

**MONTANA DEPARTMENT OF LABOR & INDUSTRY**

**RED TAPE RELIEF INITIATIVE  
OUTREACH REPORT**

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**2023**



Montana Department of  
**LABOR & INDUSTRY**



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## PROJECT BACKGROUND

Title 37 of Montana statute covers professional, occupational, and healthcare licensing. Over the years additional language was added to the individual chapters of Title 37, causing the standard processes and methods associated with all licensing to be customized and no longer efficient or agile. This lead directly to licensing times being increased, and the lack of standardization negatively affected licensing portability, which effected workforce numbers for businesses.

In connection with the Governor's Red Tape Reduction Initiative, the Department has worked with stakeholders and licensees to tease out those areas of the statute that have become onerous, burdensome, outdated, and overly regulatory. With the goal of modernizing the language and the processes of licensing in support of continued public safety; and for the benefit of licensees and the businesses that employ them.

The Department began this project by launching an aggressive outreach team who compiled this report. The project had two primary purposes. An educational component to inform stakeholders of the project's goal while educating them on some of the concepts associated with the draft proposals. Next, seek stakeholder comments and feedback on the proposals as they were drafted.



## PROJECT GOALS

Provide an outlet for informing and educating the public, professional, and healthcare licensees on what explorations the Department is undertaking in support of the Governor's Red Tape Reduction Initiative.

Provide an opportunity for the public and licensees to provide feedback to various issues, concepts, and proposals the Department's exploratory efforts yield in support of the Red Tape Reduction Initiative.



## EDUCATIONAL SESSIONS

The Montana Department of Labor & Industry's Employment Standards Division (ESD) held a series of five informational sessions from August 2022 through December 2022.

In connection with the Governor's Red Tape Reduction Initiative, the Department explored new methods working directly with stakeholders to bring effective reform regarding the way licensing is administered and maintained in Montana, to reduce regulations and costs to licensees.

Each session included an overview of educational materials, bill drafts available for comment, and a synopsis of comments received. An in-person public comment session was also held in Helena. Two sessions incorporated a live question-and-answer interface with attendees. Recordings of all sessions were uploaded within 48 hours of the live session. A comment portal and a dedicated email inbox were available for submissions to the Department throughout this process.

Here are the dates of the educational sessions:

8-31-2022  
9-29-2022  
10-17-2022  
11-17-2022  
12-15-2022

Montana Department of Labor & Industry  
Educational Webinar

Wednesday, August 31, 2022

10:00 a.m.

Conference Call Information:

[https://mt-gov.zoom.us/webinar/register/WN\\_IE1y8EpLSsaMCW7UAli9zg](https://mt-gov.zoom.us/webinar/register/WN_IE1y8EpLSsaMCW7UAli9zg)

Please register prior to the meeting in order to attend the live session.

1. Presentation – 1st in a series of Listening Sessions – Modernizing Professional Licensing
  - a. Purpose of Listening Sessions
  - b. Legal Landscape of Licensing in Montana
  - c. Governor’s Red Tape Reduction Initiative
  - d. Legislative Solutions
  - e. How to Participate in Process
  - f. Next Steps
2. Adjourn

Please submit comments and questions to <https://boards.bsd.dli.mt.gov/educational-sessions>  
under ‘Comment Submissions’ [THE COMMENT SUBMISSION PORTAL IS NOW CLOSED]

The Department of Labor & Industry is committed to providing meeting access through reasonable accommodation under the Americans with Disabilities Act. Please contact the Business Standards Division office at (406) 841-2081 prior to the proposed meeting date for further information.

New agenda items may be added up to “two business days” before the meeting. For the most accurate agenda, please consult the educational sessions site at [DLI Educational Sessions \(mt.gov\)](https://dli.mt.gov/educational-sessions).



Montana Department of Labor & Industry  
Educational Webinar

Thursday, September 29<sup>th</sup>, 2022  
10:00 a.m.

Conference Call Information:

[https://mt-gov.zoom.us/webinar/register/WN\\_wlJAfhL\\_TrKpEtFsNV8YDQ](https://mt-gov.zoom.us/webinar/register/WN_wlJAfhL_TrKpEtFsNV8YDQ)

Please register prior to the meeting in order to attend the live session.

1. Presentation – 2nd in a Series of Listening Sessions - Modernizing Licensing Laws
  - a. Review of Website Information/Layout
  - b. Overview of New Draft Documents
  - c. Review of Comments Submitted
  - d. Discussion of Board vs. Program Administration
  - e. Q &A Opportunity
  - f. Next Steps
2. Adjourn

Please submit comments and questions to  
<https://boards.bsd.dli.mt.gov/educational-sessions> under ‘Comment Submissions’  
[THE COMMENT SUBMISSION PORTAL IS NOW CLOSED]

The Department of Labor & Industry is committed to providing meeting access through reasonable accommodation under the Americans with Disabilities Act. Please contact the Business Standards Division office at (406) 841-2081 prior to the proposed meeting date for further information. New agenda items may be added up to “two business days” before the meeting. For the most accurate agenda, please consult the educational sessions site at [DLI Educational Sessions \(mt.gov\)](https://dli.mt.gov/educational-sessions).

Montana Department of Labor & Industry  
Educational – Live Session

Monday, October 17, 2022

12:30 p.m.

Delta Hotel – 2301 Colonial Dr, Helena, MT

Please register prior to the meeting in order to attend the live session at the link below.

Presentation – 3rd in a series of Listening Sessions – Modernizing Professional Licensing

Agenda:

1. Overview of Newest Draft Documents on Website
2. Discuss Revision Process of All Drafts
3. Title 37 Reform Summary
4. Discuss How Title 37 Reform Preserves Title Protection
5. Receive Your Comments
6. Next Steps

Adjourn

Please submit comments to <https://boards.bsd.dli.mt.gov/educational-sessions> under ‘Comment Submissions’ [THE COMMENT SUBMISSION PORTAL IS NOW CLOSED]

The Department of Labor & Industry is committed to providing meeting access through reasonable accommodation under the Americans with Disabilities Act. Please contact the Business Standards Division office at (406) 841-2081 prior to the proposed meeting date for further information.

New agenda items may be added up to “two business days” before the meeting. For the most accurate agenda, please consult the educational sessions site at [DLI Educational Sessions \(mt.gov\)](https://dli.mt.gov/educational-sessions).



Montana Department of Labor & Industry  
Educational Webinar

Thursday, November 17<sup>th</sup>, 2022  
10:00 a.m.

Conference Call Information:

[https://mt.gov.zoom.us/webinar/register/WN\\_Cb17XaeCQwi2Ca9qS\\_92xw](https://mt.gov.zoom.us/webinar/register/WN_Cb17XaeCQwi2Ca9qS_92xw)

Please register prior to the meeting in order to attend the live session.

1. Presentation – 4<sup>th</sup> in a Series of Listening Sessions - Modernizing Licensing Laws
  - a. Review Website “Drafts” and “Educational Materials”- Status
  - b. Review Current Comments
  - c. Title Protection Review - What is it and how is it maintained and reinforced
  - d. Review Licensing Mission - What is it and what is it not
  - e. Review - Board vs. Program Administration - it’s a method change
  - f. What happens if a license type is no longer a license type?
  - g. Cultivation of Subject Matter Expertise (SME) and Why?
  - h. Q & A Opportunity
  - i. Next Steps (Final Steps)
2. Adjourn

Please submit comments and questions to

<https://boards.bsd.dli.mt.gov/educational-sessions> under ‘Comment Submissions’

[THE COMMENT SUBMISSION PORTAL IS NOW CLOSED]

The Department of Labor & Industry is committed to providing meeting access through reasonable accommodation under the Americans with Disabilities Act. Please contact the Business Standards Division office at (406) 841-2081 prior to the proposed meeting date for further information.

New agenda items may be added up to “two business days” before the meeting. For the most accurate agenda, please consult the educational sessions site at [DLI Educational Sessions \(mt.gov\)](https://boards.bsd.dli.mt.gov/educational-sessions).



Montana Department of Labor & Industry  
Educational Webinar

Thursday, December 15<sup>th</sup>, 2022  
10:00 a.m.

Conference Call Information:

[https://mt-gov.zoom.us/webinar/register/WN\\_OnE5eGf7SZi\\_Ug7HvMfJ0g](https://mt-gov.zoom.us/webinar/register/WN_OnE5eGf7SZi_Ug7HvMfJ0g)

Please register prior to the meeting in order to attend the live session.

1. Presentation – 5<sup>th</sup> in a Series of Listening Sessions - Modernizing Licensing Laws
  - a. Review Website – Status
  - b. Latest Bills and Revisions
  - c. Review Comments
  - d. Draft Summary Review
  - e. Final Report Timeline
  - f. Final Steps
2. Adjourn

Please submit comments and questions to

<https://boards.bsd.dli.mt.gov/educational-sessions> under ‘Comment Submissions’

[THE COMMENT SUBMISSION PORTAL IS NOW CLOSED]

The Department of Labor & Industry is committed to providing meeting access through reasonable accommodation under the Americans with Disabilities Act. Please contact the Business Standards Division office at (406) 841-2081 prior to the proposed meeting date for further information. New agenda items may be added up to “two business days” before the meeting. For the most accurate agenda, please consult the educational sessions site at [DLI Educational Sessions \(mt.gov\)](https://boards.bsd.dli.mt.gov/educational-sessions).



Montana Department of  
**LABOR & INDUSTRY**

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LEGISLATIVE  
LISTENING SESSIONS



Montana Department of  
**LABOR & INDUSTRY**

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PROFESSIONAL AND  
OCCUPATIONAL LICENSING



Montana Department of  
**LABOR & INDUSTRY**

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HEALTHCARE  
LICENSING

## Modernizing Licensing Laws

### Purpose of these sessions:

- To provide an outlet for informing and educating the public and professional and healthcare licensees on what explorations the department is undertaking in support of the Governor's Red Tape Reduction Initiative.
- To provide an opportunity for the public and licensees to provide feedback to various issues, concepts, and proposals that the department's exploratory efforts yields in support of the Red Tape Reduction Initiative.

## Department of Labor and Industry Business Standards Division:

### **One of the Bureau's that are under the oversight of the Business Standards Division (BSD):**

- **Professional Licensing Bureau** – Administers professional, occupational, and healthcare licensing for the state of Montana for more than 150 license types for **32** licensing boards and **6** licensing programs – currently **16%** of our licensing is accomplished through program administration in lieu of a board administration.

## Professional Licensing Bureau Goals & Objectives

- Goal #1: Provide efficient, effective administrative and professional services to assist boards in their duty to protect the health, safety, and welfare of the public.**
- Goal #2: Provide friendly, prompt, efficient, and effective services to our customers (customers include both the general public we protect and the license applicants).**
- Goal #3: License and renew individuals and businesses through efficient, effective, and reliable processes.**

## Professional Licensing Bureau Legal Landscape

### Legislative Mandated Provisions:

Title 37, Chapter 1, Parts 1 through 4 – General Provisions  
Title 37, Chapters 2 through 73 – Specific Provisions for Board-Based and Program-Based Professions and Occupations  
Boards are administratively attached to the department as provided in 2-15-121 MCA

## Professional Licensing Bureau Legal Landscape (cont'd)

### Administrative Rules:

24.101 – Standardized Rules for Boards and Programs (Division Rules)  
Chapter 24 – Also contains individual rules for the 32 existing licensing boards and 6 licensing programs

## Professional Licensing Bureau Legal Landscape (cont'd)

### Legislative Mandate to seek and sustain efficiency:

**37-1-104. Standardized forms.** The department **shall** adopt standardized forms and processes to be used by the boards and department programs. The standardization is to streamline processes, expedite services, reduce costs and waste, and facilitate computerization.

## Help Cut Red Tape

### Executive Order No. 1-2021

Gov. Gianforte and Lt. Governor Juras know that excessive, outdated, and unnecessary regulations are a wet blanket on job creators of all sizes in Montana.

They're conducting a comprehensive regulatory review and will implement a package of reforms that will open Montana for business, grow our economy, and create good-paying Montana jobs.

The comprehensive review will revise necessary but over-complicated regulations to simplify compliance, ensuring they are user-friendly and easy to understand.

The process will be thorough and careful to preserve regulations necessary to implement legislative directives, including the protection of consumer safety and public health.

## Help Cut Red Tape

Like other state agencies, the Department of Labor & Industry has been asked to contribute to the Red Tape Reduction Initiative by exploring changes to the current framework, structure, and processes associated with Professional and Occupational licensing that result in the elimination or reduction of excessive, outdated, unnecessary, or burdensome regulations.

## Help Cut Red Tape

### Specific to Professional and Occupational Licensing Red Tape Reduction is focused in two overarching areas:

1. Regulatory Reform – modifying or eliminating areas of current law that are no longer required to be in force to carry out the core mission of public safety. This includes reviewing and modifying both licensing statutes and administrative rules.
2. Licensing Processing Efficiency and Reform – process re-engineering, elimination of outdated or burdensome requirements, and updating service delivery methods. This will include some regulatory reforms and board policy changes.

## Solutions Being Explored

The department is exploring new methods to work directly with stakeholders to bring effective reform to how licensing is administered in Montana to reduce regulations.

There are three main areas of reform exploration:

- o **Modernizing Licensing Laws (Review and Reform of Title 37 of Montana Statutes)**
- o **Increase License Mobility and Processing Efficiency**
- o **Restructuring Board Governance**

## Legislative Solutions: Modernizing Licensing Laws

- o Entails Title 37 of Montana Statutes (these are the Montana Code Annotated Professional and Occupations chapters that outline state laws related to administration and governance);
- o Modernize and standardize language to reduce redundancies, ensure sound licensing practices, and remove obsolete language;
- o Review legal-technical language to minimize unnecessary red tape.

## Legislative Solutions: Increase License Mobility & Processing Efficiency

- o Strengthen the department's ability to recognize licenses issued in another state when those licensing requirements are substantially equal to Montana's requirements;
- o Expand license exemptions for military spouses;
- o Address licensing delays created by fingerprint background checks;
- o Increase availability and duration of temporary licenses;
- o Standardize continuing education.

## Legislative Solutions: Restructuring Board Governance

- o Determine what professions are better managed as programs or through voluntary certification rather than investing in the full board infrastructure;
- o Review where multiple boards may be combined;
- o Evaluate board composition for number of appointees, terms of service, qualifications, and conflicts of interest. Standardize these processes across all boards to promote additional efficiencies.

## How To Participate

### Tools:

- o Surveying – Conversation Starter
- o Listening Sessions – Give and Get Information
- o Information Hub – Web page for Participating
- o 24/7 Feedback – Provide Your Comments

## Tools - Surveying

**In June and July of 2022** – we started off by surveying more than 100,000 people, including licensees, board members, associations, other policymakers, and members of the general public. Surveying included:

- o Private Security Companies
- o **Montana Occupational and Healthcare Licensing Policy and Governance**
- o Sanitarian Licensees
- o Nutritionists Licensees
- o Outfitter Licensees
- o Guide Licensees
- o Real Estate Appraisers and Realty Regulation
- o Private Security Licensees
- o Hearing Aid Dispenser Licensees
- o Landscape Architects Licensees
- o Architects Licensees
- o Process Server Licensees
- o Athletic Trainer Licensees
- o Chiropractic Licensees
- o Radiologic Technologists Licensees
- o Clinical Laboratory Science

## Tools – Listening Sessions

**3 additional sessions already on the books:  
September 29<sup>th</sup>, October 28<sup>th</sup>, and December 1<sup>st</sup>.**

- Information on times will be on the website as will any information dedicated to each meeting.
- As relayed, these sessions will become more interactive once we have specific idea, concepts, or proposals to review and discuss.
- DO NOT wait for a session to express your opinion or provide feedback – visit the site and see updated information and provide comments through the comment process so we can be as agile as possible with revisions that stem from your comments.



## Tools – Information Hub

<https://boards.bsd.dli.mt.gov/educational-sessions>

### Information on:

- Listening Sessions
- Reform concepts to get us started.
- Educational Materials
- Comment Submissions



## Tools – 24/7 Feedback

<https://boards.bsd.dli.mt.gov/educational-sessions>

### ○ Comment Submissions:

- Most vital part of this process – getting your comments
- Don't wait for a listening session – need timely (day-to-day) comments to drive final ideas/proposals
- Participate – Be part of the Solution!



## Next Steps.....

- Department continues to explore ideas and concepts within the stated theme of modernizing licensing laws.
- Department continues to develop specific revision language to sections of statute and rule in support of Red Tape Reduction Initiative.
- Summaries of ideas and concepts posted to the new website for review by interested parties to gain feedback.
- Next Listening Session Meeting (September 29<sup>th</sup>) reviews all proposed language to date with stakeholders to gain further feedback.



## Contact:

For more information or to submit a solution or comment  
please visit:

<https://boards.bsd.dli.mt.gov/educational-sessions>

or

Any Licensing Board or Program Website





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LEGISLATIVE  
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PROFESSIONAL AND  
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HEALTHCARE  
LICENSING

## Modernizing Licensing Laws

### Purpose of these sessions:

- o To provide an outlet for informing and educating the public and professional and healthcare licensees on what explorations the department is undertaking in support of the Governor's Red Tape Reduction Initiative.
- o To provide an opportunity for the public and licensees to provide feedback to various issues, concepts, and proposals that the department's exploratory efforts yields in support of the Red Tape Reduction Initiative.



## Modernizing Licensing Laws

### Agenda for Today:

1. Review Website Information/Layout
2. Overview of New Draft Documents
3. Review Previous/Current Comments/Questions
4. Discuss Board vs. Program Administration
5. Q and A Opportunity
6. Next Steps.....



## Review Website Information/Layout

<https://boards.bsd.dli.mt.gov/educational-sessions>

### Information on:

- o **Listening Sessions**
- o **Draft Documents or concepts to Review.**
- o **Educational Materials, summaries of drafts, etc.**
- o **Comment Submissions\*\*\***



## Overview of New Draft Documents

### Proposed "Drafts for Public Comment" (To Date)

- o "Title 37 Reform"
- o "Board Consistency Reform"
- o "Licensing Enforcement Reform"

### Supporting Documents

- o Title 37 Reform Memorandum (1 page)
- o Title 37 Licensing Legislative Proposals (15 Page)



## Overview of New Draft Documents

### o "Title 37 Reform"

- o Comprehensive legislative package affecting Montana professional and occupational licensing to address "excessive, outdated, unnecessary, or burdensome" regulations.
- o Increased agility and flexibility to License by Endorsement – Increasing License Mobility for Licensees from Other States.
- o Creates a "provisional" license to allow licensure pending a fingerprint and background check or verification of additional information provided the applicant has attested to having no adverse licensure, criminal, employment, or other history.



## Overview of New Draft Documents

### o "Title 37 Reform"

- o Removes unnecessary repetition of unprofessional conduct provisions and consolidates those provisions in one chapter.
- o Adopts uniform language as applicable to defining the scope of practice, the title of the license type that may engage in the practice, title protection, and unprofessional conduct; as well as establishing licensing qualification and standards of practice.
- o Repeals 35 verbatim rules to simplify the "relevant military training, service, or education" equivalencies for licensing requirements into a single chapter.



## Overview of New Draft Documents

### “Board Consistency Reform”

- Currently, each licensing board in Montana has independent term limits and qualifications for appointment to their board, leading the Department to govern a patchwork of separate rules and regulations across its 32 boards.
- Standardizes appointment procedures, terms, and qualifications for every board member across all boards and places these requirements and processes into one chapter of code.



## Overview of New Draft Documents

### “Licensing Enforcement Reform”

- Standardizes cease and desist, injunctive, and criminal actions across all boards and programs.
- Sets specific and standardized penalties across all boards.
- Removes 61 sections of code to bring all enforcement actions under one chapter.



## Review Previous/Current Comments/Questions

First, by the numbers....

Website went live – 8/8/2022

Comments received from 8/8 to 8/30 – **50**

Comments Received from 8/31 to 9/18 – **37**

Comments received from 9/19 to 9/28 – **48**



## Review Previous/Current Comments/Questions

General Notes....

