

Licensing Reform Task Force Barriers Subcommittee

LICENSING QUALIFICATION BARRIERS

At the Barriers Subcommittee’s organizational meeting on March 6, 2026, the committee requested a listing of licensing qualifications that may be potential barriers.

The following pages include tables of the various potential barriers and list which occupations include the specific qualification in statute.

Included in the tables are:

- Minimum age requirements
- Minimum education requirements
- “Good moral character” requirement
- Letters of reference

Two additional comparison tables show:

- Occupations licensed in Montana but licensed in less than half of the states
- Commonly licensed occupations with differing requirements for education, experience, and exams compared to neighboring states



Montana Department of
LABOR & INDUSTRY

Minimum Age Requirements

Occupation	Statute	Min. Age
Acupuncturist	37-13-302	18
Barbers & Cosmetologists:		
• Barber		
• Barber Non-Chemical	37-31-304	
• Cosmetologist	37-31-305	18
• Electrologist		
• Esthetician		
• Manicurist		
Boiler Engineers:		
• Agricultural-Class Boiler Engineer		
• First-Class Boiler Engineer		
• Limited Low-Pressure Boiler Engineer	50-74-304	
• Low-Pressure Boiler Engineer	50-74-307	18
• Second-Class Boiler Engineer		
• Third-Class Boiler Engineer		
• Traction Engineer		
Crane and Hoist Engineers:		
• First-Class Crane and Hoist Engineer	50-76-103	18
• Second-Class Crane and Hoist Engineer		
• Third-Class Crane and Hoist Engineer		
Crematory Operator	37-19-703	18
Construction Blaster	37-72-301	18
Direct-Entry Midwife	37-27-201	21
Fireworks Wholesaler Permit	50-37-104	18

Minimum Age Requirements *(continued)*

Occupation	Statute	Min. Age
Guide	37-47-303	18
Massage Therapist	37-33-502	18
Mortician	37-19-302	18
Outfitter	37-47-302	18
Physical Therapy:		
• Physical Therapist	37-11-303	18
• Physical Therapist Assistant		
Private Security:		
• Private Investigator	37-60-303	18
• Private Security Firearms Instructor		
• Private Security Guard		
• Registered Process Server		
• Security Alarm Installer		
Psychologist	37-17-302	18
	37-17-319	
Radiologic Technologists	37-14-302	18
	37-14-306	
Real Estate:		
• Real Estate Broker	37-51-302	18
• Real Estate Salesperson		
Real Property Manager	37-56-105	18
Veterinarian	37-18-305	Evidence as to fitness of age

Minimum Education Requirements

HIGH SCHOOL DIPLOMA REQUIRED

Occupation	Statute
Barbers & Cosmetologists: <ul style="list-style-type: none"> • Barber • Barber Non-Chemical • Cosmetologist • Electrologist • Esthetician • Manicurist1 	37-31-304
Crematory Operator	37-19-703
Direct-Entry Midwife	37-27-201
Hearing Aid Dispenser	37-16-402
Licensed Practical Nurse	37-8-415
Massage Therapist	37-33-502
Medication Aide II	37-8-423
Nursing Home Administrator	37-9-301
Private Security: <ul style="list-style-type: none"> • Private Investigator • Private Security Firearms Instructor • Private Security Guard • Registered Process Server • Security Alarm Installer 	37-60-303
Real Estate: <ul style="list-style-type: none"> • Real Estate Broker • Real Estate Salesperson 	37-51-302
Real Property Manager	37-56-105
Registered Nurse	37-8-405
Respiratory Care Practitioner	37-28-202

Letters of Reference

Occupation	Statute	Occupation	Statute
Athletic Trainer	37-36-201	Land Surveyor Intern	37-67-326
Dental Hygienist	37-4-402	Professional Engineer	37-67-323
Dentist	37-4-301	Professional Land Surveyor	37-67-325
Engineer Intern	37-67-324		

