good moral character requirements. Montana ranks the same as many of the other states in this comparison, with lower fees, exam, and experience requirements, and not requiring a good moral character reference. On the whole, the barriers to entry for Professional Engineers appear to be low across the western states.

¹⁰³ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Professional Engineer, Accessed 5/13/2025.

Psychologist¹⁰⁴

State	Initial Licensing Fee	Number of Exams	Experience or Training	Good Moral Character	License Renewal Fee	Reciprocity or Endorsement
California	\$1194	2	3000 hours	No	\$430	Reciprocity
Colorado	\$60	2	1500 hours	No	\$13	Endorsement
Idaho	\$400	1	2000 hours	No	\$250	Endorsement
Montana	\$1150	2	3200 hours	Yes	\$600	Credentials
Nebraska	\$183	2	3000 hours	Yes	\$92	Reciprocity
Nevada	\$175	2	3750 hours	Yes	\$325	No
North Dakota	\$650	2	3000 hours	No	\$250	Credentials
Oregon	\$480	2	3000 hours	Yes	\$300	Endorsement
South Dakota	\$350	2	3300 hours	Yes	\$300	Credentials
Utah	\$230	2	4000 hours	No	\$69	Endorsement
Washington	\$206	2	3300 hours	Yes	\$226	Endorsement
Wyoming	\$475	1	3000 hours	Yes	\$200	Endorsement

Psychologist Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	5
2	Idaho	3
3	North Dakota	2
T4	California	1
T4	Utah	1
T5	Nebraska	0
T5	Oregon	0
T5	South Dakota	0
T5	Washington	0
T5	Wyoming	0
6	Montana	-1
7	Nevada	-2

For Psychologists, Colorado appears to be the least burdensome state for licensing requirements, due to low licensing and renewal fees, low experience requirements, and endorsement availability. Montana ranks second to last on the list, among the highest in both fee categories, and requiring a good moral character reference.

¹⁰⁴ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Psychologists, Accessed 5/14/2025.

Sanitarian¹⁰⁵

State	Initial Licensing Fee	Number of Exams	Experience or Training	Good Moral Character	License Renewal Fee	Reciprocity or Endorsement
California	\$320	1	1.5 years	No	\$103	No
Colorado	-	-	-	-	-	-
Idaho	\$105	1	N/A	Yes	\$50	Reciprocity
Montana	\$200	1	None	No	\$270	No
Nebraska	\$141	1	1-2 years	Yes	\$58	Reciprocity
Nevada	-	-	-	-	-	-
North Dakota	\$50	1	N/A	No	\$15	Reciprocity
Oregon	\$300	2	2 years	No	N/A	Reciprocity
South Dakota	-	-	-	-	-	-
Utah	\$60	1	N/A	No	\$30	No
Washington	\$145	1	1 year	Yes	\$50	Reciprocity
Wyoming	-	-	-	-	-	-

Sanitarian Licensing Burden Rank

Burden Rank	State	Score
1	North Dakota	4
T2	Idaho	0
T2	Montana	0
T2	Nebraska	0
T2	Oregon	0
T2	Utah	0
T2	Washington	0
3	California	-1
-	Colorado	N/A
-	Nevada	N/A
-	South Dakota	N/A
-	Wyoming	N/A

For Sanitarians, North Dakota appears to be the least burdensome state for licensing requirements, due to low licensing and renewal fees, the availability of reciprocity, and not requiring a good moral character reference. Montana ranks the same as the rest of the states, aside from California, with one high barrier and one low barrier, effectively canceling each other out. Based on this data, Sanitarian licensing requirements appear to be the same among neighboring states, in the states that require this license.

¹⁰⁵ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Sanitarians, Accessed 5/14/2025.

Speech-Language Pathologist¹⁰⁶

State	Initial Licensing Fee	Degree	Number of Exams	Experience or Training	License Renewal Fee	Reciprocity or Endorsement
California	\$150	Master's	1	300 hours	\$75	Reciprocity
Colorado	\$10	Master's	1	Fellowship	\$3	Endorsement
Idaho	\$95	Master's	1	1260 hours	\$80	Endorsement
Montana	\$150	Master's	2	36 weeks	\$80	No
Nebraska	\$140	Master's	1	36 weeks	\$70	Endorsement
Nevada	\$250	Certification	0	N/A	\$100	Endorsement
North Dakota	\$350	Master's	1	N/A	\$75	Reciprocity
Oregon	\$345	Master's	1	1260 hours	\$125	No
South Dakota	\$250	Master's	1	Supervision	\$75	Endorsement
Utah	\$70	Master's	1	1 year	\$24	Endorsement
Washington	\$191	Master's	2	1080 hours	\$61	Endorsement
Wyoming	\$300	Degree	1	Fellowship	\$100	Endorsement