- Each comment received is met with a return email acknowledging the comment and thanking the sender for taking the time to comment and inviting them to participate at future sessions.
- Every comment is being archived, analyzed for the nature of the comment and for which draft it belongs to or whether it is a general comment (Non-draft specific).



## Review Previous/Current Comments/Questions

General Notes....

- Each comment received regarding a draft is shared with the Red Tape Reduction team in the division for consideration to develop and further edit the drafts for public comment.
- Many comments contain personal or non-public information and will require redaction of that personal information prior to publishing any comments. Please, when commenting, do not insert any personal information into the comment. Your name and email address are not part of the actual comment.



## Review Previous/Current Comments/Questions

Comments received from 8/8 to 8/30 –

Category of Comment	No. of Comments
Licensing Processing, Licensing requirements, Board or Program Requirements, or Workforce Development (getting more workers)	13
Governance – Board administration to Program Administration	9
Licensing Reciprocity, Endorsement or Mobility	5
Licensing renewal frequency – longer renewal periods	4
Delicensing license types	3
Licensing Compacts	3
License Scope of Practice or Title Protection for licensees	2
Licensing Continuing Education	2
Combining License Types or Boards or Board Representation	2
Other – Billing of Services once licensed, Elimination of all license fees, Moving of a license type to another agency, Regarding the listening/education sessions, Required Insurance Issues, Disciplinary Case Issues, and “No Changes” comment	7
<b>Total Comments</b>	<b>50</b>



## Review Previous/Current Comments/Questions

Comments received from 8/31 to 9/18 –

Category of Comment	No. of Comments
Licensing Processing, Licensing requirements, Board or Program Requirements, or Workforce Development (getting more workers)	12
Governance – Board administration to Program Administration	5
Licensing Continuing Education	4
Licensing Reciprocity, Endorsement or Mobility	3
Licensing renewal frequency – longer renewal periods	2
Required Insurance Issues	2
Regarding the listening/education sessions	2
License Scope of Practice or Title Protection for licensees	2
Out of Scope for Licensing	2
Other – Elimination of all license fees, Combining of Boards, and Delicensing license types	3
<b>Total Comments</b>	<b>37</b>



## Review Previous/Current Comments/Questions

Comments received from 9/19 to 9/28 –

Category of Comment	No. of Comments
Licensing Processing, Licensing requirements, Board or Program Requirements, or Workforce Development (getting more workers)	14
Board Appointments or Term Limits	6 1/2
Governance – Board administration to Program Administration	4
License Scope of Practice or Title Protection for licensees	4
Out of Scope for Licensing	3
Combining of Boards or licensing types	3
Licensing Reciprocity, Endorsement or Mobility	2
Regarding the listening/education sessions	2
Disciplinary Issues	2
Certification in lieu of Licensing	2
Other – Longer renewal periods, Compacts (1/2), Scope of Practice, Delicensing, Military Spouses, and Lack of Fingerprint/Background checks	5 1/2
<b>Total Comments</b>	<b>48</b>



## Review Previous/Current Comments/Questions

Final Thoughts on Comments....

- Do Not provide Personal Information with your comment
- Please state which draft you are commenting on, which section, then your comment as brief and concise as possible.
- The agency welcomes all comments about anything we are responsible for, but this comment process is designed to cultivate comments specific to the proposed drafts.
- Please do not wait for an education/information session to comment – we are trying to get as many comments as we can early so draft revisions can be made.



## Review Previous/Current Comments/Questions

Final Thoughts on Comments.....

- Steady number of comments.
- Comment focus shifted once drafts dropped.
- Some commenter's concerns may be a bit misdirected.
- Board's Mission: "Set and enforce standards for licensure and carry out disciplinary actions against licensees in support of public safety and welfare"



## Board or Program Administration

Several initial comments received asked specifically about the difference between:

Board Administration of licenses or  
Program Administration of licenses.



## Board or Program Administration

Board or Program Administration

### Currently:

The agency has both board and program administration of licenses – 32 boards and 6 licensing programs.

**16%** of all licensing is currently done through program administration rather than board administration.



## Board or Program Administration

**BOARDS = SUBJECT MATTER EXPERTISE**  
**BOARDS = LICENSEES WHO SERVE**  
**LICENSEES = SUBJECT MATTER EXPERTS**  
**Both administration methods needs licensees to provide that expertise!!**



## Board or Program Administration

Each of these administration methods (Board and Program):

End with a full active license being issued (LICENSED)

**Myth #1 – Programs don't issue licenses**

Has a complete complaint process protecting the public

**Myth #2 – Programs don't have a complaint process**

Utilizes SME (licensees) to derive policymaking

**Myth #3 – Policymaking for Programs is only done by the Agency**



## Board or Program Administration

Each of these administration methods (Board and Program):

Has Statutory and Administrative Rule Requirements

**Myth #4 – Programs have no statutory/rule foundation**

Stipulates title protection for licensees

**Myth #5 – Programs do not offer title protection**



## Board or Program Administration

Contrasts:

Decision Making Faster w/ Program – BM freq./Consensus  
Stakeholder Outreach more active with Program – Advisory  
Boards are more expensive to operate – charged to licensee  
Programs allow for larger participation from licensee pool



## Board or Program Administration

Contrasts:

Rulemaking is less frequent, less costly, less complicated –  
**44.5** Pages (Boards) vs. **10.7** pages (Programs)(Avg.)  
Complaint processing is faster w/ Programs – same process  
Non-Routine Applications are processed faster in Programs  
Programs offer licensees/SH direct access to policymaking



## Board or Program Administration

Final Thoughts on Board and Program Administration.....

- We have and will continue to have 2 methods of licensing administration – Board and Program administration.
- Both require subject matter expertise from licensees which we have presently available through boards or advisory through outreach.
- Not all present boards should be run under program administration, BUT, some present boards would function better and easier as programs for the reasons we have reviewed today.



## Board or Program Administration

### Final Thoughts on Board and Program Administration.....

- The agency is exploring ways to optimize the administration of licenses across all licensing which includes an analysis whether some boards can be better administered as a program and whether any programs require transitioning to a board.
- Our preliminary reviews in connection with the Red Tape Reduction Initiative also revealed some license types that have either NO active licensees anymore or dwindling numbers such that cannot sustain the more expensive board administration platform.



## Question and Answer

- You will use the Q&A tab on your screen to ask your question.
- If you want to post a **comment** on one of the drafts, please do so on the website under the “Comment Submissions” tab and not here.



## Question and Answer

- We will focus on questions that are on topic with these sessions, the drafts, or the process. Questions that are off topic will be answered as time permits but more likely after the session in the next few days.
- Kelsey may also answer some questions that are of a general nature by typing back to the individual as I am organizing questions to answer live.



## Question and Answer

- When posting a question here today, please do so as brief as possible as we will not have time to read and respond to questions with long commentaries.
- We will archive all questions and if not answered today live we will provide an answer in the next few days as long as you have not logged in or asked your question anonymously. We don't get contact info from anonymous registrants so there's no way to contact you back.



## Question and Answer

- You can also email us any questions and we will answer those as quickly as possible. The next slide has the email address that will remain active until the end of the year.
- Please be advised any **comments** or **emails** received in this outreach process are public information so please refrain from providing personal information as that will require redacting before being published in our final report.



## Question and Answer

[dlibsdcomms@mt.gov](mailto:dlibsdcomms@mt.gov) (Email Questions)  
<https://boards.bsd.dli.mt.gov/educational-sessions>  
(Website URL)



## Next Steps.....

- Department continues to explore ideas and concepts within the stated theme of modernizing licensing laws to craft additional proposed legislative drafts.
- Department continues to revise/update current drafts based on the comments received in support of Red Tape Reduction Initiative.
- Department will continue to post updated information to the new website for review by interested parties to gain feedback.



## Next Steps.....

- Next Listening Session Meeting (October 17<sup>th</sup> – 12:30PM to 3:00PM) will be a live session at the Delta Hotel in Helena
- Limited presentation – Focus on Receiving Comments
- Review the drafts and detail out your opinion
- All comments will be archived, used to drive revisions, and published in our final report (summary).
- Depending the number of folks attending we may limit time for comments so we can hear from the maximum number in the time we have. So come prepared and be as brief as necessary to make your comment known.



## Contact:

For more information or to submit a solution or comment please visit:

<https://boards.bsd.dli.mt.gov/educational-sessions>

Or Any Licensing Board or Program Website

[DLIBSDCOMMS@Mt.Gov](mailto:DLIBSDCOMMS@Mt.Gov) (Email Questions)





Montana Department of  
**LABOR & INDUSTRY**

LEGISLATIVE  
LISTENING SESSIONS



Montana Department of  
**LABOR & INDUSTRY**

PROFESSIONAL AND  
OCCUPATIONAL LICENSING



Montana Department of  
**LABOR & INDUSTRY**

HEALTHCARE  
LICENSING

## Modernizing Licensing Laws

### Purpose of these sessions:

- o To provide an outlet for informing and educating the public and professional and healthcare licensees on what explorations the department is undertaking in support of the Governor's Red Tape Reduction Initiative.
- o To provide an opportunity for the public and licensees to provide feedback to various issues, concepts, and proposals that the department's exploratory efforts yields in support of the Red Tape Reduction Initiative.



## Modernizing Licensing Laws

### Agenda for Today:

1. Overview of Newest Draft Documents on Website
2. Discuss Revision Process of All Drafts
3. Title 37 Reform Summary
4. Discuss How Title 37 Reform Preserves Title Protection
5. Receive Your Comments
6. Next Steps.....



## Review Website Information/Layout

<https://boards.bsd.dli.mt.gov/educational-sessions>

### Information on:

- o Listening Sessions
- o Draft Documents or concepts to Review.
- o Educational Materials, summaries of drafts, etc.
- o Comment Submissions\*\*\*



## Revision Process of Draft Documents

### Baseline Facts:

- o The Department is All-In on the Governor's Red Tape Reduction Initiative
- o Professional Licensing needs to be modernized, more agile, and have mobility
- o Red Tape Reduction and Modernizing Licensing = CHANGE
- o Licensing Statutes have become "customized" ILO "Standardized"
- o Individual Perspective into licensing hampers change therefore improvement
- o Operational efficiency now depends on Legislative changes/improvements
- o Public Safety Mission has not diminished



## Revision Process of Draft Documents

- o Proposals and revisions are done by the department's legal team
- o Revisions are Comment Driven – No comments – No Revisions
- o When evaluating comments, things to consider – whether:
  - o The comment is proposal-specific or general in nature
  - o The comment is a detriment or a harm to public safety
  - o The comment is concluding something that is false or true
  - o The comment offers a better solution or is better aligned with the proposal language



## Title 37 Reform Draft – Summary

- o Overview of the first 38 sections - Title 37 Reform Draft
- o Purpose: Summarize what the intent of each section is
- o Landscape: 6 New Sections (1-6) – 32 revised sections
- o Covers just Title 37, Chapter 1 – General Provisions
- o Drafting Process – Interlined, Underlined, No change
- o Review of NEW sections (1-6)



## Preservation of Title Protection

- Number 1 comment so far – “Why are you removing this?”
- That’s why I’m explaining this important process
- Title Protection - means the use of a professional title is restricted to only those individuals who meet the specific qualifications and criteria as determined by a professional governing body. – Holly Arroyo (Article on licensing Social Workers).



## Preservation of Title Protection

- **Current Process** – 32 boards and 6 programs defined and stated or didn’t state various aspects, terminology, or some nomenclature regarding titles or rights to professional standing within their individual statutes – this is what you see interlined or crossed out in your board or program statute in the Title 37 draft.
- **37-26-401. ~~Naturopathic physician license required — titles restricted — enjoining unlawful practice. (1) Except as provided in 37-26-302, a An individual person may not practice naturopathy without a valid and current license issued by the board as provided in unless licensed under this chapter and Title 37, chapter 1.~~**



## Preservation of Title Protection

- **Proposed Process** – An individual may not practice as a (Blank) unless licensed under this chapter and Title 37, chapter 1. (Standardized)
- (1) To obtain a **license** or an endorsement on a license to **practice** a profession or occupation a person shall apply on a form and pay a fee prescribed by the department. (New Section 1 – Title 37, Chapter 1)
- (8) “License” or “licensed” means permission granted to a person under a chapter of this title to engage in or practice or **use a protected title in this state at a specific level in a profession or occupation during times when the license is in active status**, regardless of the specific term used for the permission, including, but not limited to permit, certificate, endorsement, recognition, (Section 15 (8) Title 37, Chapter 1)



## Preservation of Title Protection

- (10) “Practice” means to engage in, hold out, represent, or offer to provide services defined by a scope of practice of a profession or occupation regulated by a board or program under Title 37 **and to use one or more terms, words, initials, insignia, designations, or abbreviations to imply the person holds a license to practice the profession or occupation** or operate a firm or facility regulated by a board or program under Title 37. (Section 15 (10) Title 37, Chap.1)



## Comment Solicitation

- As Always Comments are key to this draft revision process
- You can submit written comments today or verbal – your choice.
- Comment process is public comment therefore what you say and what you submit is public information
- Do not provide any personal information
- We ask that you be as brief as possible so that others will have a chance
- This period is for comments – If you have a question, please submit your question in writing to us or email it to [DLIBSDCOMMS@Mt.Gov](mailto:DLIBSDCOMMS@Mt.Gov)



## Comment Solicitation - Process

- **Step up to the podium**
- **Give us your name and any affiliation you wish to share (licensee, executive director, member of the public, etc.)**
- **Give us your comment – be as brief and concise as possible and let us know which draft you are commenting on and which specific section or page if applicable to your comment.**



## Comments Solicitation

### Final Thoughts on Comments.....

- If you want to add a comment later go to the website and submit it there – Address on last slide
- Remember questions can be emailed to us at the address given – Address on last slide also
- Keep watching website for additional drafts and/or revisions to drafts so you can comment



## Next Steps.....

- Department continues to:
- Explore ideas and concepts within the stated theme of modernizing licensing laws to craft additional proposed legislative drafts.
- Revise/update current drafts based on the comments received in support of Red Tape Reduction Initiative.
- To post updated information to the new website for review by interested parties to gain feedback.



## Next Steps.....

- Next Listening Session Meeting:
- November 10th
- 10:00AM to 12:00PM
- Via Zoom
- Email notice will go out



## Contact:

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For more information or to submit a solution or comment  
please visit:

<https://boards.bsd.dli.mt.gov/educational-sessions>

Or Any Licensing Board or Program Website

[DLIBSDCOMMS@Mt.Gov](mailto:DLIBSDCOMMS@Mt.Gov) (Email Questions)



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## Modernizing Licensing Laws

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- o To provide an opportunity for the public and licensees to provide feedback to various issues, concepts, and proposals that the department's exploratory efforts yields in support of the Red Tape Reduction Initiative.



## Modernizing Licensing Laws

### Agenda for Today:

1. Review Website "Drafts" & "Educational Materials" - Status
2. Review Current Comments
3. Title Protection Review - What is it and how it is maintained and reinforced
4. Review Licensing Mission - What is it and what is it not
5. Review - Board vs. Program Administration - it's a method change
6. What happens if a license type is no longer a license type?
7. Cultivation of Subject Matter Expertise (SME) and Why?
8. **Q** and **A** Opportunity
9. Next Steps (Final Steps)...



## Review Website

<https://boards.bsd.dli.mt.gov/educational-sessions>

### Information on:

- o **Listening Sessions**
- o **Draft Documents or concepts to Review.**
- o **Educational Materials, summaries of drafts, etc.**
- o **Comment Submissions\*\*\***



## Overview of New Draft Documents

### Proposed "Drafts for Public Comment" (To Date)

- o Version 4 - "Title 37 Reform" (Leaving 11/18)
- o Version 2 - "Property Managers/Timeshare Changes"
- o Version 1 - "Repeal of Medication Aides"
- o Version 1 - "Athletic Trainers - Board to Program"
- o Version 1 - "Clinical Lab Science - Board to Program"
- o Version 1 - "Sanitarians - Board to Program"
- o Version 2 - "Hearing Aid Dispensers - Board to Program"
- o Version 1 - "Private Security - Board to Program"
- o Version 1 - "Medical Board Changes"



## Overview of New Educational Materials

### Supporting Documents

- o **NEW** - Realty Regulation Changes
- o **NEW** - Boards to Programs (Athletic Trainers, Clinical Laboratory Science Practitioners, Sanitarians)
- o **NEW** - Board to Programs (Hearing Aid Dispensers)
- o **NEW** - Boards to Programs (Medical Examiners)
- o **NEW** - Boards to Programs (Private Security)
- o **NEW** - Program Subject Matter Expertise Cultivation Procedure



## Review Posting History

Website went live - 8/8/2022

First New Drafts Posted to site - 9/19/2022

Second New Drafts Posted to site - 10/31/2022

Third New Drafts Posted to site - 11/3/2022 & 11/9/22

To date: After 3 sessions and a total of **1,514,653** emails sent inviting folks to comment - **638** Comments have been received.

**The department does NOT anticipate any additional new drafts to be approved/submitted to the site. What we have posted now and had posted before is it.**



**Proposed "Drafts for Public Comment" (Final List) – 12 Drafts**

- "Title 37 Reform"
- "Board Consistency"
- "Licensing Enforcement"
- "Medication Aides"
- "Board of Behavioral Health Consolidation"
- "Athletic Trainers – Board to Program"
- "Sanitarians – Board to Program"
- "Clinical Lab Science – Board to Program"
- "Hearing Aid Dispensers – Board to Program"
- "Private Security – Board to Program"
- "Medical Board Changes"
- "Property Managers/Timeshare Changes"

Review Comments

**638** total comments received through website/email since it went live on 8/8/2022.

Of that total (**638**) – **87** were received before any drafts were posted leaving **551** received after drafts were posted.

Of the **551** received since drafts posted **188** of those **551** were received before the Boards to Programs drafts were posted so that leaves **363** comments received since the boards to programs drafts were posted.

Review Comments

General Notes....

- Every comment is being archived, analyzed for the nature of the comment and for which draft it belongs to or whether it is a general comment (Non-draft specific). All comments will be published in our final report.
- Each comment received regarding a draft is shared with the Red Tape Reduction team in the division for consideration to develop and further edit the drafts for public comment. Comment period is closing soon.



Review Comments

Final Thoughts on Comments.....

- Please state which draft you are commenting on, which section, then your comment as brief and concise as possible – giving us the "what" and the "why". Again, some comment period is closing.
- The agency welcomes all comments about anything we are responsible for, but this comment process is designed to cultivate comments specific to the proposed drafts.
- NOT ALL COMMENTS WILL MAKE IT TO A REVISIONS OR MORE IMPORTANTLY SOME REVISIONS MAY NOT LOOK LIKE YOUR COMMENT BUT DO THE SAME THING.

Preservation of Title Protection

- Still a high number of comments – "Why are you removing this?"
- That's why I'm explaining this important process
- Title Protection - means the use of a professional title is restricted to only those individuals who meet the specific qualifications and criteria as determined by a professional governing body. – Holly Arroyo (Article on licensing Social Workers).

Preservation of Title Protection

- Current Process – 32 boards and 6 programs defined and stated or didn't state various aspects, terminology, or some nomenclature regarding titles or rights to professional standing within their individual statutes – this is what you see interlined or crossed out in your board or program statute in the Title 37 draft.



Preservation of Title Protection

"37-65-301. License Architect license required. An individual Except as provided in this chapter, a person may not practice architecture in this state or use the title "architect" or "licensed architect" or any words, letters, figures, or other device indicating or intending to imply that the person is an architect, without having qualified unless licensed under this chapter and Title 37, chapter 1."

Preservation of Title Protection

"37-4-402. Dental hygienist ~~License license required~~ - ~~examination qualifications for licensure.~~ (1) ~~The department may issue licenses for the practice of dental hygiene to qualified applicants to be known as dental hygienists~~ An individual may not practice dental hygiene unless licensed under this chapter and Title 37, chapter 1.

Preservation of Title Protection

"37-26-401. Naturopathic physician license required — ~~titles restricted~~ ~~enjoining unlawful practice.~~ (1) ~~Except as provided in 37-26-302, a~~ An individual person may not practice naturopathy without a valid and current license issued by the board as provided in unless licensed under this chapter and Title 37, chapter 1.