Good Moral Character Requirements

Occupation	Statute	Occupation	Statute
Acupuncturist	37-13-302	Optometrist	37-10-302
Barbers & Cosmetologists:		Pharmacist	37-7-302
• Barber		Physical Therapist	37-11-303
• Barber Non-Chemical		Physician	37-3-305
• Cosmetologist	37-31-304	Physician Assistant	37-20-402
• Electrologist		Podiatrist	37-6-302
• Esthetician		Private Security:	
• Manicurist		• Private Investigator	
Behavioral Analyst	37-17-403	• Private Security Firearms Instructor	37-60-303
Certified Public Accountant	37-50-302 37-50-330	• Private Security Guard	
Chiropractor	37-12-302	• Registered Process Server	
Construction Blaster	37-72-301	• Security Alarm Installer	
Crematory Operator	37-19-703	Psychologist	37-17-302 37-17-319
Dentist	37-4-301	Radiologic Technologist	37-14-302 37-14-306
Dental Hygienist	37-4-402	Real Estate Appraiser	37-54-202 37-54-503 37-54-504
Direct-Entry Midwife	37-27-201	Real Estate:	
Engineer Intern	37-67-101	• Real Estate Broker	37-51-302
Fireworks Wholesaler Permit	50-37-104	• Real Estate Salesperson	
Massage Therapist	37-33-502	Veterinarian	37-18-302 37-18-305
Mortician	37-19-302		
Naturopathic Physician	37-26-402		
Nursing Home Administrator	37-9-203 37-9-301		

Unique License Types

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

Occupation	# of Active Licenses ¹	# 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 ²	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
Doula	7	2	AZ, MT
Electrologist	29	11	AR, CA, DE, IN, KS, MA, ME, MT, NV, NM, WI
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
Pediatric Complex Care Assistant	38	2	AZ, MT
Speech-Pathologist Audiologist	6	7	AL, AR, IA, LA, ME, MO, MT

¹Data provided by the DLI Licensing Division - accurate as of 5/7/2025.

²Crane 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.

“3-E” Comparison with Neighboring States

The following table shows a comparison of commonly licensed occupations with differing requirements for education, experience, and exams. Only categories where there is a variance are shown. For example, if all states require the same level of education, the information is omitted, as it is considered an equal burden across the states. If a requirement in Montana’s statute is more burdensome than neighboring states, it is indicated in red.

The states included in the comparison are: California, Colorado, Idaho, Nebraska, Nevada, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.

Occupation	Degree	Degree Range	Number of Exams	Exam Range	Experience or Training	Experience Range
Acupuncturist	-	-	4	1-6	1000 hours	1000-3000
Audiologist	Doctorate	Masters - Doctorate	2	0-2	None	None-1 year
Barber/Barber Non-Chemical	HS	None-Bachelors	2	1-3	1100/900	900-1800
Chiropractor	-	-	2	1-2	-	-
Certified Public Accountant	120 credits	120-150	5	5-6	2000 hours	1800-4000
Cosmetologist	HS	None-HS	2	1-3	1500 hours	1000-1800
Dental Hygienist	-	-	3	2-4	-	-
Dentist	-	-	3	2-3	-	-
Direct-Entry Midwife	HS	None-HS	1	1-3	-	-
Emergency Medical Technician	-	-	2	1-2	-	-
Esthetician	HS	None-HS	2	1-3	650 hours	600-750
Family & Marriage Therapist	-	-	1	1-2	3000 hours	1700-4000
Hearing Aid Dispenser	HS	None - Associates	3	1-3	None	None- 1 year
Journeyman Electrician	-	-	1	1-3	8000 hours	8000-8288

Occupation	Degree	Degree Range	Number of Exams	Exam Range	Experience or Training	Experience Range
Journeyman Plumber	-	-	1	1-2	7500 hours	1900-9500
Landscape Architect	-	-	1	1-2	2-8 years	0-8 years
Manicurist	HS	None-HS	-	-	400 hours	350-600
Massage Therapist	HS	None-HS	1	1-2	500 hours	500-1000
Mortician	Associates	None - Associates	2	1-3	1 year	None-1 year
Occupational Therapist	-	-	1	1-2	-	-
Optometrist	-	-	4	3-5	-	-
Pharmacist	-	-	2	1-2	1500 hours	1200-2000
Pharmacy Technician	HS	None-HS	-	-	-	-
Physical Therapist	-	-	2	1-2	-	-
Private Investigator	-	-	-	-	6000 hours	1500-10000
Professional Engineer	-	-	2	2-3	4 years	4-8 years
Psychologist	-	-	2	1-2	3200 hours	1500-4000
Sanitarian	-	-	1	1-2	None	None - 2 years
Speech-Language Pathologist	Master's	Certification - Master's	2	0-2	36 weeks	300 hours - 1 year
Veterinarian	-	-	2	1-3	-	-