Speech-Language Pathologist Licensing Burden Rank

Burden Rank	State	Score
T1	Colorado	3
T1	Nevada	3
2	California	2
T3	Idaho	1
T3	Nebraska	1
T3	South Dakota	1
T3	Wyoming	1
T4	North Dakota	0
T4	Utah	0
T4	Washington	0
T5	Montana	-2
T5	Oregon	-2

For Speech-Language Pathologists, Colorado and Nevada appear to be the least burdensome states for licensing requirements, due to low licensing and renewal fees, endorsement availability for out-of-state applicants, and in Nevada, the opportunity for alternative education and no exam requirements. Montana ranks last on the list, along with Oregon, due to requiring more exams and no reciprocity or endorsement availability; however, the state recently passed a bill allowing substantial equivalency evaluations for all license types, so this is no longer a barrier to entry for Montana.

¹⁰⁶ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Speech-Language Pathologists, Accessed 5/14/2025.

Veterinarian¹⁰⁷

State	Initial Licensing Fee	Number of Exams	Good Moral Character	Continuing Education	License Renewal Fee
California	\$850	3	No	18 hours	\$261
Colorado	\$128	1	No	16 hours	\$72
Idaho	\$275	2	Yes	7.5 hours	\$175
Montana	\$200	2	Yes	10 hours	\$73
Nebraska	\$250	2	No	16 hours	\$84
Nevada	\$200	2	Yes	20 hours	\$250
North Dakota	\$165	2	Yes	12 hours	\$90
Oregon	\$225	2	No	15 hours	\$150
South Dakota	\$175	2	No	16 hours	\$50
Utah	\$150	1	Yes	12 hours	\$42
Washington	\$286	2	Yes	15 hours	\$91
Wyoming	\$300	2	No	12 hours	\$65

Veterinarian Licensing Burden Rank

Burden Rank	State	Score
1	Colorado	2
T2	Nebraska	1
T2	Oregon	1
T2	South Dakota	1
T2	Utah	1
T2	Wyoming	1
3	Idaho	0
T4	Montana	-1
T4	North Dakota	-1
T4	Washington	-1
5	Nevada	-2
6	California	-3

For Veterinarians, Colorado appears to be the least burdensome state for licensing requirements, due to low initial licensing fees, only requiring one exam, and not requiring a moral character reference. Montana ranks toward the bottom of the list, only receiving one negative point for requiring a moral character reference. All the rest of Montana's licensing requirements appear to be similar to the other states.

¹⁰⁷ Data Source: West Virginia University – John Chambers College of Business and Economics, Knee Regulatory Research Center [Occupation Regulation Database](#): Veterinarians, Accessed 5/14/2025.

Appendix E: Unique license types

The following table lists licenses that are issued in less than half of the states in the United States:

License	# of Active Licenses ¹⁰⁸	# of States that License	States that license
Audiology Assistant	12	12	IN, MA, MD, MS, MT, NC, NE, OK, RI, TX, WV, WY
Certified Euthanasia Technician (Veterinary)	39	7	MT, NV, NM, OK, TN, WV, WY
Clinical Laboratory Scientist	876	11	CA, FL, HI, LA, MT, NV, NY, ND, TN, WV
Clinical Laboratory Specialist	45	11	CA, FL, HI, LA, MT, NV, NY, ND, TN, WV
Clinical Laboratory Technician	218	11	CA, FL, HI, LA, MT, NV, NY, ND, TN, WV
Crane Operator	970 ¹⁰⁹	10	CT, HI, MA, MN, MT, NJ, NM, NY, PA, RI
Denturist	23	6	AZ, ID, ME, MT, OR, WA
Direct-Entry Midwife Apprentice	24	8	AK, AR, LA, MT, SC, SD, WA, WY
Embryo Transfer Technician (Veterinary)	9	2	MT, WY
Medical Gas Plumber	92	22	AL, CA, DE, FL, GA, IA, KY, LA, MA, MD, MN, MT, NH, NM, NV, NJ, OK, OR, TX, UT, WA, WY
Naturopathic Physician	161	22	AK, AZ, CA, CO, CT, HI, ID, KS, MA, MD, ME, MN, MT, NH, NM, ND, OR, RI, UT, VT, WA, WI
Speech-Pathologist Audiologist	6	7	AL, AR, IA, LA, ME, MO, MT

¹⁰⁸ Data provided by the DLI Licensing Division – accurate as of 5/27/2025.