## Preservation of Title Protection

~~"37-69-301. License Plumber license required. (1) Except as provided in 37-69-102, a An individual person working at may not practice the field of plumbing in this state, either as a master plumber or as a journeyman journey level plumber, shall first obtain a license as provided in unless licensed under this chapter and Title 37, chapter 69, part 31.~~

## Preservation of Title Protection

- **Proposed Process** – An individual may not practice as a (Blank) unless licensed under this chapter and Title 37, chapter 1. (Standardized)
- (1) To obtain a license or an endorsement on a license to practice a profession or occupation a person shall apply on a form and pay a fee prescribed by the department. (New Section 1 – Title 37, Chapter 1)
- (8) "License" or "licensed" means permission granted to a person under a chapter of this title to engage in or practice or use a protected title in this state at a specific level in a profession or occupation during times when the license is in active status, regardless of the specific term used for the permission, including, but not limited to permit, certificate, endorsement, recognition, (Section 15 (8) Title 37, Chapter 1)

## Preservation of Title Protection

- (10) "Practice" means to engage in, hold out, represent, or offer to provide services defined by a scope of practice of a profession or occupation regulated by a board or program under Title 37 and to use one or more terms, words, initials, insignia, designations, or abbreviations to imply the person holds a license to practice the profession or occupation or operate a firm or facility regulated by a board or program under Title 37. (Section 15 (10) Title 37, Chap.1)

## Board and Department Mission (Purpose)

- **Board's/Department's Purpose:**
- "Set and enforce standards for licensure and carry out disciplinary actions against licensees in support of public safety and welfare"

## Board and Department Mission (Purpose)

- Board's Mission: "Set and enforce standards for licensure and carry out disciplinary actions against licensees in support of public safety and welfare"
- "What" vs. "How" for Standards and Standardization
  - NOT the same – "What" is individualized, How is standardized
  - One is a subject in these proposals, and one is NOT

## Board and Department Mission (Purpose)

SO, the question is:  
How to express that "Purpose" for ALL license types and professions equitably and collectively while not having it diminished or confused by any alternative statement or language?

## Board and Department Mission (Purpose)

Current "Purpose" Statement Landscape:  
50 professions are outlined in statute (MCA)  
31 of those have Purpose Statements (62%)  
19 of those have NO Purpose Statement (38%)  
The Proposal standardizes the purpose statement in line with the department and board core purpose

## Board and Department Mission

"37-1-301. Purpose – legislative finding. (1) The purpose of this chapter is to establish uniform procedures and principles to regulate persons, in or out of this state, who engage in professions and occupations under the jurisdiction of professional and occupational licensing boards and programs attached to the department in Title 37.

## Board and Department Mission

(2) The practice of the professions and occupations under the jurisdiction of professional and occupational licensing boards and programs attached to the department in Title 37 affect the public health, safety, and welfare and are subject to regulation and control in the public interest."

## Board or Program Administration

Board Administration of licenses OR  
Program Administration of licenses.

“It’s a matter of Method”



## Board or Program Administration

Board or Program Administration

**Currently:**

The agency has both board and program administration of licenses – 32 boards and 6 licensing programs.

**16%** of all licensing is currently done through program administration rather than board administration.



## Board or Program Administration

**BOARDS = SUBJECT MATTER EXPERTISE**  
**BOARDS = LICENSEES WHO SERVE**  
**LICENSEES = SUBJECT MATTER EXPERTS**

**Both administration methods needs licensees to provide that expertise!!**



## Board or Program Administration

**Each** of these administration methods (Board and Program):

End with a full active license being issued (LICENSED)

**Myth #1 – Programs don’t issue licenses**

Has a complete complaint process protecting the public

**Myth #2 – Programs don’t have a complaint process**

Utilizes SME (licensees) to derive policymaking

**Myth #3 – Policymaking for Programs is only done by the Agency**



## Board or Program Administration

**Each** of these administration methods (Board and Program):

Has Statutory and Administrative Rule Requirements

**Myth #4 – Programs have no statutory/rule foundation**

Stipulates title protection for licensees

**Myth #5 – Programs do not offer title protection**



## Board or Program Administration

Contrasts:

Decision Making Faster w/ Program – BM freq./Consensus

Stakeholder Outreach more active with Program – Advisory

Boards are more expensive to operate – charged to licensee

Programs allow for larger participation from licensee pool



## Board or Program Administration

Contrasts:

Rulemaking is less frequent, less costly, less complicated –  
**44.5** Pages (Boards) vs. **10.7** pages (Programs)(Avg.)

Complaint processing is faster w/ Programs – same process

Non-Routine Applications are processed faster in Programs

Programs offer licensees/SH direct access to policymaking



## Board or Program Administration

Factors or Characteristics **favorable** for Program Administration:

- Low number of Non-routine applications
- Low number of Complaints
- Low numbers of yearly applications/Licensees
- Minor Representation on Board (intra-board and external)
- Active Association/Stakeholders
- National Certifying Body or Credentialing Body
- Fiscal Situation (Board costs vs. Program costs/# Licensees)
- Low licensing diversity and low analysis



## Board or Program Administration

Final Thoughts on Board and Program Administration.....

- We have and will continue to have 2 **methods** of licensing administration – Board and Program administration.
- Both require subject matter expertise from licensees which we have presently available through boards or advisory through outreach.
- Not all present boards should be run under program administration, BUT, some present boards would function better and easier as programs for the reasons we have reviewed today.



## Delicensing – What Happens?

Part of the analysis in the Red Tape Reduction Initiative was a review of what licenses no longer served the purpose of public safety.

As we found other outdated language and changes to methods, we discovered a small group of **licenses** that for a variety of reasons no longer needed to be licenses.

## Delicensing – What Happens?

Proposed – By the Numbers....	Current Active Licensees
◦ Private Security – Resident Manager	154
◦ Nursing – Medication Aid II	143
◦ Private Security – Process Servers	125
◦ Realty Regulation – Timeshare Offering	47
◦ Nursing – Medication Aid I	23
◦ Private Security – Branch Office	10
◦ Realty Regulation – Timeshare Salesperson/Broker	9
◦ Private Security – Alarm Response Runner	0
	<b>511 Total</b>

## Delicensing – What Happens?

**125,184** Active Professional, Occupational, and Healthcare licensees in Montana.

**511** Delicensed (Proposed) or 0.40% of Total Licensees

3 Boards total proposed to lose Licenses – 29 boards to lose no licenses.

## Delicensing – What Happens?

Delicensing does **NOT** mean:

You lose your profession – if you worked as a process server or medication aid (for example) today, you work at it tomorrow. Nobody is outlawing your profession!

You just DON'T need to stop by the government and buy a license – go to work!

### Cultivation of Subject Matter Expertise (SME) and Why?

- **Why First:**
  - To gain insight on how the department and boards are doing
  - To solicit comments on Administrative Rule processes
  - To guide the department in crafting policy for program licensing
  - Serve as Expert Witnesses in various matters (mostly Legal)
  - Seek input/feedback about specific legislative proposals – like this
  - To Serve on Executive Branch Licensing Boards

### Cultivation of Subject Matter Expertise (SME) and Why?

- **Cultivation of Subject Matter Expertise**
  - Needs to be procedure-based and as such follow specific steps
  - Needs to be thorough and complete before wrapping up
  - Needs to seek out divergent opinions for a complete discussion
  - Needs to be deliverable-based with a tangible outcome/product
  - Needs to be documented and archived for transparency and continuity
  - Needs to honor the core purpose of the boards and department

### Cultivation of Subject Matter Expertise (SME) and Why?

#### I. PURPOSE

Administration of licensing programs requires subject matter expertise (SME) from licensees and other stakeholders. SME plays a vital role in aligning opinions, information, and advice from licensees and other stakeholders with that of program administration policymaking. The level of SME utilized should fit the program administration need. The process is a collaborative approach with the department and stakeholders. Coordination under this procedure is separate from both the SME obtained as public comments during formal rulemaking actions and distinct from any cultivation or contracting of expert witnesses as part of an alternative process.

### Cultivation of Subject Matter Expertise (SME) and Why?

#### II. APPLICABILITY

The following procedures shall apply to the cultivation, documentation, and retention of SME in connection with policymaking for licensing programs administered through the division. All licensing programs will utilize this procedure in connection with program policymaking. There is no set frequency for, or quantity of, cultivation of SME as it will depend on the complexity of the issue(s) presented.

### Cultivation of Subject Matter Expertise (SME) and Why?

#### III. RESPONSIBILITIES

The Professional Licensing Bureau Chief will ensure that staff members comply with this procedure. IT staff will create secure, permanent storage locations for electronic audio and word processing files. Supervisors will create checklists to assist staff in implementing this procedure. Staff will direct questions regarding this procedure to their immediate supervisors.

## Cultivation of Subject Matter Expertise (SME) and Why?

Final Thoughts....2 comments from earlier slides:

### LICENSEES = SUBJECT MATTER EXPERTS

Subject matter expertise from licensees which we have presently available through boards or advisory through procedure-based outreach.



## Question and Answer

- You will use the Q&A tab on your screen to ask your question.
- Kelsey may also answer some questions that are of a general nature by typing back to the individual as I am organizing questions to answer live.



## Question and Answer

- You can also email us any questions and we will answer those as quickly as possible. The next slide has the email address that will remain active until the end of the year.
- Please be advised any comments or emails received in this outreach process are public information so please refrain from providing personal information as that will require redacting before being published in our final report.



## Question and Answer

[dlibsdcmsgs@mt.gov](mailto:dlibsdcmsgs@mt.gov) (Email Questions)

<https://boards.bsd.dli.mt.gov/educational-sessions>

(Website URL)



## Next Steps.....

- Department is **NOT** crafting any additional proposed legislative drafts. As mentioned earlier, we are complete at 12 proposals.
- Department continues to revise/update current drafts based on the comments received in support of Red Tape Reduction Initiative.



## Next Steps.....

- Last Listening Session Meeting (December 15<sup>th</sup> – 10:00AM to Noon – Zoom Meeting)
- All comments will be archived, used to drive revisions, and published in our final report (summary).



## Contact:

For more information or to submit a solution or comment please visit:

<https://boards.bsd.dli.mt.gov/educational-sessions>

Or Any Licensing Board or Program Website

[DLIBSDCOMMS@Mt.Gov](mailto:DLIBSDCOMMS@Mt.Gov) (Email Questions)





## Modernizing Licensing Laws

### Agenda for Today:

1. Review Website – Status
2. Latest Bills and Revisions
3. Review Comments
4. Draft Summary Review
5. Final Report Timeline
6. Final Steps....

## Review Website

<https://boards.bsd.dli.mt.gov/educational-sessions>

### Information on:

- o Info on the Stakeholder Sessions
- o Educational Materials, summaries of drafts, etc.
- o Draft Documents or concepts to Review.
- o Final Legislative Drafts

## Review Posting History

Website went live – 8/8/2022

First New Drafts Posted to site – 9/19/2022

Second New Drafts Posted to site – 10/31/2022

Third New Drafts Posted to site – 11/3/2022 & 11/9/22, 11/30/22, 12/1/22, and 12/6/22, etc.....

To date: After 4 sessions and a total of **1,730,056** emails sent inviting folks to comment - **748** Comments have been received.



### Proposed “Drafts for Public Comment” (Final List) – 12 Drafts

- “Title 37 Reform” – LC 396\*
- “Board Consistency” – LC 394 HB 87
- “Licensing Enforcement” – LC 395 HB 115
- “Medication Aides” – LC 401\*
- “Board of Behavioral Health Consolidation” – LC 393\*
- “Athletic Trainers – Board to Program” – LC 2176
- “Sanitariums – Board to Program” – LC 2178
- “Clinical Lab Science – Board to Program” – LC 2177
- “Hearing Aid Dispensers – Board to Program” – LC 2181
- “Private Security – Board to Program” – LC 2182
- “Medical Board Changes” – LC 2179
- “Property Managers/Timeshare Changes” – LC 2180

### Proposed “Drafts for Public Comment” (Final List)

- “Title 37 Reform” – LC 396 **V5**
- “Board Consistency” – LC 394 HB 87 **V3**
- “Lic. Enforcement” – LC 395 HB 115 **V4**

### Proposed “Drafts for Public Comment” (Final List)

- “Medication Aides” – LC 401 **V2**
- “Board of Behavioral Health Consolidation” – LC 393 **V2**

**Proposed “Drafts for Public Comment” (Final List)**

- “Athletic Trainers – Board to Program” – LC 2176 V2
- “Sanitarians – Board to Program” – LC 2178 V2
- “Clinical Lab Science – Board to Program” – LC 2177 V2
- “Hearing Aid Dispensers – Board to Program” – LC 2181 V2
- “Private Security – Board to Program” – LC 2182 V3
- “Medical Board Changes” – LC 2179 V4
- “Property Managers/Timeshare Changes” – LC 2180 V3

**Review Comments**

748 total comments received through website/email since it went live on 8/8/2022.

Since last meeting we have broken down the comments by license type or issue involved and we have 15 categories.

**Review Comments**

- Title 37 Reform Comments
- Board Consistency Comments
- Licensing Enforcement Comments
- Behavioral Health Chapter Consolidation Comments
- Medication Aids Delicensing Comments
- Athletic Trainer Comments
- Sanitarian Comments
- Clinical Laboratory Science Comments
- Nutritionists Comments
- ECPs Comments (EMT, Paramedics, etc.)
- Private Security/Process Servers Comments
- Realty Regulation/Property Managers Comments
- Public Accountant Comments
- Architect/Landscape Architects Comments
- Massage Therapists Comments



**Review Comments**

**Final Thoughts on Comments.....**

- Comments drove version updates as you could see from the version changes noted on the earlier slides
- The department appreciated all comments and everyone's participation as it was significant to making appropriate version updates
- Quality of comments won out over quantity as they should, but we still appreciate everyone's efforts in getting their comment in
- As we approach the session, we are preparing the comments for publishing in our final report.

**Summary of Issues**

- Quick run-through of the main issues we discussed in the previous presentations:
  - Three Reform Bills – work together
  - Title Protection – Moved but NOT Gone
  - Board to Program/Method change - Subject Matter Expertise (SME)
  - Delicensing – Very Limited and NO loss of Profession/Work
  - Purpose Statements/Department and Boards Mission

**Summary of Issues**

- 3 Main Reform Bills - Facts:
  - Title 37 Reform, Board Consistency, and Licensing Enforcement
  - They all complement each other – there are changes in all to accomplish necessary changes in others - examples
  - These bills are meant to reinforce a “collective” or “umbrella” approach to licensing so that standardization can be achieved
  - When professions add customized language, processes, or requirements it foils that standardization and weakens umbrella



**Summary of Issues**

- Title Protection - Facts:
  - Yes, language is struck in individual statutes – that's ½ the story
  - Language is re-inserted and reinforced in the front sections
  - By tying title protection to the act of licensing and defining practicing allows professions through boards or programs to definitively define what titles are allowed in rules.
  - Bottom line – Title protection is not lost but reinforced!

**Summary of Issues**

- Board to Program – Facts:
  - It's a method – administration changes from board to program
  - Still REMAIN licensed!
  - Requirements for license, scope of practice and unprofessional conduct remain in statute and/or rule
  - SME – found the same place as found for boards – Licensees
  - Complaint process (prosecution/adjudication) – same

**Summary of Issues**

- Delicensing – Facts:
  - Very limited amount of delicensing – 386 licenses (0.30%)
  - Delicensing does NOT mean elimination of job or profession
  - 7 License types being eliminated – 2 from realty, 2 from nursing, and 3 from private security. 2 of these 7 are not people but facilities and 1 of the 7 has no current active licensees
  - **Process Servers are no longer proposed for delicensing**



## Summary of Issues

### ◦ Purpose Statements – Facts:

- 50 professions licensed - 31 had purpose statements, 19 have no purpose statement - none
- Purpose of licensing – protect the public health, safety, and welfare in the interest of the public – period!
- All purpose statements are being removed from individual statutes and moved to provide a singular purpose for all licensing – sets the table for licensing enforcement.



## Final Report

- The deliverable from this project is a final report on our outreach efforts
- The department will pull together the report in the next 2-3 weeks
- The report will be posted on the website for review
- The report will include the comments received from stakeholders and licensees



## Next Steps.....

- **Department is NOT crafting any additional proposed legislative drafts. As mentioned earlier, we are complete at 12 proposals.**
- **As the session approaches, the Department is wrapping up it's educational, informational, and comment solicitation process. The website will remain in place for now.**



## Next Steps.....

- **Our Proposed Drafts not already finished drafting from legislative services will continue moving over to legislative services to finish the final drafts as bills ready to go. Some are done now.**
- **The department will begin the process of supporting our bills by providing legislators with supporting documentation and other necessary information like fiscal notes, bill summaries, etc.**



## Next Steps.....

- **FYI - Department is tracking a number of other licensing bills and draft placeholders that are not our bills, but we will no doubt weigh in on those throughout the session.**
- **All comments will be archived and published in our final report (summary).**



## Contact:

For more information or to submit a solution or comment please visit:

<https://boards.bsd.dli.mt.gov/educational-sessions>

Or Any Licensing Board or Program Website

[DLIBSDCOMMS@Mt.Gov](mailto:DLIBSDCOMMS@Mt.Gov) (Email Questions)





# STAKEHOLDER MEETINGS

	Stakeholder	Date Met	Time Met	Representative
1	Architects and Accountants	8/1/2022	3:00PM	Allen Lloyd
2	Economic Affairs Interim Committee Meeting	9/13/2022	10:45AM	Chair Bogner
3	Department of Defense Liaison Office	9/22/2022	2:00PM	Tammie Perrault
4	Montana Academy of Nutrition and Dietetics	10/14/2022	9:00AM	Patti Steinmuller
5	State Workforce Investment Board (SWIB)	10/19/2022	11:00AM	Wes Feist
6	Naturopathic Physician – Dr. Bonville	10/27/2022	8:30AM	Dr. Alisun Bonville
7	Montana Academy of Nutrition and Dietetics	11/3/2022	12:30PM	Patti Steinmuller
8	Montana American Institute of Architects (MAIA)	11/10/2022	1:00PM	Jennifer James
9	ECP Services Group	11/16/2022	1:00PM	Marc Kilman-Burnham
10	Montana Athletic Trainers Association (MATA)	11/22/2022	2:00PM	J. Paul Capp
11	Montana Nurses Association (MNA)	11/28/2022	10:30AM	Vicky Byrd
12	American Society for Clinical Laboratory Science (ASCLS)	12/2/2022	10:00AM	Cara Bushmaker
13	Montana Society of Certified Public Accountants (MSCPA)	12/7/2022	2:00PM	Allen Lloyd
14	Federation of State Massage Therapy Boards (FSMTB)	12/9/2022	9:00AM	Ashley Hernandez
15	American Massage Therapy Association (AMTA)	12/9/2022	1:00PM	Glory Blue Earth
16	Montana Speech Language Hearing Association (MSHA)	12/12/2022	2:00PM	Robin Turner
17	Associated Bodywork and Massage Professionals (ABMP)	12/13/2022	2:00PM	Laura Embleton
18	National Athletic Trainers Association (NATA)	12/16/2022	10:30AM	Amy Callender
19	Montana Optometry Association (MOA)	12/19/2022	5:30PM	Marti Wangen
20	Montana Health Care Association (MHCA)	12/21/2022	10:00AM	Rose Hughes
21	Montana Environmental Health Association (MEHA)	12/21/2022	11:00AM	Sarah Robbin
22	Process Servers and Levying Agents Meeting	12/29/2022	2:00PM	Roxene Cook



## BILL SUMMARIES

Bill summaries have been included within this report in order to provide a holistic view of the twelve bills the Department has initiated for the 68<sup>th</sup> Legislative Session aligning with Red Tape Reduction. Each summary highlights key reform proposed as well as amendment and repeal sections proposed within Montana Code Annotated (MCA).

# HB 87 - Consistency in Appointments, Qualifications, and Terms for All Boards and Board Members

Representative Bill Mercer, HD 46

- Currently, each licensing board in Montana has independent term limits and qualifications for appointment to their board, leading the Department to govern a patchwork of separate rules and regulations across its 32 boards.
- This legislation standardizes appointment procedures, terms, and qualifications for every board member across all boards and places these requirements and processes into one chapter of code.
- Specifically, the bill standardizes:
  - Appointments:
    - All board members must be appointed by the Governor with consent of the Senate.
    - In the event of an appointment to fill a vacancy that occurs prior to the expiration of a former member's full term, the new member may be confirmed in the next legislative session.
  - Terms:
    - A member may serve two consecutive four-year terms and may not be reappointed within 4 years of the member's second consecutive term.
    - A board chair may serve no more than four consecutive one-year terms.
  - Board member qualifications:
    - Be a resident of Montana and at least 18 years old.
    - Professional members of a board must be currently practicing in the profession or occupation – and have an active license – with the board on which they serve.
    - Public members of a board must not have any material financial interest in the activities regulated by the board on which they serve. They also shall not be – nor shall ever have been – a licensee of the board of which they are appointed.

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Department of Labor & Industry



# HB 115 - Licensing Enforcement

*Representative Bill Mercer, HD 46*

- The bill standardizes cease and desist, injunctive, and criminal actions across all boards and programs.
- Specifically, the bill states:
  - The screening panel of a board or the Department on behalf of any program may assess a penalty of not more than \$1,000 per day for each day of violation of a cease-and-desist order issued by the Department for acting without a license.
  - Following a vote of its screening panel, a board or the Department may institute an action of injunction in district court. A violator of an injunction is guilty of a felony.
- Removes 61 sections of code to bring all enforcement actions under one chapter.

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Department of Labor & Industry

## HB 137 - Board of Behavioral Health Chapter Consolidation

*Representative Greg Oblander, HD 40*

- Under current law, each of the Board of Behavioral Health's covered occupations – social work, professional counseling, marriage and family therapy, addiction counseling, and behavioral health peer support – have separate chapters in MCA.
- The bill brings all of the Board of Behavioral Health's requirements and definitions for their covered occupations under one chapter of code.
- By removing 40 duplicative MCA sections, the bill provides a singular reference point for those trying to understand the requirements and qualifications for all license types under the Board of Behavioral Health.

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## Department of Labor &amp; Industry

**HB 152 - Title 37 Reform***Representative Bill Mercer, HD 46*

Pursuant to Executive Order 1-2021 “Red Tape Reform” the Department of Labor & Industry, Employment Standards Division proposes the following legislation affecting Montana professional and occupational licensing to address “excessive, outdated, unnecessary, or burdensome” regulations. In addition to the reforms detailed below, this bill repeals 274 duplicative sections of code to ensure clear understanding and enforcement of licensing standards across all covered occupations.

**Easing Licensing Restrictions**

- Expands Opportunities for the Military and their Families
  - Authorizes a three-year temporary license to the spouse of an active military member who has an active license in good standing from another jurisdiction.
  - Extends the continuing education and licensing renewal requirements exemption for active-duty military to six months after the completion of active duty.
  - Repeals 35 verbatim rules to simplify the “relevant military training, service, or education” equivalencies for licensing requirements into a single chapter.
- License by Endorsement – Increasing License Mobility for Licensees from Other States
  - Grants the Department the authority – rather than a board – to make substantial equivalency decisions on applicants licensed in another state. The Department will refer to the board only those applications the Department has deemed not substantially equivalent.
  - If the state standards of the predicate license are not substantially equivalent to Montana’s, the Department will present the individual applicant’s qualifications and work experience to the board for the final decision.

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## Department of Labor &amp; Industry

**HB 152, cont.***Representative Bill Mercer, HD 46*

- Creates a “provisional” license to allow licensure pending a fingerprint and background check or verification of additional information provided if the applicant has attested to having no adverse licensure, criminal, employment, or other history.
- Board Specific Changes
  - Chiropractors: Repeals the obsolete Chiropractic Impairment Evaluator Certification – as all chiropractors can perform evaluations for purposes of worker’s compensation.
  - Midwives: Eliminates requirements beyond the standards of the North American Registry of Midwives.

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**Consistency and Clarity**

- Adds the term “program” where “board” is specified in order to enact uniform procedures and principles that apply to all boards and programs.
- Authorizes the Department to set all fees to ensure consistent and transparent fee structures.
- Adopts uniform language as applicable to: defining the scope of practice, the title of the license type that may engage in the practice, title protection, and unprofessional conduct; as well as establishing licensing qualification and standards of practice.
- Removes unnecessary repetition of unprofessional conduct provisions and consolidates those provisions in one chapter to include:
  - Conduct defined as a sexual crime regardless of whether the conduct occurs during or relating to the practice.
  - Conduct that is a violation of the Human Rights Act.
  - Failing to cooperate with an investigation.
  - Violation of federal, state, or local law related to the profession.
- Strikes language from practice acts and administrative rules that do not focus on provisions unique to the profession or occupation.



Department of Labor & Industry

# Athletic Trainers: Board Administration to Program Administration

- Eliminates the Board of Athletic Trainers
  - Keeps full licensure in place with licenses administered through program administration.
  - Empowers the subject matter expertise of the 171 active licensees to inform policy decisions, rather than relying on 4 board members from the profession.
  - Maintains the same disciplinary process to provide protection for the public.
- Amends several sections of MCA while repealing others
  - Amends – 37-1-401, 37-36-101, 37-36-201, and 37-36-202.
  - Repeals – 2-15-1771 and 37-36-102.

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Department of Labor & Industry

## Clinical Lab Science: Board Administration to Program Administration

- Eliminates the Board of Clinical Laboratory Science Practitioners
  - Keeps full licensure in place with licenses administered through program administration.
  - Empowers the subject matter expertise of the 1,057 active licensees to inform policy decisions, rather than relying on 4 board members from the profession.
  - Maintains the same disciplinary process to provide protection for the public.
- Amends several sections of MCA while repealing others
  - Amends – 37-1-401, 37-34-103, 37-34-303, 37-34-305, and 37-34-307.
  - Repeals – 2-15-1753, 37-34-101, 37-34-102, and 37-34-201.

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Department of Labor & Industry

## Hearing Aid Dispensers: Board Administration to Program Administration

- Eliminates the Board of Hearing Aid Dispensers
  - Keeps full licensure in place with licenses administered through program administration.
  - Empowers the subject matter expertise of the 65 active licensees to inform policy decisions, rather than relying on 3 board members from the profession.
  - Maintains the same disciplinary process to provide protection for the public.
- Amends several sections of MCA while repealing others
  - Amends – 37-15-102, 37-16-102, 37-16-202, 37-16-301, 37-16-303, 37-16-304, 37-16-405, 37-16-406, 37-16-408, 37-16-411, and 37-16-413.
  - Repeals – 2-15-1740 and 37-16-201.

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# Medical Board Changes

- **Nutritionists – Board Administration to Program Administration**
  - Moves Nutritionists from the Board of Medical Examiners to a Program
    - Keeps full licensure in place with licenses administered through program administration.
    - Extends the cultivation of subject matter expertise for policymaking from 1 board member in the profession to the entire licensee pool of 600 active licensees.
    - Empowers the subject matter expertise of the 600 active licensees to inform policy decisions, rather than relying on 1 board member from the profession.
    - Maintains the same disciplinary process to provide protection for the public.
  - Amends several sections of MCA
    - Amends – 2-15-1731, 37-3-401, 37-3-203, 37-25-101, 37-25-102, 37-25-201, 37-25-302, and 37-25-308.
- **Emergency Care Providers (EMR, EMT, AEMT, and Paramedic) – Board Administration to Program Administration**
  - Moves Emergency Care Providers from the Board of Medical Examiners to a Program
    - Keeps full licensure in place with licenses administered through program administration.
    - Empowers the subject matter expertise of the 6458 active licensees to inform policy decisions, rather than relying on 1 board member from the profession.
    - Maintains the same disciplinary process to provide protection for the public.
  - Amends several sections of MCA while repealing others
    - Amends – 2-15-1731, 37-3-401, 37-3-203, 50-6-104, 50-6-105, 50-6-202, 50-6-203, and 61-2-502.
    - Repeals – 50-6-201.

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## Medical Board Changes, *cont.*

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- **Acupuncture – Board Administration to Program Administration**
  - Moves Acupuncture from the Board of Medical Examiners to the Alternative Health Care Board
    - Keeps full licensure in place with licenses administered through the Alternative Health Care Board.
    - Extends the representation on the Alternative Health Care Board by two members to allow for equal professional representation of acupuncture.
    - Maintains the same disciplinary process to provide protection for the public.
  - Amends several sections of MCA
    - Amends – 37-1-401, 37-3-102, 37-3-203, and 37-13-103, and 37-13-201.

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Department of Labor & Industry

## Board of Nursing, Medication Aides I and II

- Eliminates the Licensing of Medication Aides
  - Removes license requirement for Medication Aide I
  - Removes license requirement for Medication Aide II
  - Allows present and future (those working towards certification) Medication Aides to work in facilities as now except no longer requires a license.
  - Allows short and long term facilities to still utilize this profession (Medication Aides) as before – no changes except no license required.
- Amends several sections of MCA while repealing others
  - Amends – 37-8-101, 37-8-102, 37-8-202, and 37-8-303.
  - Repeals – 37-8-422, 37-8-423, 37-8-424, 37-8-425, and 37-8-426.

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Department of Labor & Industry

## Private Security: Board Administration to Program Administration

- Eliminates the Board of Private Security
  - Removes some license types and keeps remaining license types with full licensure in place with licenses administered through program administration rather than board administration.
  - Keeps Process Servers licensed (No Delicensing).
  - Empowers the subject matter expertise of the 2,092 active licensees to inform policy decisions, rather than relying on 3 board members from the profession.
  - Maintains the same disciplinary process to provide protection for the public.
- Amends several sections of MCA while repealing others
  - Amends – 37-60-101, 37-60-103, 37-60-104, 37-60-105, 37-60-202, 37-60-301, 37-60-303, 37-60-304, 37-60-310, 37-60-314, 37-60-320, 37-60-404, 37-60-405, and 37-60-407.
  - Repeals – 2-15-1781, 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112, 37-60-201, 37-60-211, 37-60-302 and 37-60-309.

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Department of Labor & Industry

## Board of Realty Regulation, Property Managers: Board Administration to Program Administration

- Eliminates Property Managers from the Board of Realty Regulation
  - Keeps full licensure in place with licenses for Property Managers administered through program administration.
  - Empowers the subject matter expertise of the 1090 active licensees to inform policy decisions, rather than relying on 1 board member from the profession.
  - Maintains the same disciplinary process to provide protection for the public.
- Amends several sections of MCA while repealing others
  - Amends – 2-15-1757, 37-51-102, 37-51-103, 37-51-321, and 37-51-324.
  - Repeals – 37-51-601, 37-51-602, 37-51-603, 37-51-605, 37-51-607, and 37-51-608.

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Department of Labor & Industry

## Sanitarians: Board Administration to Program Administration

- Eliminates the Board of Sanitarians
  - Keeps full licensure in place with licenses administered through program administration.
  - Empowers the subject matter expertise of the 156 active licensees to inform policy decisions, rather than relying on 3 board members from the profession.
  - Maintains the same disciplinary process to provide protection for the public.
- Amends several sections of MCA while repealing others
  - Amends – 37-1-401, 37-40-101, 37-40-302, and 37-40-312.
  - Repeals – 2-15-1751, 37-40-201, 37-40-202, and 37-40-203.

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## COMMENT SUBMISSIONS

A comment submission portal was opened up on August 4<sup>th</sup>, 2022 through the DLI Educational Sessions Webpage. All interested parties were invited to express feedback regarding the Department's legislative bill drafts. The drafts went through a revision process with updated versions as a direct result of comments received on the portal. In-person public comments made at the Delta Hotel on 10-17-2022 are also included in this section.

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232482  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** blh blah ddddddddddddddddddddddd

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**Please provide your first and last name** bob jones

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232483  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

---

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** test test

---

**Please provide your first and last name** tony tiger

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232484  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Other: test

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|Public Comment - webpage copy|Webpage/tab name: Board Meeting Public Comment Guidelines|The Montana Department of Labor & Industry's Business Services Division implemented public comment guidelines for its professional and occupational licensing board meetings August 1, 2022. |The purpose of the public comment guidelines is to provide a consistent approach and expectation for public members who want to comment during board meetings. The change in approach affords public members the ability to take part in their government while balancing the board's need to conduct its business in a timely fashion.|What are the primary changes?|At the beginning of each meeting there is an opportunity for the public to comment on matters which are not on the current meeting agenda. The board cannot act on or discuss items not on the current agenda. The board may direct staff to put an issue brought forward from the public on a future meeting agenda. ||The public may comment on an agenda item during the public comment period for each board action item. Each meeting agenda will reflect this time after the introduction of a topic. If there is no public comment, the chair or presiding officer may immediately close that item's public comment period and proceed with the meeting. The chair or presiding officer may limit comments to proceed with the meeting as well. Once the public comment period is closed, the public may not provide further comment during the remainder of the agenda item discussion, unless specifically requested by the chair or presiding officer of the meeting. Written public comments may be submitted and are encouraged. ||How do I submit my public comments?|Please submit your written public comment(s), related to an agenda item, no later than seven (7) days prior to a scheduled board meeting. In your comments, please include your first and last name, and what organization you are representing, if you are representing one. Please also specify what agenda item you are commenting on, or if it is a general comment for consideration. Keep your comments direct and detail the issue(s) you want to bring to the board's attention. Comments unrelated to an agenda item may be submitted at any time and are encouraged. ||Written comments can be submitted by email either to the board's executive officer or board specific inbox. Contact information is located here; simply navigate to the appropriate board and scroll to the bottom of the webpage where contact information for each officer and inbox is located. If you have further questions, please reach out to the executive officer of the board you are interested in. ||Please see the Public Comment Guide and FAQ below for more specific details:|Public Comment Guide (link doc)|Public Comment FAQ (link doc)|

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**Please provide your first and last name** test tony

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232485  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: This serves as a guide to understand the public comment process during board meetings. This process applies to all boards and programs administered by the Business Standards Division (BSD) under the Montana Department of Labor & Industry (DLI).

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This serves as a guide to understand the public comment process during board meetings. This process applies to all boards and programs administered by the Business Standards Division (BSD) under the Montana Department of Labor & Industry (DLI).|Licensing boards and programs are required to provide opportunities for the public to participate and make public comment on board business. 2-3-101, et seq., MCA. Interested members of the public are encouraged to submit comments on topics, under the jurisdiction of the board, even if the comment does not relate to an agenda item.|At the beginning of each meeting is an opportunity for the public to comment on matters which are not on the current meeting agenda. The board cannot act on or discuss items not on the current agenda. The board may direct staff to put an issue brought forward from the public on a future meeting agenda.|The public may comment on an agenda item, during the public comment period for each board action item. Each meeting agenda will reflect this time after the introduction of a topic. If there is no public comment, the chair or presiding officer may immediately close that item's public comment period and proceed with the meeting. The chair or presiding officer may limit comments to proceed with the meeting. Once the period is closed, the public may not provide further comment during remainder of the agenda item discussion, unless specifically requested by the chair or presiding officer of the meeting.|Notes for Commenters||Staff recommends you join the meeting prior to the start time indicated to assure your opportunity to comment. If you wish to provide comment, it is your responsibility to be available and prepared. Please be ready when recognized. Clearly state your first and last name, its spelling, and identify what organization, if any, you represent. After you have provided comment, you may choose to leave or observe the remainder of the meeting.|Tips to make your comment time effective:||1. Be timely - Each agenda clearly shows the date, time, and place of the meeting.||2. Assure you can connect or attend - Information to attend is included on the posted agenda for each meeting. Participants who attend by electronic means should be aware that staff may not be immediately available to address technical needs. | ||||3. Organize, prepare your statement, and be brief - Prepare a concise 2 to 5-minute statement detailing the issue(s) you want to bring to the board's attention. Be considerate of time as there may be others wishing to speak.||4. Do not be repetitive - Limit your remarks to the subject of the agenda item and try to avoid repeating what others have said.||5. Avoid asking questions - Don't ask questions of board members or other speakers.|This is the board's chance to hear from you.||6. Be respectful - While disagreeing with other viewpoints is appropriate, do not directly attack or argue with another speaker.||7. Submitted comments and documents are public records - Meetings are recorded pursuant to state law. Additionally, any submissions you may provide to the board are public records which may be requested and produced.||8. Provide additional information - If you feel an issue cannot be, or was not, adequately covered in the time provided, submit your comments in writing to the board.|

Please provide your first and last name testy tony

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232486  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: member of the association of who cares about this lets see if this truncates the verbiage

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

[This serves as a guide to understand the public comment process during board meetings. This process applies to all boards and programs administered by the Business Standards Division (BSD) under the Montana Department of Labor & Industry (DLI).|Licensing boards and programs are required to provide opportunities for the public to participate and make public comment on board business. 2-3-101, et seq., MCA. Interested members of the public are encouraged to submit comments on topics, under the jurisdiction of the board, even if the comment does not relate to an agenda item.|At the beginning of each meeting is an opportunity for the public to comment on matters which are not on the current meeting agenda. The board cannot act on or discuss items not on the current agenda. The board may direct staff to put an issue brought forward from the public on a future meeting agenda.|The public may comment on an agenda item, during the public comment period for each board action item. Each meeting agenda will reflect this time after the introduction of a topic. If there is no public comment, the chair or presiding officer may immediately close that item's public comment period and proceed with the meeting. The chair or presiding officer may limit comments to proceed with the meeting. Once the period is closed, the public may not provide further comment during remainder of the agenda item discussion, unless specifically requested by the chair or presiding officer of the meeting.|Notes for Commenters||Staff recommends you join the meeting prior to the start time indicated to assure your opportunity to comment. If you wish to provide comment, it is your responsibility to be available and prepared. Please be ready when recognized. Clearly state your first and last name, its spelling, and identify what organization, if any, you represent. After you have provided comment, you may choose to leave or observe the remainder of the meeting.|Tips to make your comment time effective:||1. Be timely - Each agenda clearly shows the date, time, and place of the meeting.||2. Assure you can connect or attend - Information to attend is included on the posted agenda for each meeting. Participants who attend by electronic means should be aware that staff may not be immediately available to address technical needs. | ||||3. Organize, prepare your statement, and be brief - Prepare a concise 2 to 5-minute statement detailing the issue(s) you want to bring to the board's attention. Be considerate of time as there may be others wishing to speak.||4. Do not be repetitive - Limit your remarks to the subject of the agenda item and try to avoid repeating what others have said.||5. Avoid asking questions - Don't ask questions of board members or other speakers.|This is the board's chance to hear from you.||6. Be respectful - While disagreeing with other viewpoints is appropriate, do not directly attack or argue with another speaker.||7. Submitted comments and documents are public records - Meetings are recorded pursuant to state law. Additionally, any submissions you may provide to the board are public records which may be requested and produced.||8. Provide additional information - If you feel an issue cannot be, or was not, adequately covered in the time provided, submit your comments in writing to the board.}|This serves as a guide to understand the public comment process during board meetings. This process applies to all boards and programs administered by the Business

Standards Division (BSD) under the Montana Department of Labor & Industry (DLI).|Licensing boards and programs are required to provide opportunities for the public to participate and make public comment on board business. 2-3-101, et seq., MCA. Interested members of the public are encouraged to submit comments on topics, under the jurisdiction of the board, even if the comment does not relate to an agenda item.|At the beginning of each meeting is an opportunity for the public to comment on matters which are not on the current meeting agenda. The board cannot act on or discuss items not on the current agenda. The board may direct staff to put an issue brought forward from the public on a future meeting agenda.|The public may comment on an agenda item, during the public comment period for each board action item. Each meeting agenda will reflect this time after the introduction of a topic. If there is no public comment, the chair or presiding officer may immediately close that item's public comment period and proceed with the meeting. The chair or presiding officer may limit comments to proceed with the meeting. Once the period is closed, the public may not provide further comment during remainder of the agenda item discussion, unless specifically requested by the chair or presiding officer of the meeting.|Notes for Commenters||Staff recommends you join the meeting prior to the start time indicated to assure your opportunity to comment. If you wish to provide comment, it is your responsibility to be available and prepared. Please be ready when recognized. Clearly state your first and last name, its spelling, and identify what organization, if any, you represent. After you have provided comment, you may choose to leave or observe the remainder of the meeting.|Tips to make your comment time effective:||1. Be timely - Each agenda clearly shows the date, time, and place of the meeting.||2. Assure you can connect or attend - Information to attend is included on the posted agenda for each meeting. Participants who attend by electronic means should be aware that staff may not be immediately available to address technical needs.||||3. Organize, prepare your statement, and be brief - Prepare a concise 2 to 5-minute statement detailing the issue(s) you want to bring to the board's attention. Be considerate of time as there may be others wishing to speak.||4. Do not be repetitive - Limit your remarks to the subject of the agenda item and try to avoid repeating what others have said.||5. Avoid asking questions - Don't ask questions of board members or other speakers.|This is the board's chance to hear from you.||6. Be respectful - While disagreeing with other viewpoints is appropriate, do not directly attack or argue with another speaker.||7. Submitted comments and documents are public records - Meetings are recorded pursuant to state law. Additionally, any submissions you may provide to the board are public records which may be requested and produced.||8. Provide additional information - If you feel an issue cannot be, or was not, adequately covered in the time provided, submit your comments in writing to the board.|

Please provide your first and last name testy2 tony

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232487  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Test comment 1

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**Please provide your first and last name** Kels Mac

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232488  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

LCSW process for inactive to active license change is confusing and expensive. CEU need to be completed in the last 2 years. Why not just make it 10 hours for every year of inactivity. ? I have a Montana LCSW license even though I do not live in Montana. I hope to get there someday. I do not provide clinical services in Montana which is a reason why it is on in active status. I don't want to cancel it and then you have to go through the entire process of renewing it. I wish you had reciprocity with Wy and could make this licensing a bit easier. It is expensive for me to maintain when I am not generating any income from my Montana license.