¹⁰⁹ Crane Operator total of 970 includes: Crane Hoisting 1st class: 190; Crane Hoisting 2nd Class: 9; Gantry and Overhead Crane: 1; Hydraulic Boom Truck 2nd Class: 117; Mine Hoist Operator 1st Class: 12; Mine Hoist Operator 2nd Class: 0; Oiler 3rd Class (majority are DLI employees to ensure compliance with crane examination laws): 13; Tower Crane 1st class: 5; Tower Crane 2nd Class: 108

Appendix F: Occupations by category

Healthcare	Community & Social Services	Professional Services	Trades
Acupuncture	Addiction Counselor	Architecture	Barbers & Cosmetologists
Athletic Trainer	Behavioral Health Peer Support	Engineers & Surveyors	Boiler Engineers & Operators
Chiropractic	*Community Health Worker	Home Inspectors	Construction Blasting
Clinical Laboratory Science	*Doula	Landscape Architecture	Contractors
Dentistry, Dental Hygiene, Dentistry	Genetic Counseling	Property Managers	Crane & Hoist Operators
Direct-Entry Midwifery	Marriage & Family Therapist	Public Accountants	Electricians
Hearing Aid Dispensers	Morticians & Funeral Services	Real Estate Appraisers	Elevator Contractors
Massage Therapy	Nursing Home Administrators	Real Estate Brokers & Salespersons	Fire Protection
Medicine	Professional Counseling	Outfitters & Guides	Plumbers
Naturopathic Physicians	Social Workers	Private Investigators & Private Security	
Nursing	Sanitarians		
Nutritionists	Veterinary Medicine		
Occupational Therapists			
Optometry			
Pharmacy			

Healthcare	Community & Social Services	Professional Services	Trades
Physical Therapists			
Physician Assistants			
Podiatry			
Psychologists			
Radiologic Technologists			
Respiratory Care Practitioners			
Speech-Language Pathologists & Audiologists			

Appendix G: Entities Providing Review and Oversight¹¹⁰

When looking at potential sunrise or sunset review policy, the Legislature must determine the makeup and functions of the review committee. The following are examples of entities in other states that exist solely or substantially for review and oversight functions.

Legislative Committees:

1. **Joint Legislative Oversight and Sunset Committee** (Delaware)
This permanent committee performs periodic sunset reviews of Delaware’s agencies, commissions, and boards. Reviews are typically scheduled every six years but may be reviewed more frequently at the committee’s discretion. The committee holds hearings, conducts performance evaluations, and reviews reports before issuing a final report with recommendations. If the committee recommends termination, and the agency, board, or commission is not re-established by the state’s General Assembly, then the agency, board, or commission is automatically terminated.
2. **Legislative Council** (Arkansas)
Pursuant to the Arkansas Red Tape Reduction Sunrise and Sunset Act of 2019, the Legislative Council is responsible for conducting sunrise and sunset review but may establish subcommittees for assistance.
3. **Jobs Creation Committee** (Indiana)
This committee was established in 2014 to conduct a five-year review of the “efficiency and effectiveness of all professional licenses regulated by the Indiana Professional Licensing Agency,” which regulates over 70 professional licenses. The committee issues annual reports, including its findings and recommendations related to its study.
4. **Sunset Subcommittee of the Legislative Commission** (Nevada)
This permanent subcommittee conducts ongoing oversight and evaluation of agencies, boards, and commissions. The committee must conduct sunset reviews of at least ten boards and commissions per interim.
5. **Sunset Review Committee** (Ohio)
This permanent committee is tasked with evaluating the usefulness, performance, and effectiveness of state agencies and boards, including boards that regulate occupations. The committee’s recommendations are made to the full Legislature in the form of legislation.

¹¹⁰ Matt Drake, *Review and Oversight of Occupational Licensing Laws and Rules*, Prepared for the Occupational Licensing and Certification Laws Interim Committee, Idaho Legislature, August 27, 2019, https://legislature.idaho.gov/wp-content/uploads/sessioninfo/2019/interim/190827_olcl_03_DRAKE_SunriseSunset.pdf, accessed 6/10/2025

6. **Sunset Advisory Commission** (Texas)

This permanent commission includes two public members as well as ten legislators. Under the Sunset Act, an agency will be automatically abolished unless the Legislature votes to retain the agency. The Sunset Advisory Commission typically conducts its review of an agency every 12 years and develops legislation based on its recommendations for consideration by the full Legislature.

7. **Occupational and Professional Licensure Review Committee** (Utah)

This permanent committee, composed of legislators and a few members of the public, conducts sunrise review, sunset reviews, and any review of licensure requirements requested by a legislative committee.