**Please provide your first and last name** Kimberly Preletz

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232489  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The inability of pre-licensure candidates under the supervision of an LCSW to accept Medicaid is a huge and ever growing obstacle and barrier to care for many in our rural state. Is there something that could be amended to allow for the supervisory billing of Medicaid outside of community health settings? Doing so would help a number of people in this state access desperately needed mental health services.

**Please provide your first and last name** Camalla Larson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232490  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The board of behavioral health requires that an SWLC must receive half of their supervisory hours by an LCSW. I suggest that the "50% of licensure hours" be removed as a regulation and that all hours of an SWLC working toward licensure while supervised by a licensed psychologist be counted towards licensure. This will provide opportunity for SWLCs to be licensed potentially easier and by a provider who is skilled in clinical care. This means 100% of hours could be with an LCSW OR LP. ||I also suggest that an LMSW bound licensee (or one seeking LBSW) be able to earn half of their lisencure hours with a licensed psychologist or an LCPC. This will also allow greater accessibility for non-clinical bound licensed social workers in obtaining licensure, with half of hours with an LCSW and as needed, the other half with an LCPC or clinical psychologist.

**Please provide your first and last name** Sarah Potts

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232491  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Public interest lawyer.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The Department engages in an unnecessary comparison of the personal qualifications in Montana's statutes versus the statutes of the state from which a licensed applicant is moving. The Department is burdened by the responsibility to determine if the personal qualifications are "substantially similar." ||Relieve the Department of this burden! It expensive, time consuming and unnecessary. Instead, The Department should treat license like Montana's DMV does. The Department should issue a Montana license "while you wait."||Specifically, Montana should repeal the requirement that statutes from other states be "substantially similar" to Montana's statutes, Seven of the 16 other states that have enacted recognition laws do NOT require this unnecessary test.

**Please provide your first and last name** Lee McGrath

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232492  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I recommend looking at the state of Colorado and how they do professional licensing. It was an easy process that took two weeks for me to get my license. They are also moving forward with reciprocity with other states. We should be part of this, we do not have enough providers in state. My private practice is completely full and I am receiving up to 10 emails and phone calls per week of people looking for services and all my referral sources are also full. It has been like this since 2020, people are struggling in our state to find mental health providers. I was on the AZ counseling association board and involved in the Colorado counseling association board, I would be happy to chat about my experiences and would like to help the MT board in any way.

**Please provide your first and last name** Rebecca Stokes

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232493  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Make the renewal time line longer for RN licenses. ||Should only have to renew once every four years instead of every two.

**Please provide your first and last name**

Randolph Parker

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232494  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I would like to see the fee for the PDMP Maintenance for medical professions removed for people not currently practicing in MT because it would not be legal or necessary for us to access the PDMP in this scenario so paying for it seems unfair.

**Please provide your first and last name**

Erica Cisler

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232495  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: I have 2 professional license's.

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I don't understand what im supposed to say.

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**Please provide your first and last name** Shelly Keel

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232496  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a licensed Private Investigator here in Montana. I had received my Private Investigator license in Colorado before being licensed here in Montana. Colorado has now completely eliminated any of the requirements in Colorado. Also, Wyoming does not require anything for licensure. While I am not sure, there should be no requirements, I do believe the requirement for \$500,000 of insurance if you are working on your own and not through an attorney's office, is totally excessive. In Colorado, before the requirement was completely dropped, it required a \$100,000 bond. It cost \$100 per year versus the \$1,200 that I was quoted for errors and omissions if I practiced on my own. Totally ridiculous.

**Please provide your first and last name** Robert Eddleman

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232497  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

It would more effective and efficient to have EMS provider licensing under DPHHS. Currently EMS services and vehicles are licensed by DPHHS, and EMS providers by DLI. Would be more cohesive if EMS & Trauma could have control for all EMS related issues including services, protocols & guidelines, and provider licenses. This disconnect has prohibited growth and progressive patient care protocols.

**Please provide your first and last name**

William Torres

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232498  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I would like to be involved but work during scheduled webinar. Does anyone else have this issue?

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**Please provide your first and last name**

Barbara Wiseman

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232499  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I taught school for 25 years before becoming a therapist. My continuing education needed to be turned in every 5 years. It cost much less to relicense, as well. Plus, much of the continuing education credits were FREE of charge from the State or district where I worked. With a Master's Degree, I make LESS than I did with a BSED teaching elementary education and need to pay more for continuing education and then YEARLY, expensive licenses! I would like to see the re-licensure done every five years for professional therapists and it would be nice to see the cost of licensure dropped lower.

**Please provide your first and last name** Kristi Elliott

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232500  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a huge proponent of reciprocity licensing. It is no different to do medicine in MT than any other state. Unique laws or diseases or our region will easily be taught by coworkers. We already all pass a nationwide license (NAVLE) that roughly proves our ability, the capitalistic market will thereafter work each vet into their appropriate role. I do feel there should be a board to make a complaint should there be a serious problem. Being so beautiful, Montana is poised to be the perfect state to attract veterinarians for a summer adventure thus reciprocity is a partial solution to our veterinary shortage. Further, embracing ""Traveling Vets,"" like human health care has, allows our vets an opportunity for something fresh thus giving them longevity in this difficult career.

**Please provide your first and last name** Lisa Galvin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232501  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: PE applicant by comity

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The online application process allowed me to submit the PE application with multiple items missing. I wasn't aware of the checklist and the laws/rules questions until after submitting my application and being notified I was missing elements of the application. The application should require you to check boxes that you have uploaded all required documentation and already requested NCEES to transmit your record, before you can complete the application. ||Also, the experience sheets are a repeat of what is in my NCEES record. Not sure why those are needed if you are submitted an NCEES record.||Lastly, the laws and rules questionnaire seemed rather cumbersome to find the specific code reference. Other states provide the general code to start from for a specific question, then once that code is reviewed you can easily confirm the correct response.

**Please provide your first and last name** Jason Beard

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232502  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Problem: Forcing psychologists and MD's who review Social Security disability claims to obtain Commercial Contractor Insurance over and above the malpractice insurance we already have.||\*Customers do not come to our office; therefore no customers will be tripping on the rug or be injured in any way.||\*We do not visit customers in their homes, so there is no danger of us breaking windows, starting fires, or causing any other type of damage.||\*We do not advertise, so there would never be an issue with false advertising.||\*We do not manufacture any products, so there would never be an issue with product liability. ||\*The only other exposure to the state would be if one of us creates unnecessary expense for the state, and our contract already requires us to pay for that.||Proposed solution: Discontinue the requirement for commercial liability insurance. It is a waste of our time and money. The only liability we would be exposed to is already covered by our malpractice insurance.

**Please provide your first and last name** Dean Gregg

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232503  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

If you want to consolidate all licenses (acupuncture, Physical therapy, Chiro, massage, naturopaths, etc) under Medical licensure. The concern is medical doctors would hold the power to take our license, deny our license, or dictate standard of care and how we care for patients. Not ideal.

**Please provide your first and last name** Michelle Dunn

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232504  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Licensed Clinical Professional Counselors (LCPCs) are unable to see clients across state lines who travel out of state (i.e., vacation, college or temporary work such as a traveling nurse). In an order to provide continuity of care, LCPCs have to apply for individual state licensure in each state for clients who travel out of state (even temporarily). This creates barriers in access to care (i.e., gaps on services, delayed licensure approval, additional expenses, etc.). This also creates barriers for current Montana licensed counselors and out of state counselors moving to Montana or providing services via tele-health thus limiting mental health services that could be available in our state. |LCPCs suggest Montana Board of Behavioral Health consider implementing a Counseling Compact Privilege (CCP). This is similar to a Nurse Licensure Compact or an interstate compact for psychologists and psychiatrists. This would help to increase licensure mobility and increase access to care while maintaining public protection at the state level. Under a CCP, counselors can practice in Montana from other CCP states, without having to obtain additional licenses. This would increase efficiency of the out of state counseling licensure process and decrease the delays of licensure reviews, approvals, etc. It would allow for Montana licensed counselors to practice in other CCP states without obtaining additional license and provide continuity of care to clients who travel out of state. In addition, it would increase job growth and revenue in Montana. |It is time for Montana to approve counseling license mobility across state lines to increase access to mental health services.|

**Please provide your first and last name** Tara Sorenson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232505  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Crane Licensing vs Certification vs both. ||The industry standard and OSHA final rule requirement for Crane operators is nationally recognized crane certifications. The private sector certification companies require continues training and testing generally every 5 years. Montana state crane department requires people who have these licenses to do a bunch of pointless paperwork that is redundant with the requirements to be certified. The Montana crane license department was one of the first of its type, unfortunately the department has not stayed up with the industry, OSHA or the ideas of continuous training and testing. The liability of issuing crane licenses to folks who haven't studied in 30 years is notable. Also its generally know that the state has issued tower crane licenses to folks who practical tested on a forklift with a JIB and that is really scary. ||1. If a Crane operator has a OSHA recognized nationally certification, no other paperwork should be required, other that personal contact information and the fee for a state license. |2. Eliminate the Crane licensing department altogether as the private sector and federal government have a solution in nationally recognized certifications. (many states don't have a crane license department, it was a good idea in the past but is now just redundant ||

**Please provide your first and last name** Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232506  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Licensed Denturist from Maine

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Simply put, if you have a valid license to practice any form of healthcare/ dental care in any of the states or Canada, you have already had a full written and clinical examination. The bodies and mouths of people in Maine are no different than the bodies and mouths of people in Montana. There could easily be reciprocity between state licenses and even US and Canadian licenses.

**Please provide your first and last name** Kelly Carbone

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232507  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am Licensed Public Accountant in the State of Montana, and I am one of three remaining licensees holding the designation who was grandfathered to practice in Montana as an LPA when HB44 was signed into law by Governor Steve Bullock in 2015 which among other things closed the designation to new applicants. ||However, that bill effectively emasculated LPAs by effectively deleting references to the designation from statute save for Statute 37-50-318 of the MCA which allows us to renew our licenses and subjects us to the provisions of the public accountancy licensing chapter but since the MCA otherwise only makes reference to certified public accountants there and elsewhere in statute, LPAs have no substantive status as licensees (please review 2015 HB44 and note that save for Section 21 of the bill which would become Statute 37-50-318, all references to licensed public accountants was stricken from the MCA as part of the bill).||Further compounding this problem is the fact that while LPAs pay annual fees and are subject to the provisions of Title 37 Chapter 50 of the MCA, there is no representation of LPAs on the board of accountancy per Section 2-15-1756 of the MCA; the board is comprised of 5 CPAs and 2 public members, thus our interests are not represented by the board from which we are regulated, making this a form of "Taxation Without Representation".||Because LPAs are not represented in statute, but are licensed and regulated by the Board of Accountancy, there is an implicit assumption that all Montana licensed accountants are CPAs. ||In light of these facts, my proposed solution is to formally and officially designate the remaining LPAs as CPAs. ||There are many reasons, but a primary reason is to eliminate the ongoing confusion as to what the LPA title entails and what LPAs can do as practicing accountants based on the obscurity and obsolescence of our professional title. ||1. LPAs have the exact same rights, privileges, obligations, and scope of duties as CPAs; we can compile, review, and audit financial statements and perform other attestation services. |2. Montana LPAs are also considered CPAs by the IRS for the purpose of representing clients before the IRS.|3. It allows mobility to practice in other states and to obtain reciprocal licenses in other states, particularly those where there is a universal licensing reciprocity statute; since the LPA designation has been eliminated in all but a few states, it is usually not recognized or considered for reciprocal licensing. A CPA designation will eliminate these barriers.|4. The remaining LPAs have had no disciplinary action in all the years they were licensed; their licenses have been kept in good standing since their issuance going back at least 10 years and up to over 40 years ago. It is abundantly clear that our status as CPAs will pose no harm to the public.|5. Most practically, it is well known in the accounting profession that there is a growing shortage of CPAs due to the growing number of Baby Boomer CPAs retiring and a shrinking number of Millennials and iGens (aka Gen Z) pursuing the CPA designation. Although there are only 3 Montana LPAs to add to the CPA ranks, I would think that the profession would want to add as many CPAs in the pipeline as they can get.||In conclusion, let's bolster the CPA ranks by converting the remaining 3 LPAs to CPAs. The risk is very low, there is nothing to lose, and a lot to gain.

Please provide your first and last name Jason M. Jones

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232508  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Have massage licenses renewed every two years as the cosmetologist/manicurists are currently. Reduce the cost of licensing for massage therapists. Make the board more proactive instead of reactive

**Please provide your first and last name**

Jewell Taylor-Zweegman

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232509  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In order to increase access to services, portability, and support military spouses, keep Montana Licensing at the forefront of standards, and support military spouses and families, please consider introducing legislation for Montana to enact the Interstate Counseling Compact.

**Please provide your first and last name**

Lisa AndersonMangan

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232510  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

What follows is my recent experience trying to get mere reciprocity of my architect's license in Montana. The National Council of Architecture Registration Boards is nothing more than a swindling operation and the Montana Board of Architects is derelict in its duties. My experience is no doubt shared, to greater and lesser degrees, by everyone who encounters these dysfunctional (at best) institutions. ||In February of this year I called Dan Ritter (Executive Officer, Montana Department of Labor and Industry) and asked if NCARB certification is the only way to get reciprocity from another state to obtain an architect's license in Montana. He told me that NCARB certification is the only way. (He later told me otherwise, as I explain below.) I have over 20 years of experience in architecture, have a B. Arch (professional) degree, and have been licensed in California since 2014.||I proceeded to get an NCARB certificate, and during the process found that NCARB's operations are severely problematic both for the individual applicant and for the profession of architecture as a whole.||The non-refundable application fee is \$1,100. The NCARB website says this high, exploitive fee ""will cover the costs of evaluating your credentials for the NCARB Certificate."" Does evaluating credentials, to the extent this is even done, cost anywhere near this much? No. Evaluation of a transcript is nothing more than a glance, and test records are obtained electronically, etc.||Why do my credentials need to be evaluated in the first place? I'm licensed in California already. This can be discovered and confirmed - officially - on the internet in a matter of seconds. California already evaluated my credentials for licensure; the work has been done. Montana should acknowledge this and grant me reciprocity immediately. Instead, NCARB has been inserted as a gatekeeper to extract exorbitant fees and is thereby wasting the time (and money) of architects, citizens and taxpayers like me. ||On top of this, NCARB is staffed entirely by incompetent, dysfunctional employees who understand they are protected bureaucratic functionaries, and operate as such.||I attended three different architecture schools (transferring twice); two were in B. Arch. degree programs before and after a year spent at an architecture school in England. NCARB told me they needed transcripts from all three schools. But I graduated with a B. Arch degree, and in order to transfer to this third school, from which I graduated, I needed to give them transcripts from my previous schools. Why does NCARB need these other transcripts if all that is required for licensure is a B. Arch degree? Why doesn't NCARB only require a B. Arch degree, and the transcript for this alone, because all necessary transfer credit is assumed therein? ||So I obtained transcripts from all three schools and paid the fees for them. The transcript from the school in England was especially difficult to obtain, in part due to their record-keeping and the time that has gone by since I attended in 1997-98. These transcripts were forwarded to NCARB. I noticed that NCARB wasn't including my transcript from the school in England (the Architectural Association), and I asked NCARB why they were not including it, and they told me it wasn't necessary - in direct contradiction to what they told me emphatically before I paid for and obtained the transcript. Then why did NCARB need a transcript of the school I attended (Carnegie Mellon University) before I attended the AA? I have pages-long email correspondence with the AA

which shows their time and effort spent digging up my transcript which, it turns out was totally a waste, as it was finally never needed or recorded by NCARB. Universities charge nominal fees for transcripts. Why does NCARB charge huge fees for "evaluation" of these transcripts? The truth is that NCARB doesn't evaluate these transcripts, but does nothing more than glance at them, if that. The waste that results from the faulty NCARB certification process is significant and it is not isolated. ||In communicating with NCARB about my transcripts I was told on the phone that they receive over 500 transcripts per day (!) and that they recommend I call them regularly and ask them to check their email for my particular transcript, and then they could move it to the front of the line. What happens to the other transcripts they receive? (No one believes they receive over 500 per day.) What if I don't call them and tell them to check their email? What if they don't want to move my transcript to the front of the line? Why are some transcripts given preference, even upon request, and not others? Why don't they process transcripts as they are received? In what other lines of work is, "You should call me and tell me to check my email" an acceptable (and necessary) step in the process? I had to call NCARB many (probably two dozen) times and tell them to check their email and/or ask them to clarify their contradictory information to me. Nearly all information from NCARB to me was communicated by phone, and usually after the fact, not in writing and not by instructions on their website? Why?||NCARB told me I could get a Verification of Experience form filled out and signed by a previous colleague or employer to account for my experience in architecture. I had a colleague fill out this form. He emailed it to me and I forwarded it to NCARB. I called them to ask them to check their email for this form. They told me to have the colleague send it directly to them - at a customer service email address. This is understandable, but why wasn't I told this initially? Why isn't this stated on the form itself? Why don't they have a portal, or even just an email address listed on their website for such submissions? When they finally received the form - once again, after I called and told them to check their email for it - they told me that the referenced experience had to be acquired in the last seven years, for some reason. So I then had to bother another, more recent, former employer to fill out this form instead. What if none of my 20+ years of experience had not occurred in the last seven years? Why does NCARB require college transcripts from 25 years ago, but all experience has to be from the most recent seven years? What if the former employer is deceased (as is the case with one of my former employers and the one for whom I worked the longest)? What if the former employer simply doesn't want to provide the verification of experience?||The crucial flaw in the NCARB certification process is that it fundamentally relies on third party "experience verification." But these third parties are not compelled to provide this supposed verification, nor are they incentivized to provide it, nor are they compensated for it. It is simply hoped that they provide it out of the kindness of their hearts. (Does NCARB do anything out of the kindness of their hearts?) Further, how can their verification be confirmed by NCARB as legitimate? How often does NCARB even attempt to confirm this information? But beyond all this: No record can be said to be

confirmed or verified or official or legitimate in any way (by NCARB or anyone else) when it relies fundamentally and essentially on the unaccountable word of a third party. It can be said that usually employers are honest and willing to help. But it can't be said that the record is thereby verified and legitimate. It can be said that NCARB can threaten the employer with audit or charges of perjury, but it still can't be said that the record is thereby verified and legitimate. Some employers are unwilling to provide this record? What can the candidate do in this case? Indeed, the very fact that NCARB necessarily burdens a candidate's former employer with this task only demonstrates the bogusness of the entire procedure. And if one part of the record is unverified (and practically unverifiable) then all other parts of the record are moot. All this is especially so when record verification is the only reason NCARB certification occurs in the first place. NCARB collected my licensing exam scores automatically from California, and these are shown in my online NCARB record, with the exception of the results from the California Supplemental Exam. California has the strictest licensing requirements in the country, as no other state requires this additional supplemental exam. Why doesn't NCARB obtain this CSE exam result? They require transcripts from colleges I attended 25 years ago but not this very important, difference-making exam result? It is peculiar that in their function of compiling records, they omit this exam result. Without this result, my complete record can't be evaluated. Then a month after I finally obtained license reciprocity in Montana, I had to tell NCARB to show it on my online certificate. I had to tell them what to do with my records at every step of the way. I had to tell them to do the job I was paying them \$1100 to do, and their required labor amounted to almost nothing. Why doesn't Montana's record update automatically on NCARB's record? Why can NCARB collect my California exam records but not the reciprocal Montana license I obtain via their certificate? I paid NCARB \$385 to transmit my record certificate to the Montana Board of Architects. What do I get for this, other than waste? This transmittal should be free and automatic, if required at all. Now I have to pay an annual renewal fee of \$225 for NCARB to keep my record online - requiring near-zero labor or maintenance on their part. California charges me about \$300 every two years for my actual license, but NCARB wants to charge me \$450 over that same two years for a simple redundant and unnecessary electronic record. I received a paper certificate in the mail from NCARB. What does this certificate represent? It doesn't represent anything I have done other than waste my time and money. It actually, as intended, represents the illusion of legitimacy, validity and status where in fact there is nothing but waste and dysfunctional bureaucracy. It is yet more letters for someone to append after their name to keep the fakery of credentialism alive. The fundamental points that demonstrate NCARB's effective illegitimacy and the necessity for abolishing the current NCARB certification procedure with regard to, at minimum, license reciprocity are: 1. NCARB certification and verification relies on the good will and honesty of unaccountable third-party colleagues or employers. 2. NCARB can immediately find a candidate's license records from another state. Reciprocity should be granted immediately from states with equivalent, or more stringent, licensing

requirements.[3. NCARB's fees are much higher than necessary and are exploitive.[4. NCARB employees are incompetent and are incentivized to not do their jobs.][The Montana Board of Architects has a duty to address this problem directly and thoroughly and, ultimately, to solve this problem. They have a responsibility to architects, and prospective architects and to tax-paying citizens at large. It is not a small or isolated problem; it effects everyone who deals with NCARB. Part of the problem is lack of oversight and accountability. Part of the problem is that required use of NCARB was (foolishly, if not worse) codified at one point. Part of the problem is that many state boards tacitly agree to continue to endorse the problem of NCARB. If one state board draws attention to the problem, then the rest are shown to be part of the problem. Please do everything in your power, collectively and individually, formally and informally, to remedy this problem. The board exists for fiduciary and oversight purposes such as these. ][The board should seek to establish processes that are legitimate, transparent, streamlined, and accountable, regardless of what other state boards may or may not do, and regardless of how many (or how few) letters like this you receive. Reciprocity from states of equal or more stringent requirements should be immediate with a nominal fee, without NCARB involvement at all. As it is now, NCARB is little more than a legalized and protected racket. It is a burden on, and embarrassment to, the entire profession and on individuals like me who have to endure it - and pay for it.][On May 3, 2022, I called Dan Ritter again after this whole experience to make him aware of these issues with NCARB, as I expected it to be information he would want to know, and with some hope for oversight and accountability of NCARB. I asked him why Montana doesn't simply acknowledge my California license as enough for reciprocity. He told me at this time that requirements in California are not as strict and so that's why they don't look at a previous license in that state directly but instead require the NCARB certificate. But California has long had the strictest requirements of any state, and I suspect they still do. Ritter then told me that for reciprocity in Montana, for those already licensed in California, there are options other than NCARB certification. But, as I mentioned, when I called him in February of 2022, before my NCARB certification, he told me then that the only way to achieve reciprocity was via NCARB certification. I pointed out this contradiction to him and he then tried to obfuscate and confuse the matter, without denying what he had previously told me, by telling me that a California applicant had been turned down because he didn't have an NCARB certificate. He also told me that the board had changed the policy with regard to allowing reciprocity from California recently, pretending that this is the reason for his giving me contradictory information between my two calls with him this year. I asked him when the board changed their policy and he told me it was in 2019. 2019 is not ""recently"". (He wanted me to think recently was sometime since my first conversation with him.) He understood exactly what I was asking him but was intentionally misdirecting and confusing the conversation because I had pointed out his contradiction. I repeatedly tried to get clarification as to what these two non sequiturs had to do with what we were talking about, but just got more misdirection. He finally hung up

on me. This is a shameful way for anyone, much less a public servant, to behave. Further, it is counter to his actual role and counterproductive to the purpose of the board and the Montana Department of Labor.]]

Please provide your first and last name Nels Hefty

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232511  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: MSW Graduate

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Considering the recently released data which shows ASWB testing of social workers consistently creates inequities in licensure (white test-takers pass on first attempt at a much higher rate):||The state board should remove the testing requirement to become an LCSW Candidate. As a profession which aims to improve social justice, having a known unjust testing system as a gatekeeping system does not align with the ethical values of the profession.

**Please provide your first and last name** Scott Gittens

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232512  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Registered Dietitians are the known "nutrition experts" in the healthcare field. Many individuals do not understand the difference between a dietitian and a nutritionist. If the licensing for nutritionists goes away, this could potentially cause harm to the public as not all nutritionist are qualified, educated or should legally be able to give away nutrition information. Please do not let the uneducated enter the field of dietitians who go to school for this for 4-8 years. Please keep licensing for nutritionists in the state of MT.

**Please provide your first and last name**

Carly Hart

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232513  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Thanks for looking at better ways to issue license and reduce red tape

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**Please provide your first and last name** KIT CARSON

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232514  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the opportunity to comment and share my thoughts on landscape architecture licensure. I am a Montana landscape architect licensee and serve/served as the Eastern Montana Chair on the IMASLA Executive Board. During my twenty plus years as a licensed Landscape Architect my area of practice has focused on the active recreation aspect of our communities most frequently in Schools and Parks. Many of my current and past projects are with several of our small rural communities. Currently we are working in several communities such as Troy to design and help the school district fundraise the dollars for a new six lane all weather track. A second small community is the new Winifred School, located north of Lewistown along the Missouri Breaks. This project is a project fully funded by a private donor, the single largest philanthropic donor in Montana History. As Landscape Architects we are responsible for the new all-weather track, the new Synthetic turf Surface for the football field, field lighting as well as the full site landscape and irrigation. A larger more prominent recent project is mine is Montana State University Football Operations Building and Stadium Turf Field within Bobcat Stadium. Again, Landscape Architects lead the site design, plaza, paving, plantings, ADA Ramps and stadium access, as well as the renovation of the drainage and synthetic turf interface with the new building. All three of the above examples are facilities within our communities within and around Montana that are all improvements of the built environment, but also all 3 projects needed the expertise of a Landscape Architect familiar and technically skilled to ensure the designs all meet the safety criteria for students and athletes who use these facilities daily for both school activities as well as school and community sports teams. Every project above is driven in design for the safety of users and athletes that include but are not limited to Head impact criteria and G-max, stormwater needs of the site and facilities as well as many other aspects of coordination with the Architects, Civil and Structural Engineers in a team environment for the over all end users all driven around the safe use and longevity of our public infrastructure and ensure the best use of public dollars. My license as a Landscape Architect is critical to the health safety and welfare of our states most precious resource, children. Again, I appreciate this opportunity and I agree with the comments submitted by ASLA Nationals and on behalf of the IMASLA Chapter.

**Please provide your first and last name** Erik Sweet

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232515  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the opportunity to comment and share my thoughts on landscape architecture licensure. I am a Montana landscape architect licensee and serve as the Past President on the Idaho/Montana American Society of Landscape Architects Executive Board. I have worked on many projects including the renovation of the Missoula County Fairgrounds that included trails, plazas, and stormwater treatment, Russell Street improvements in coordination with the Montana Department of Transportation, and affordable housing projects such as the Trinity projects in Missoula providing safe and enjoyable outdoor space for residents. ||My license allows me to make my living by improving and protecting the vital infrastructure, natural resources, and communities in Montana. Again, I appreciate this opportunity and I agree with the comments submitted by ASLA Nationals and on behalf of the IMASLA Chapter.]

**Please provide your first and last name** Kate Dinsmore

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232516  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a member of the Montana Academy of Nutrition and Dietetics and Licensed Nutritionist (LN). First, I assert that the Licensed Nutritionist (LN) is best managed as administered by the Board of Medical Examiners rather than by a state program. LNs are health care professionals who practice independently in patient-facing capacities in private practice, long-term care, home health, and hospitals and medical clinics, according to organizational policies and procedures, and in other situations in which public health and safety is a primary concern. Licensure of registered dietitian nutritionists (RDN) is a requirement in many health care facilities. ||By law one LN is a full member of the BOME and has been since enactment of the LN statute. The BOME president is the current LN member. I have attended BOME meetings, submitted complaints of unlicensed practice, and communicated with BOME directly. All situations have been dealt with professionally, competently, efficiently, and effectively. As MTAND's Consumer Protection Coordinator, I have recently worked with the BOME our national professional organization to suggest rule changes to LN licensure administration rules to promote efficiency and eliminate redundancy. These changes have been approved by the DLI. Considering that administration of LNs by the BOME is working well, sound licensing practices are followed, continued BOME administration of LNs is the safest for the public, most efficient and effective policy.||Regarding the directive for modernization, MTAND is drafting a bill to be introduced in the 2023 state legislative session that would update and modernize dietetics and nutrition licensure with the following improvements: tailoring licensure to its most effective use for public safety, expanding pathways for licensure that specify requirements for national accreditation of education, training, and supervised practice, expediting reciprocity to license qualified nutrition professionals, adding telehealth options for practice, specifying conditions for licensing active-duty military and military spouses, expanding exemptions from licensure requirements, requiring standardized continuing education, and maintaining governance of licensing by the BOME. Fingerprinting has not been part of the licensure application and is not part of the modernized licensure process.||The Montana Academy is interesting in working with the DLI in modernizing dietetics and nutrition licensure.

**Please provide your first and last name** Patrica Steinmuller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232517  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a licensed APRN, also licensed in FL. I am certified through ANCC. There is a stringent process for recertification; most employers require certification (at least psychiatric nursing requires this). My recommendation is that if the APRN maintains certification, that suffice for re-licensure, rather than requiring additional CEUs every two years. |Another possibility is to make the licenses good for 5 years, as the certification is good for 5 years. What is the magic in every two years? |Thank you for asking for input. I'm impressed that you asked, even if you don't listen, it's a step in the right direction.

**Please provide your first and last name**

Rebecca Dunn

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232518  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I would request that the Licensed Nutritionist License remain in it's current state of being overseen by the MT Medical Examiners Professional Licensing Board. Registered Dietitian services are an essential part of clinical care (same as Medical Doctors and Professional Registered Nurses). Public health Registered Dietitians ensure safe and professional care is provided to the general public. Solution: KEEP IT THE SAME, even if you have to raise our dues; it's worth it to us. The proposed changes will de-value our profession. It is costly to pursue a career as a Registered Dietitian. The steps are: complete a Bachelors degree in Food and Nutrition, complete a Dietetic Internship program (cost averages \$20,000.00), a Master's degree is required to take the RD exam, we pay for the exam, then we have to get 75 hours of professional development in 5 years to maintain certification. We pay our national certification dues and we pay to maintain our state license. It's a professional medical position that should be protected by MT Board of Medical Examiners Licensing.

**Please provide your first and last name** Molly Stenberg

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232519  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Montana already has lower requirements for nurses!! Which affects patients! Finger prints or background check is not something to make go quicker!! This is very important!! |And real estate licenses are to easy to get in this state! I know how hard it was yo get it in other states! Thats why there is so many complaints on teal estate agents!|

**Please provide your first and last name** Terry DiNovi

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232520  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Overall, the board of Occupational Therapy has really stifled growth in our profession. The profession necessitates a Masters or Doctorate education at this point and to allow us to even perform simple job related tasks we need certifications. Most of these certifications get bottle necked at the OT board and Licensing board. I think that with extensive upper extremity knowledge and treatment skills (masters or doctorate educated) that we should be able to perform Dry needling to the upper extremity (with successful completion of an accredited Occupational Therapy Dry Needling course). Further I think that as a board and state that we should pave the way to be progressive with allowing OT's to perform greater treatment interventions, provide modalities, and potentially even use OT's for diagnosing in our state. Healthcare is under served and we have willing and able OTs here to provide excellent care.

**Please provide your first and last name** James Gustafson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232521  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

A standard sunset clause for each and every new regulations imposed. In addition seek a way to sunset all previous regulations so as to create a time crunch for review by law makers and regulators to reivew and curtail outdated or incoherent regulation caused by societal progression.

**Please provide your first and last name** Matt Brosovich

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232522  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the opportunity to comment and share my thoughts on landscape architecture licensure. I am a landscape architect in training (LAIT) in Montana, and serve as the Western Montana Chair and the Montana State University Chapter Professional Liaison on the IMASLA Executive Board. I am currently pursuing licensure and preparing to take (and pay for) the LA licensure exams in Montana. I have been working the past 2.5 years as a landscape designer in Montana, to fulfill the 3 years' work experience under a licensed landscape architect that is needed to be eligible for licensure. Undoing the current licensure board would throw away much of my efforts since graduating from MSU's landscape design program, and it would be a major disincentive to current and future students to work professionally in the state of Montana. This will be a huge blow to the local planning and building industries which are already hurting from worker shortages in the professions. As our state inevitably grows in population, what we need is more incentive for young professionals in an already slim and aging workforce. Licensure through Montana will allow me to make my living by improving and protecting the vital infrastructure, natural resources, and communities in Montana. Again, I appreciate this opportunity and I agree with the comments submitted by ASLA Nationals and on behalf of the IMASLA Chapter.

**Please provide your first and last name** John Dohner

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232523  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Allow applicants requesting to sit for Journeyman electrical exam with qualifying electrical apprenticeship hours from another state who also have completed the schooling. There is no mention of a federal apprenticeship completion certificate in the application process and currently the state board is requiring it. This has prohibited a well seasoned apprentice electrician from being able to obtain licensure in Montana even though he resides in Montana

**Please provide your first and last name**

Melissa Abraham

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232524  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a counseling professor at MSUB and current licensee, I'm following licensing requirements across the country. The current counseling compact (<https://counselingcompact.org/>) has been passed in 17 states and has been introduced in many others. This allows member states to share licensing administrative burdens while still maintaining decision-making power for constituents. It basically means that all member states have the same requirements for training and honor the preparation of the clinician. Psychologists and physicians have had a similar licensing process for many years. Social workers and counselors are currently working on this to increase workforce and reduce red tape, which is why it is very timely that this initiative and the counseling compact to be happening at the same time.

**Please provide your first and last name** Aaron Mertes

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232525  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Make the application process easier and clear to sit for the journeyman electrical exam. Currently when apprenticeship electrical hours and schooling is met for application, the state board is still requiring federal apprenticeship completion certificate which is not mentioned/listed on application process. This is prohibiting testing for an experienced apprentice electrician.

**Please provide your first and last name**

Melissa Abraham

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232526  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Make application process for sitting for journeyman exam clear and attainable. The board is requesting federal apprenticeship electrician completion certificate which is not discussed on application process. The electrical board should accept hours and schooling completion certificate as requested on application and allow for applicant to sit for exam.

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**Please provide your first and last name** Ricardo AbrahamNazario

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232527  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

DO NOT do away with licensing in this state! This is yet another attempt to weaken labor markets in this state to flood our state with low wage out of state contractors that will drive down wages and take jobs from Montana residents.

**Please provide your first and last name** Robert Warren

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232528  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Propose individual licensed pharmacists can vote on certain board agendas from time to time when most appropriate to have a consensus among licensed pharmacists. Therefore, allow a certain number of pharmacist signatures via a portal app to be equal to a board member's vote.

**Please provide your first and last name** Brent Stein

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232529  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Upon initial licensing for occupational therapists, it would be adequate to verify national board certification vs asking for transcripts given they are required to pass the board exams. Continuing Ed is also required by the national board so yearly additional requirements is repetitive.

**Please provide your first and last name** Tara Wright

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232530  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The Board of Nursing is very responsive. I am licensed in a number of states and Montana is the easiest to work with. No change to the structure of function should be done. Also be aware that changes to Montana licensing requirements could adversely affect our multi state license. Please don't be a solution in search of a problem.

**Please provide your first and last name** Joseph Dunn

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232531  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

License Processing Efficiency: This suggestion is in regards to Electrician Licensing. Our code cycle is in 3 year increments, yet our MT license renewal is every 2 years. This means that every 6 years we double up on a "Code Update" in our Continuing Education , which is unnecessary. I suggest that we renew Electrician's Licenses with 16 hours of CE every 3 years to match our code cycles.

**Please provide your first and last name**

David Johnson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232532  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am represented by the board of dentistry, as a licensed dental hygienist. It would be great if the BOD understood that their role on the board is to protect the public. It would also be helpful if the entire BOD had to be educated on the educational requirements of the professionals they are representing. There is a lot of misconception in the education/curriculum of dental hygienists vs assistants. I believe this could help meetings run more efficiently if dental hygienists didn't have to educate the members of the board on what the curriculum and national/regional testing consist of when making decisions that affect their profession.

**Please provide your first and last name** Clancy Casey

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232533  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a licensed nutritionist (LN) and recently viewed on the DLI session website that my license is one of a least 10 licenses invited to the Aug 31 informational webinar. I am registered for this event. However, initially I was able to view the results of the first survey that was sent by the DLI to LNs. However, the results of the survey and the identification of the licenses invited to the webinar have been removed from the website. I am wondering why this has occurred and would like an explanation. ||Unfortunately, there were many problems with both the first and second surveys, especially since the options available for certain items offered choices unacceptable to many licensees, providing no option for a desirable choice, and with no ability to skip the item. In the future, surveys need to be validated before use so that the responses can be valid and meaningful. No one would trust a state program whose communication is not accurate or trustworthy.]

**Please provide your first and last name**

Patrica Steinmuller

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232534  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a licensed and registered dietitian/nutritionist, I believe that licensure provides the public with assurance that they are receiving science based nutritional recommendations ensuring the highest level of protection for their health and safety. This is especially true when providing medical nutritional therapy in which credibility is important of which licensure ensures the licensee possesses the knowledge, skills and competence to provide it. In my 30 years of practice, I have found the Board of Medical Examiners to be easy to work with in obtaining a license; and the members have the professional decision making skills, experience and clinical judgement to make medical and public safety determinations. Those decisions can't be done by a state program. The cost of licensure has been appropriate, fair and reasonable. Our professional organization, Montana Academy of Nutrition and Dietetics is currently working on addressing modernization of our licensure to include reciprocity for expediting licensure to qualified nutrition professionals; and to add Telehealth options for practice in addition to expanding and clarifying exemptions from licensure requirements. If this bill is signed into law in 2023, it will increase efficiency and mobility supporting the department's goals. In my opinion, the licensure system is working and shouldn't be taken away especially from a public safety standpoint. Nutritional therapy especially when it comes to medical nutrition therapy needs to be administered by certified and licensed professionals.