Other Entities:

1. **Regulatory Review Council** (Arizona)

This council, located in the governor's office, conducts sunrise reviews of every new agency rule prior to implementation to assess the rule's legality and potential impacts. The council also conducts a rotating review of all existing rules.

2. **Red Tape Reduction Working Group** (Arkansas)

This working group, appointed by the Governor, is tasked with conducting a comprehensive review of the state's occupational laws and rules and identifying ways to reduce regulation without compromising public safety.

3. **Office of Policy, Research, and Regulatory Reform** (Colorado)

This office, located in Colorado's Department of Regulatory Agencies, reviews every proposed occupational regulation to determine if such regulation is necessary. The office also reviews existing occupational regulations to determine if they are "necessary, fair, effective, and efficient." The office's recommendations are forwarded to Colorado's General Assembly for sunrise or sunset action.

4. **Occupational Regulation Review Council** (Georgia)

This council reviews all legislation intended to license or certify occupations that are not yet regulated. The council considers whether regulation of the occupation is necessary to protect public health and safety and whether the people may be better protected by means other than licensing or certification. Recommendations are then made to the Legislature.

5. **Occupational Licensing Review Commission** (Louisiana)

The commission is composed of state officers, including the governor, or their designees. Starting in 2019, any licensing board that wants to promulgate occupational regulations must submit the proposed regulations to the commission for approval.

6. **Occupational Licensing Review Commission** (Mississippi)
Created in 2017, this commission, like Louisiana's, is composed of state officers or their designees, and approves, amends, or disapproves occupational regulations filed by licensing boards.

7. **Boards and Commissions Task Force** (Missouri)
This task force was appointed by the governor in 2017 to review all of Missouri's boards and commissions, including licensing boards. In its final report, the task force recommended consolidating or eliminating numerous boards and commissions, which would reduce gubernatorial appointments by 450.

8. **Occupational Licensing Advisory Commission** (Oklahoma)
Conducts reviews of each occupational or professional licensing act every four years and makes recommendations to the Legislature regarding any action that should be taken on them. Additionally, reviews proposed legislation that would impose new licensing requirements.

9. **Office of Professional Regulation** (Vermont)
This office conducts sunrise reviews and recommends to the Legislature whether an occupation should be regulated.

Appendix H: Sunrise and Sunset Review Statutes by State

Sunrise review statutes:

Arizona (health-related occupations): [Ariz. Rev. Stat. Ann. §§ 32-3101 to 3108](#)

Colorado: [Colo. Rev. Stat. Ann § 24-34-104.1](#)

Florida: [Fla. Stat. Ann. § 11.62](#)

Georgia: [Ga. Code Ann. §§ 43-1A-1 to -9](#)

Hawaii: [Haw. Rev. Stat. §§ 26H-1 to -7](#)

Kansas (health-related occupations): [Kan. Stat. Ann. §§ 65-5001 to -5011](#)

Maine: [Me. Stat. tit. 5, § 12015](#); [Me. Stat. tit. 32, § 60-J, -K, -L](#)

Minnesota (health-related occupations): [Minn. Stat. Ann. §§ 214.001 to .002](#)

Nebraska (health-related occupations): [Neb. Rev. Stat. Ann. §§ 71-6201 to -6229](#)

South Carolina: [S.C. Code Ann. §§ 1-18-10 to -70](#)

Utah: [Utah Code Ann. §§ 36-23-101 to -109](#)

Vermont: [Vt. Stat. Ann. Tit. 26, §§ 3101 to -3107](#); [04-030 Vt. Code R. §§ 3-1.1 to 3-2.3](#)

Virginia:

Health-related occupations: [Va. Code Ann. §§ 54.1-2510; 54.1-100](#); *Policies and Procedures for the Evaluation of the Need to Regulate Health Occupations and Professions*, Guidance Document No. 75-2, revised February 25, 2019, available at: [Virginia Board of Health Professions - Guidance Documents](#)

Non-health-related occupations: [Va. Code Ann. §§ 54.1-100, -300, -310.1, -311](#)

Washington:

Health-related occupations: [Wash. Rev. Code Ann. §§ 18.120.010 to -040](#)

Non-health-related occupations: [Wash. Rev. Code Ann. §§ 18.118.005 to -040](#)

West Virginia: [W. Va. Code Ann. §§ 30-1A-1 to -6](#)

Sunset Acts:

The Council of States Governments maintains a “Book of the States” which includes a summary of sunset legislation throughout the country. Data as of 2023: [Summary of Sunset Legislation – Book of the States](#)