**Please provide your first and last name** Katheryn Bark

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232535  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

DRAFT IMASLA Chapter Comments for August 31 Teleconference||On behalf of the Idaho/Montana Chapter of the American Society of Landscape Architects (IMASLA), I am pleased to submit the following comments for consideration for the upcoming Montana Department of Labor and Industry (DLI) Informational Sessions. ||Licensed in 51 U.S. jurisdictions, landscape architects are design professionals who analyze, plan, design, and manage the built and natural environments. We create well-planned livable communities, leading the way in creating neighborhood master plans, managing stormwater, designing cutting-edge parks and other outdoor spaces, planning complex multimodal transportation corridors, preparing for, and recovering from the impacts of natural disasters, and more.||Our comments provided below are structured to respond to the Department's three primary areas of reform and noted areas of emphasis.||Restructuring Board Governance|We understand from conversations with the administration, that there is not a movement to change the structure of the Board of Architects and Landscape Architects. We agree that no changes are needed. As noted in our comments below, we fully support the current joint board and believe that it operates in an effective and efficient manner. ||Determine what professions are better managed as programs or through voluntary certification rather than investing in full board infrastructure|The IMASLA strongly supports the continuation of the current Board of Architects and Landscape Architects and its important role and responsibilities of protecting the public by establishing responsible licensing standards, ensuring compliance with those standards, and sanctioning bad actors. ||There are no private national organizations who provide voluntary certification for landscape architects. Because of the health, safety, and welfare impact of the profession, all 50 States and the District of Columbia license landscape architects. ||Review where multiple boards may be combined|In 2007, the previously independent landscape architect and architect boards were combined to create the joint Board of Architects and Landscape Architects. The new joint board has done impressive work and has succeeded in reducing barriers and improving the state licensure process for landscape architects through modernizing the state statute, approving multiple pathways into the profession, improving mobility by implementing board administrative approval of routine applications, and reducing fees.||Evaluate board composition for number of appointees, terms of service, qualifications, and conflicts of interest in addition to standardizing these processes across all boards to promote additional efficiencies|We appreciate the opportunity to review the various aspects of the board and make recommendations for change. However, upon reviewing the make-up, terms of service, and qualifications required to serve as a board member, IMASLA believes the current structure is working well and recommends no changes at this time. ||Modernizing Licensing Laws|Modernize and standardize language to reduce redundancies, ensure sound licensing practices, and remove obsolete language|Significant updates to modernize the language, minimize red tape, and reduce redundancies and obsolete language in the landscape architect statute were completed in 2005, 2007, and 2009. After once again reviewing the statute language under the guidance of this initiative, no

other updates are recommended at this time. ||Review legal-technical language to minimize unnecessary red tape|Please see comments above.||Increasing License Mobility & Processing Efficiency|Strengthen the Department's ability to recognize licenses issued in another state when those licensing requirements are substantially equal to Montana's requirements||The landscape architect profession has a strong mobility model with substantially equivalent education, experience, and examination requirements nationwide. In terms of processing applications, the Board of Architects and Landscape Architects has already deployed administrative approval of routine applicants who hold Council of Landscape Architectural Registration Boards Council Records (CLARB Record), which has increased efficiencies and improved the application to approval turnaround times. ||However, we would suggest a regulatory change to improve the application process for individuals who are applying for ""Licensure by Endorsement"" without a CLARB Record. Montana considers these out-of-state licensed applicants as ""non-routine"" applicants and therefore approval may take up to 120 days. The solution is to align the state's rules with the profession's recently updated CLARB Model Law and Regulations. The Model Law and Regulations suggests an out-of-state licensee should only need to provide evidence to a board of holding an out-of-state license in ""Good Standing."" The current Montana rules require duplicative administrative verifications, which can be seen as burdensome. Aligning Montana's rules with the profession's best practice for endorsement would provide ""non-routine"" Montana applicants a decision on licensure much quicker than 120 days.||Expand license exemptions for military spouses|Currently there are no exemptions for military spouses. Given the health, safety, and welfare impact of the profession, coupled with the efficient and effective licensure application process, IMASLA believes all landscape architects should be licensed.||Address licensing delays created by fingerprint background checks|Not applicable to landscape architects.||Increase availability and duration of temporary licenses|Temporary licenses are not offered to landscape architects at this time.||Standardize continuing education|While continuing education for landscape architects is required in 37 states and the District of Columbia, it is not required in Montana at this time. ||Again, we appreciate the opportunity this initiative afforded to review the current landscape architecture statute, regulations, and board in order to offer opportunities for improvement. As described above, for the most part the statute and regulations are up to date and provide the board the resources and authority it needs to ensure an effective and efficient licensure process. Should you have any questions about our comments and recommendations, please do not hesitate to contact me, the IMASLA Chapter President, maggieclarkpla@gmail.com or 406-490-7610 or our Eastern Montana Section Chair Erik Sweet at esweet@sandersonstewart.com or 406-869-3344.]

Please provide your first and last name Maggie Clark

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Unique ID: 1052232536  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Bankers across the state are expressing concern and frustration with the shortage of real estate appraisers, especially in rural areas. The process for becoming a certified appraiser is lengthy, costly, and seems ""protective"" in terms of encouraging/allowing entry to the profession. The Board of Appraisers even presents an appearance of a ""guild,"" occupation. Does the Board serve any legitimate function, and if so, should it be reconfigured with third party representation, such as real estate brokers, residential lenders, etc?

**Please provide your first and last name** Cary Hegreberg

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232537  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

On behalf of the American Society of Landscape Architects (ASLA), I want to express our appreciation for the opportunity to submit comments for consideration at the upcoming Montana Department of Labor and Industry (DLI) Informational Sessions. The comments below provide ASLA National's perspective of the functioning of the Board of Architects and Landscape Architects, a summary of the state's alignment with the professions' Model Law and Regulations, as well as a suggestion for improving the endorsement process for non-routine applicants. ||Founded in 1899, ASLA is the professional association for landscape architects in the United States, representing 15,000 members, with chapters in all 50 states and the District of Columbia. Licensed in 51 U.S. jurisdictions, landscape architects are design professionals, who focus on sustainable development, transportation planning and design, natural resource preservation, recreation spaces, water conservation, livable communities, and most importantly, public safety. It is the landscape architect's responsibility to ensure the public is protected through designs that create healthy, safe, and resilient natural and built environments. ||As an interested party in the profession's regulation, ASLA supports professional licensing laws and regulations that afford predictability, efficiency, and enhanced trust in the profession. In particular, ASLA supports and encourages consistent and rigorous professional requirements for education, experience, and examination. Consistency of education, experience, and examination requirements, in states across the country is critical to facilitating mobility and to ensuring professional competency that protects the health, safety, and welfare of the public. ||Helping to guide best practices for the profession is the Council of Landscape Architectural Registration Boards (CLARB). CLARB, whose members consist of state landscape architecture licensing boards, recently adopted updated Model Laws and Regulations for Landscape Architecture. These model documents provide policy guidance to licensing boards with the goal of achieving consistent licensure requirements across the United States, thereby improving the landscape architecture mobility model, and providing for increased equity and access to practice. ||Landscape Architecture Licensing Board Effectiveness and Efficiencies:|We recognize that one of the primary areas of reform is focused on board governance, particularly on professions where multiple boards may be combined to increase efficiencies. The Landscape Architecture profession is well acquainted with the joint board governance structure. Currently, there are 22 states who regulate Landscape Architecture through a joint licensing board - including Montana. In 2007, the previously independent landscape architect and architect boards were combined to create the joint Board of Architects and Landscape Architects. Based on the profession's feedback, the joint Board of Architects and Landscape Architects has been successful in its duties and effectiveness and actively seeks out regulatory modernization efforts that can reduce professional licensure barriers. ||Montana's Alignment with Landscape Architecture Model Law and Regulations:|Montana's Landscape Architecture rules for education, experience, and examination are substantially equivalent with all other 50 U.S. jurisdictions that license landscape architects. Additionally, Montana's education, experience, and

examination requirements closely align with the profession's Model Law & Regulation best practices for state licensing boards. Furthermore, as recommended in the Model Law and Regulations, Montana had already taken action to reduce barriers and increase access into the profession by having established alternative educational pathways. Currently nearly 95% of all licensed landscape architects hold accredited degrees in landscape architecture. Nevertheless, ASLA encourages the inclusion of alternative educational pathways and supports the current Montana rules that offer pathways for those, who for one reason or another, may not have had the resources to pursue an accredited degree in landscape architecture but still wish to become a landscape architect. We applaud the state and the licensing board for having already established this responsible and modernized landscape architecture licensing standard. Equally as important, Montana's well-defined professional licensing standards supports a mobility and reciprocity system that works well for landscape architects. Montana's past efforts to advance consistent Landscape Architecture licensing standards allows out-of-state landscape architects an opportunity to easily obtain a Montana endorsement license. Additionally, we applaud Montana for allowing administrative approval of routine applicants who hold a Council of Landscape Architectural Registration Boards Council Record (CLARB Record). Authorizing licensing board staff to administratively approve routine applications has increased board efficiencies and improved the application to approval turnaround times for prospective licensees. The Landscape Architecture profession has a proven mobility system that works across the country, and Montana has helped play a part in making it so.

**Problem/Solution for "Non-Routine" Endorsement Applicants:** While the Board of Architects and Landscape Architects should be credited for operating in an effective and efficient manner, we do believe there is room for improvement in the "Licensure by Endorsement" process for "non-routine" applicants. Individuals who are applying for "Licensure by Endorsement" without a CLARB Record are considered "non-routine" and therefore approval may take up to 120 days. We believe the current Montana rules requiring duplicative administrative verifications of these "non-routine" applications are burdensome to applicants and unnecessarily time-consuming for board staff. CLARB's Model Law recommends that applicants who are licensed and in "good standing" to practice landscape architecture under the laws of another jurisdiction be granted an endorsement license with minimal burdens. We, therefore, recommend the DLI and the Board of Architects and Landscape Architects consider regulatory changes to improve the application process for individuals who are applying for "Licensure by Endorsement" without a CLARB Record. A more efficient application process for this set of individuals would also reduce the need for 120 days for review and approval. Once again, thank you for the opportunity to provide comments for Department of Labor and Industry (DLI) Informational Sessions. Aside from the minor suggested improvement above, from the national viewpoint, Montana's landscape architecture board, along with the professions' rules and regulations, are well-functioning, efficient, and enhance the profession's mobility. Should you have any questions about our comments

or need additional information, please feel free to contact me at [ehebron@asla.org](mailto:ehebron@asla.org) or 202-216-2324. |

Please provide your first and last name Elizabeth Hebron

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Comment Submissions - COPY  
December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have been employed at my healthcare facility for 19 years, 15 of those as a registered nurse, approximately 6 of those years as a cardiac clinical supervisor. [REDACTED]

[REDACTED]

Additionally, she had made mention to other instances that make one wonder, where is the division between diagnosis, monitoring, and practice.

[REDACTED] The above referenced situation is not the only situation I am privy to as many states throughout the country contain the same fragmented process for state licensed employees. The current framework and processes must be changed to allow safe registered nurses to provide continued, appropriate, and safe care to our patients. |

**Please provide your first and last name** Jade Schultz

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Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I can appreciate that the Mt BBH requires some suicide prevention education for continuing education for LCPC licensure. However, requiring 2 CEUs each year is a ridiculous burden. There are not significant informational breakthroughs each year. There are very few 2 credit suicide prevention education opportunities that are meaningful. It would be more reasonable to require 10 CEUs of suicide prevention education every 5 years.

**Please provide your first and last name**

Steven Zieglowsky

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232541  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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24.174.823 (6) Centralized Prescription Filling and Processing of Drug Orders states ""All central filling or processing of prescription drug orders must be completed in a licensed pharmacy."" With the growth of telemedicine & remote hospital pharmacy service, many states have taken a stance that hospital orders can be processed remotely in a work from home setting vs. having to be done within a licensed pharmacy. I respectfully request that Montana consider allowing the same.

**Please provide your first and last name**

Jeremy Mueller

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232542  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The Montana Crane license program is outdated, dangerous and does not meet industry standards. The fact you can test for a tower crane license using an extendable boom forklift is terrifying. The solution is simple, leave the Montana crane license in place and as a requirement to operate cranes in Montana, but to be eligible to receive a state crane license the operator needs to hold a valid, third party accredited and industry recognized certification. This would also make the state compliant with OSHA's Final rule for cranes that went into effect Nov. 10th 2018.

**Please provide your first and last name** Hayden Lohr

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232543  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hello,||I am a licensed mortician, crematory tech here in Montana. I am responsible for the hiring, training, and education of many intern, tech, and mortician licensees. Our Board of funeral Service, is in need of help. This last three weeks I have called at least 5 times, only to be put on hold before never getting anyone to answer. I have personally made three trips up to the board offices and had three different people tell me the person that handles this is on vacation. There is not a single person there that has been able to answer basic questions regarding a 'transfer of internship'" and a 'transfer of ownership'" question. I have been told to reference the Montana Code. I said all times I am aware of the code I am just wanting to confirm the newspaper notices are correct, because of the costs associated with the newspaper. My deadline has come and gone today and I had no choice to run the notices. I hope they are correct so I might not have to re-run hundreds of dollars worth of notices. No support whatsoever for our licensees!||Solution: Cross training in the department. Better phone etiquette to have redundant answering. Clearing up some verbiage of the Montana code. Examples of what notices should look like. More effort from DPHHS for the smaller boards that are very unique, funeral services is a stand alone industry that is not, healthcare, salons, etc., being we need someone oversite people that have some idea of the concerns we are facing.

**Please provide your first and last name** Mikel Stevenson

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232544  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Something should be done as to informing Salon and business owners about required licensing prior to their investments in renovations etc. I know several small business owners who have gotten to the point of opening their doors for business and then had to wait and complete a few more things in order to become a licensed business, salons and other. This should either be required information of Real Estate or Landlords before they are allowed to sell or rent spaces they know their client is looking at.

**Please provide your first and last name**

Roberta Beute

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Submission Time: December 30, 2022 5:02 pm  
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Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for clarifying the goal of this initiative. I think the licensing of professionals is vast and healthcare licensees should be held to a different standard. I would love more examples of specific ideas to address the allied and healthcare licenses and what ""updating and streamling"" really entails. In future session if we have examples then comments can be mores specific and helpful.

**Please provide your first and last name**

Cara Bushmaker

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Landscape Architects should have their own board, with Landscape Architects and maintain licensure and transfers through the CLARB Council of Landscape Architectural Review Board. The survey was carefully worded so that we really had no choice to maintain the existing architectural board.

**Please provide your first and last name**

Leslie Lowe

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232547  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The licensing fees for board of Architects and Landscape Architects should be constant for all licenses that they issue. There is no rational reason for a Landscape Architecture renewal fee of \$180 per year when the Architect fee is only \$40 per year. Please reduce the Landscape Architecture renewal fee, or find an average fee for both licenses that brings the same revenue to make the fee structure more equitable across the licenses.

**Please provide your first and last name**

Lessa Racow

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232548  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In the educational webinar I just listened to there was a hint of not licensing property managers to reduce the red tape. While I strongly support "clean up" efforts, I believe property management is a professional occupation that must remain professionally licensed with continuing education mandates to uphold knowledge and integrity. I am a licensed property manager for my husband's property management company. There are significant penalties if I should violate any fair housing laws. Where there are penalties, there must be education. Knowing that staffing is a concern, you might considering outsourcing the management of property management licensing to a 3rd party. For example: Company A processes all new licenses and has access to audit all licensed property management files to ensure we attached a valid certificate for CE credits. The licensing fee would cover the cost of the process. Previously, we had a large fund that would support this but it was absorbed into the general fund and the licensing fee was removed. I would be very interested being a part of a team working toward a solution rather than removing licensing which would add an entirely new set of problems.

**Please provide your first and last name** Chris Cichon

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232549  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I appreciate the opportunity to provide comments pertinent to licensing of addiction counselors. I work as the Chief Operations Officer of Boyd Andrew Community Services and as a board member of the Behavioral Health Alliance of Montana. A recent issue arose that I believe is wrought with red tape and represents an opportunity to make meaningful and impactful change. This issue concerns out of state residents wishing to move to Montana and take advantage of the CARE program that reimburses eligible expenses for health care workers relocating here. The challenge is license reciprocity. Our case involves a woman who has been licensed as a CADC III for seven years. The Behavioral Health Board's response to both her and I was to make application and they would review it to identify if her license will be recognized in Montana. Many months later she still does not have an answer and both she and I are frustrated by this. A lack of license reciprocity presents a barrier that I feel could easily be lifted as 48 other states have done just that. The Department of Labor and Industry staff person I spoke with acknowledged that Montana and Alaska are the only states that do not have reciprocity with this license. The employee in question let me know that she is free and clear to practice in Israel currently, but Montana does not recognize her license which seems laughable. I appreciate the CARE program because it is a tool to bring additional health care workers to Montana, but I feel that the reciprocity issue needs to be addressed because it is at odds with the CARE program which is unfortunate because behavioral health care workers are few and far between it seems as evidenced by the sheer number of vacant positions statewide. I frankly do not want health care workers who may want to move and take advantage of this program to reconsider due to concerns that his or her license may appear to them to be on shaky ground due to reciprocity issues. I would like the board to consider allowing reciprocity for addiction counselors in situations where he or she has been licensed for a period longer than one year while remaining in good standing. Thanks for your time.

**Please provide your first and last name** Dan Krause

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232550  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I was a fly fishing guide for 6 years. I understand the desire to cut red tape, but all this will do is hurt everyone involved. You will have clients coming in from out of state going with guides who do not have the necessary skills for safety and knowledge for an enjoyable experience. Small-time outfitters are going to pop up everywhere, crowding the resources. The experience will not be better for anyone. That includes both hunting and fishing.

**Please provide your first and last name** Trevor Carlson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232551  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Mt.Society of Rad Techs Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

There must be some sort of board that is made up of Imaging Professionals to oversee practice and practice issues and concerns.

**Please provide your first and last name** Jerri Doyle

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232552  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Radiation Therapy Director

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Takes too long to license radiologic technologists and students. Streamlined and quicker process for licensing radiologic technologists, including using reciprocity to temporarily license imaging professionals

**Please provide your first and last name** Jerri Doyle

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232553  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Modernizing Licensing Laws (Title 37 of Montana State Statutes)|• Modernize and standardize language to reduce redundancies, ensure sound licensing practices, and remove obsolete language|• Review legal-technical language to minimize unnecessary red tape||I am a Registered Dietitian and Licensed Nutritionist in Montana. I am also the Public Policy Committee Chair for the Montana Academy of Nutrition and Dietetics (MTAND), an affiliate of the national Academy of Nutrition and Dietetics.||Licensed Nutritionists are important members of healthcare teams and provide specialized knowledge in a variety of settings affecting Montanans. Licensure administered under the BOME is essential because it provides both public and medical oversight, and is best suited to navigate the complex work done by Licensed Nutritionists in our State and ensure public access and safety. ||However, MTAND and our profession in general in Montana recognize the need for cutting red tape and better differentiating the licensure process and scope of practice within the nutrition field. In this regard, MTAND has drafted a modernized nutrition and dietetics licensure bill to be introduced in the 2023 state legislative session. This bill is substantially similar to North Dakota Senate Bill 2187 which was passed by the state legislature and signed into law in 2021. This legislation will address many of the Red Tape issues of interest to the Governor while also protecting public safety and standardizing the requirements for different levels of practice. |

**Please provide your first and last name** Paige Sadowski

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232554  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am very much interested in working with the Dept. of Labor on this initiative and hope I can connect with Dept. of Labor leaders to assist in any way I can. I want to be involved and represent the Radiologic profession as well as make sure patients are safe during radiologic and radiation therapy procedures and treatments. I would welcome any contact or calls from Dept. of Labor and Montana government leaders wanting to reach out.|Thank you|

**Please provide your first and last name**

Jerri Doyle

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232555  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** ignore

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**Please provide your first and last name** test test

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232556  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** test

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**Please provide your first and last name** test test

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232557  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** test

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**Please provide your first and last name** test test

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232558  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** test

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**Please provide your first and last name** test test

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232559  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** test

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**Please provide your first and last name** test test

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232560  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** test

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**Please provide your first and last name** test test

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232561  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Montana State Crane license dose not meet OSHA requirements||please look up the requirements at under the Code of Federal regulations||CFR 1926.1427(c)(1)(iv) | talks about testing procedures for a State license for re-licensing|CFR 1926.1427(c)(1)(v)| says a state license cant be valid for longer than 5 years||Any state Crane License over 5 years old is not VALID.|The State is liable for any accident occurring with a state license issued to operator who is not meeting the OSHA retraining requirements. || repeat the State is liable for the action of issuing non valid licenses.

**Please provide your first and last name** Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232562  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Our licensing board, BOPTE, is very efficient in processing (2 wks or less!) what slows down providers in being able to provide care, create access to care for patients, and put providers into the Montana workforce is the insurance companies that drag their feet in credentialing. This can sometimes take up to 6 months! So we have patients that need care, we have a provider that is licensed but the insurance companies/payers are not credentialing in a reasonable amount of time. This is what needs to be looked at - this is where I want my tax dollars to go - regulate the big profit businesses in health care the providers licensing is the least of Montana's worries/red tape.

**Please provide your first and last name** samantha schmidt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232563  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Rapid Training Outreach Coordinator

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

CDL program - many of our rural MT residents (especially) in Eastern MT have been driving trucks and operating equipment since an early age. A mandatory CDL training program during such a shortage of licensed drivers makes no sense. If they can pass the test they can pass the test.

**Please provide your first and last name** Tom Anderson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232564  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I live in Lincoln county. I have in-depth electrical and electronic training from the military, but the local electricians in libby will not sign off on anyone's license paperwork. There has to be another form of certification other than local masters with an interest in controlling montana's small local markets. One guy told me if i paid him 25k he would sign whatever i wanted. I have over 15 years of in-depth laboratory electronic experience and training with 5 of that being part of a 12 year military career. I can pass any testing or certification process laid out. There has to be another way other than moving to a new area and paying off a local guy to get a master's license for someone with my level of experience.

**Please provide your first and last name** Benjamin Vaillancourt

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232565  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Dear Sirs,||I am a Physical Therapist with 18 years of experience and have come before the board once in my professional career which was handled professionally due to the integral knowledge of being assessed by my peers. We have a unique place in the medical profession as we are experts in the physical movement field. We need to have separate board staffed by PT's who know what the profession entails.

**Please provide your first and last name**

Gary Gales

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232566  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Standardize continuing education - require all licensees to complete a minimum of 25 hours of Accredited CME 1 per year. It would be best to make the mandate 50 hours per 2 years to allow flexibility for unexpected life problems with the physician. ||Review legal-technical language to minimize unnecessary red tape - Send an annual electronic bulletin to physician emails outlining the Boards expectations of physicians so they can ensure they are in alignment with professional ethics codes and practice standards. I suggest a one or two-page bullet pointed document that gives the highlights of the common mistakes the board sees it's members engage in, with links to Board-approved education for each. This is complicated stuff that the average physician does not understand fully, leaving them vulnerable to discipline as they believe they are practicing ethically and responsibly. It also leaves the patients in Montana vulnerable to an even greater physician shortage should the Board decide to revoke or suspend a licensee.

**Please provide your first and last name** Michael Thein

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232567  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

If standardizing continuing education means limiting it further to government designed programs, then I object! There is already enough limitations on what has to be approved for CEU's for massage therapists as it is.

**Please provide your first and last name** Linda Mahr

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232568  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

FUN STORY on Montana state crane license. I talked to the OSHA inspector today. The State license and OSHA requirements do not match up and guess who is going to start getting fined for it ?? The Employers !  
|Crane operators must be retested every 5 years according to OSHA. Montana state crane license only requires the initial test then its good forever. Leaving OSHA with only the employer to pay for the discrepancy if a accident happens and the operator hasn't been within 5 years. |Talk about RED TAPE

**Please provide your first and last name**

Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232569  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

PT is a medical profession that sees a high volume of direct access patients and effectively refers appropriately across the medical field. Having a licensing board is crucial for the profession's oversight. The current board is effective and has rapid turn around times. The bigger barrier to new graduates beginning work or current PTs changing jobs is the lengthily credentialing process required by insurance companies. The board is not a barrier and is a necessary protection for the public and the Physical Therapy profession.

**Please provide your first and last name**

Antara Quinones

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232570  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I agree with the following measures: Strengthen the Department's ability to recognize licenses issued in another state when those licensing requirements are substantially equal to Montana's requirements. Expand license exemptions for military spouses. Standardize continuing education I would also like to renew every two or five years rather than annually. I will add that as a member of the Board of Speech language Pathologists and Audiologists, I believe we have an excellent Executive Officer who covers several boards. We've been very fiscally responsible and have sought to be more efficient. I do believe we need a board to govern our profession as it is the best way to protect the public and it also sets a standard for professional practice.

**Please provide your first and last name**

Rachel Stansberry

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232571  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Re: Dept of Labor and Industry Red Tap Relief Initiative|Hello DLI|I am a PT practicing in MT for the past 20 years. It has come to my attention that this state organization is looking at whether or not the our profession should have their own licensing board, currently the BOPTe. I am in strong favor of having our own licensing board, as it allows our profession to be overseen and regulated by our professional peers. The BOPTe is paid for by our licensed members, so it is financially stable. Please do not get rid of this important governing body that holds our state professionals to the highest standard.

**Please provide your first and last name** Brace Hayden

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232572  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Licensing application process is extremely clunky and difficult for busy providers to navigate. Once on the EBIZ.MT.GOV/POL site there are no instructions and it does not link back to where the instructions are. It would be helpful if one of your staff who was unfamiliar with the process went through and tried to apply for a license. There are numerous glitches in the application process that would be helpful to have worked out.

**Please provide your first and last name**

Betty Cole

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232573  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Why even have a state crane license department? State crane license doesn't meet federal regulations on multiple levels. We might as well just let OSHA do the enforcement and the private sector can issue certifications that made the OSHA requirements.

**Please provide your first and last name** Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232574  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Continuing education requirements for LCPC's are ridiculous. When physicians are not ""required"" to do CEU's for licenses why are we? CEU's used to last 3 years, now they only last two? If the point of education is to change your thinking those changes certainly last longer than two or three years. LCPC's should have voluntary continuing education - we all will do it anyway - rather than being gleefully told we will now be audited every other year ""because we can do that now"" - license audits are stressful, alienating and unnecessary.

**Please provide your first and last name**

Noelle Naiden

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232575  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The 'red tape review' feel extremely partisan. ""Government Bad"" isn't a particularly useful stance, and it feels disingenuous to paint every profession with the same brush. There may be some professions that have little or no impact on public health, safety, and the environment, where DLI licensure may have little or no effect other than to serve as a 'barrier to market entry'. In other professions, such as professional engineers, for example, it is quite plain that unlicensed or unqualified professionals performing professional duties without the necessary training and understanding of the ramifications of their actions, could have a profound negative impact on the safety, health, and wellbeing of Montana citizens and its environment. To that extent, flagging something as 'needless red tape' without understanding the full impacts of a particular piece of legislation, seems to be asking for trouble. I would advocate strongly for continuing to allow professionals who understand the gravity of the decisions they are making, oversee the process for licensure. They hold an ethical and oral obligation for their profession, and are able to operate with transparency and decisiveness to protect the interests of Montana and its citizens.

**Please provide your first and last name** Syris Trahan

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232576  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Im Currently a Licensed Realtor In Montana & two Other States, (Lic Expires Every 12 Months ? ) |In other States Lic Expires Every two to Four Years, Could Montana Be Working on Extending Licensing

**Please provide your first and last name** Ed Brooks

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232577  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am currently a licensed dietitian nutritionist in Bozeman. I am licensed not only because it provides credibility, but also ensures the highest level of protection against health and safety concerns for the public. Similarly to the Board of Medical Examiners mission, the main purpose of nutrition licensing is to protect the health, safety, and welfare of Montana citizens. It is essential that the Board of Medical Examiners is in charge of the administration and management of nutrition licensing rather than a state program because BOME already has the people and policies in place to ensure that medically correct decisions are being made to protect the public's safety and wellbeing. With a state program, decision-makers may not have the medical understanding and clinical judgment to ensure that the public's health and safety are first priority.

**Please provide your first and last name** Dana Zurchin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232578  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Provisionally licensed PCLC

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I wonder if the Department thinks they are providing adequate paths to full licensure and employment for recent graduates? Would it immediately increase the pool of mental health professionals if they started supporting this group? Could a variety of roles be offered such as telemental health, part-time, and flexible hours? Is there a lot of complaining that there is a worker shortage yet very few options for workers?

**Please provide your first and last name**

Kris Keller, MS, PCLC, NCC

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232579  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I do NOT support the Red Tape Initiative that wants a combined board governing physical therapists. I want the Board of Physical Therapy Examiners to be staffed by physical therapists who understand our profession when it comes to reviewing licenses and license renewal. I am against watering down certification in MT with voluntary certification as I want my profession held accountable by physical therapist on the Board of Examiners. Lastly, finger printing with background checks is worthwhile even if it delays the certification process a little, It is important to keep the public safety in mind. Besides it only takes 2 wks to obtain a license in MT which is a satisfactory amt of time. Again I want the Board of Physical Therapy Examiners to be made up of physical therapists!

**Please provide your first and last name** Dennis McCrea

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232580  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In a previous suggestion, I had recommended that the State of Montana formally and officially designate the remaining three Licensed Public Accountants (LPAs) as Certified Public Accountants (CPAs) and explained the reasons thereof. In so doing, I had mentioned that the 2015 legislative House Bill 44 (HB44) which was signed into law by Governor Steve Bullock April 2, 2015 not only closed the LPA designation to new applicants, but also deleted all language referring to LPAs from Montana statute. ||PROBLEM:|The deleted language in HB 44 also included the deletion of LPAs from the definition of practice of public accounting, which now legally restricts the practice of public accounting to those licensed as CPAs, pursuant to Section 37-50-101(9) of the Montana Code Annotated (MCA), which could be construed as anyone other than a CPA who practices public accounting in Montana is practicing illegally, including LPAs. However, the grandfather clause in Section 37-50-318 which was enacted as a result of the passage of HB44 allows LPAs to renew and retain their licenses, but conflicts with the remainder of the bill and subsequent statutes which essentially deleted the LPA language from the MCA, save for the aforementioned section. This conflicting language can effectively be interpreted in either of two ways: (1) Because LPAs are deleted from statute but are allowed to renew their licenses and have the exact same rights and privileges as CPAs, the remaining LPAs are effectively de facto CPAs, regardless of their legal title, or (2) the remaining LPAs have been technically practicing illegally in Montana for the past 7 years because they are not legally recognized in statute by their legal title. This conflicting language is confusing to the public and therefore does not serve public interest.||SOLUTION:|While my original solution still stands to formally and officially designate the remaining LPAs as CPAs, this proposed solution serves to suggest a method to do so which could expedite this process without a necessary need for an additional legislative bill:|I would recommend that the Montana Attorney General review the 2015 HB44 to determine how the deleted LPA language impacts LPAs' legal standing as licensees. If it is determined that the law as written effectively treats LPAs as CPAs under an alternate title, then it is possible that LPAs can formally be re-titled as CPAs by executive fiat since the legislative process already essentially converted the LPAs to CPAs except by explicit change of title when the law was changed in 2015. If it is determined that LPAs have no legal standing, it is my hope that if a legislative bill is required instead of by executive order, it will serve to clean up the conflicting language by formally declaring LPAs to be CPAs and through the issuance of CPA certificates to this effect.

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**Please provide your first and last name** Jason Jones

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232581  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: My provider was affected by some of the boards policies.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The 2016 CDC opioid guidelines caused an overreaction in all entities including legislatures, insurance companies and the doctors themselves. ||The guideline has been since revised. I would like to know if the State Legislature has read it. The AMA was aggressively against any force tapering but it occurred en masse in Montana. ||Now that everyone is off it, what to do with those who are still alive. Most people who needed opioids in the first place still have untreated pain. I would suggest reintroducing the drug in smaller doses.||It can give life back to those who did nothing wrong but were put through a medical nightmare by overly aggressive tactics. ||It's time to get back to a more humane approach to medicine. People with serious illnesses should have the option of getting symptom relief.

**Please provide your first and last name** Carol Limahelu

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232582  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a professional engineer having to maintain and pay for my license I welcome a more efficient and less expensive licensing system. I believe a license is needed but I also believe changes can be made to make the process more efficient and less costly. Extending the duration of the licensing period would be welcome. The current 2-year period should be extended to 4 or more years. The renewal cost should be reduced as well.

**Please provide your first and last name** paul rieger

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232583  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Online continueing education for property managers that is year-round and not tied to only the schedule Bruno Friia's classes offer. Please also allow other qualified online classes where in person or hard core zoom presence is not required.

**Please provide your first and last name** jackie Peterson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232584  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I believe if the practice history form was included in the application it would be more stramlined.

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**Please provide your first and last name** Carlos Santos

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232585  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Im a certified Journeyman electrician in PR, worked in TN and NC with my certifications. Here it has been a struggle to get a permit for license per some requisite i already have but its not understood that im already a Journeman. I HAVEN TBEEN ABLE TO WORK!!!

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**Please provide your first and last name** Otto R Gonzalez

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232586  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Right now it takes forever for license applications to be processed and when you request additional information the time starts over even if the information requested is sent directly to the person processing your application. It is very frustrating to have to resubmit an item that was sent to you guys months ago and have to continue to wait 10 business days for them to process while other people can go into your office and have their application processed while they are in the office.

**Please provide your first and last name**

Paige Thomas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232587  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Performing a dermaplane services as a licensed Esthetician without being under a physician. Other states have allowed this to be a treatment done by a licensed esthetician without supervision.

**Please provide your first and last name** Sonja Wagner

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232588  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Operating a home business as an esthetician. Making this option more feasible without all of the salon requirements. If mobile salons have been passed, there should be an easier option to create a home office.

**Please provide your first and last name** Sonja Wagner

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232589  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In the Title 37 Reform document, page 314, under 37-66-105 (2), it is proposed to remove the regulation that an unlicensed person may not use the title "landscape architect" etc. ||This will result in a reduced value of the profession and will mislead the public, resulting in harm to health, safety, and welfare. Landscape architects do not just do planting plans - they are architects for outdoor spaces, many of which are publicly owned and used by the general public. By allowing any individual to use the title of "landscape architect", you are allowing these types of projects to be designed by people who are not professionally trained and licensed in very serious matters related to health, safety, and welfare. ||Landscape architects design streetscapes (including ADA ramps and accessibility features), stairs, overlooks, sidewalks, trails, playgrounds, sports fields, cemeteries, decks, pergolas, parking lots, and more. These items need to be designed by licensed professionals to protect the safety of the public, and by allowing any unlicensed individual to use the "landscape architect" title, the state is creating a lack of oversight that will ultimately result in public harm.

**Please provide your first and last name** Jessica Holdren

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232590  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board-Consistency.docx, Section 29, page 42 & 43. Landscape Architects should have equal representation on this board to Architects, as it is a board representing both professions. The current draft does not provide for equitable representation. I suggest the following revisions, in order of my preference:|1. Reduce the board to five members, and eliminate the academic architect (1.2.b.)\*|2. Increasing the board to seven members, and add a third landscape architect (1.2.d)||\*Note: I see no need for an academic architect to sit on the board at all, if that person is not directly representative of the architecture program in the State of Montana (currently MSU Bozeman is the only program). So either keep this as it was before the draft, or if the position is too difficult to fill, eliminate this position entirely.

**Please provide your first and last name** Lessa Racow

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232591  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency.dox, section 15, page 23. You may not be aware, but the transgressions of the hearing aid dispensers in MT have been so egregious that this board alone has partnered with the Montana DOJ resulting in criminal prosecutions on many occasions over the years. This was after one of the larger chains of hearing aid dispensers shut down the board several years in a row by draining all of their funds through prolonged legal disputes. MT has a law stating that any board who uses all their funds must shut down. If you allow the vote to always be 3 vs 2, with three hearing aid dispensers vs two public appointees, then you will have once again given the hearing aid dispensers free reign over MT and your constituents. Keep in mind that in state after state (except WA who requires two years of college for a HAD license), the HAD board is the most costly and most litigated board in the state. There are reasons your constituents are constantly filing complaints and the board currently is both litigating and referring hearing aid dispensers to the DOJ. If you're going to change anything, reduce the number of hearing aid dispensers to two, and mandate that people who understand hearing such as audiologists, speech pathologists, or ENT's fill at least two of the remaining positions. Otherwise, you have let the fox loose in the hen house. I am not for regulation unless the lack of it leads directly to personal injury and financial destitution. We as MT audiologists created the HAD board long ago to prevent predatory practices which we witnessed when HAD from ND, SD, and ID would cross the borders to prey on MT's citizens. Hearing aid dispensers in MT were unlicensed at the time, and we thought it was better to pay the price of giving them some legitimacy through licensure than to allow our fellow citizens to be taken advantage of with no recourse. We have watched over the years and the hearing aid dispensers have watered down the regulations we put in place to help our people and try to keep the hearing aid dispensers in check. ||Hearing aid dispensers as a group are relentless in their desire to avoid any type of regulation or prosecution. Do the right thing and protect our MT residents.

**Please provide your first and last name** Will Helton

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232592  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please Allow NPs who are board certified by an accredited Board- ANCC for example |To be licensed automatically in MT for the 5 year period of their Certifying Board.|My second suggestion is to allow NPs and RNs and LPNs to be Licensed for 5 years |Consider Longer Licenses for other professions.

**Please provide your first and last name**

Constance Morrison JD MBA DNP MS ARNP PMHNP-BC FAANP

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232593  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am in opposition of the rewriting of Title 37, Section 182. The omission/removal of ""However, an unlicensed person may not use the title ""landscape architect"", ""landscape architecture"", or any description tending to convey the impression that the person is a licensed landscape architect unless the person is licensed as provided in this chapter."" removes any regulatory requirement to hire licensed landscape architects. The exceptions of this code section essentially remove any professional protection for both practicing professionals, but also the State in allowing work that affects the human health, safety, and welfare of the general public to be conducted by professionals unqualified to provide such services.|| I am also in opposition of the removal of licensure requirements for architects and landscape architects sitting on the Board of architects and landscape architects as stated in the proposed language for Section 29. Section 2-15-1761. This removes any professional qualification threshold for those responsible of overseeing licensure in the State.|||

**Please provide your first and last name** Eric J Berg

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232594  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Title-37-reform|Section 183, 37-66-301 pg. 314||I oppose removing the language about unlicensed persons using the title "'Landscape Architect or Landscape Architecture'". Doing so will allow landscape contractors, landscape designers, and other illegitimate untrained and uneducated persons, to falsely advertise to be a Landscape Architect or provide Landscape Architecture services in order to gain our business, effectively putting legitimate Landscape Architects and Landscape Architecture firms out of business. In addition, removing the title act will endanger the health, safety, and welfare of the public. ||

**Please provide your first and last name** Lessa Racow

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232595  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a nationally licensed crane operator and the state of Montana gives reciprocity to my national license. I would propose a change in that the state would recognize the national license without charging me \$150 annually to renew my Montana state hoisting license. Thank you

**Please provide your first and last name** David Colton

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232596  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft: Board Consistency|Section: Appointment - terms Number 2|Comments: Should remove the portion that states the Governor can remove a board member with NO cause. The Governor should have to have cause. Stating the governor can remove someone with or without cause is too much power. The Psychology Board should also consider joining PSYPACT that would allow license portability.

**Please provide your first and last name**

Megan Hunsaker

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232597  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This agency is redundant. The rules are already in place through laboratory regulations CLIA. They add no value to the process of hiring or retaining qualified technologists. They are a petty group of authoritarians who harass and drive away workers. Like me. I was threatened with legal penalties after having my license only 3 months. Then I paid a penalty to renew after only 6 months. Then two months later, I was audited. My license will be suspended on October 17th. I will not return to this state until this agency is disbanded. Everyone hates them. Hospitals find them burdensome, and professionals in my lab agree that they only service themselves.

**Please provide your first and last name**

Heather Yarbrough

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232598  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I do not see the profession: Nurse Practitioner. We are under the Montana State Board of Nursing and should remain under Nursing. Please do not put us under a combined board, especially under the Medical Board who has tried to control nursing in the past and will continue to try in the future.

**Please provide your first and last name**

Cathy Mitchell

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232599  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Since Montana dropped the Montana optional EMT Exam and now follow NREMT, we have taken a step backwards. Montana used to lead the nation in EMS, now we are following standards from a private company in Ohio. Why are we under the control of a company that does not offer training nor is a license. We need someone in the Department who cares about EMS. The NREMT only allows accredited schools to teach Paramedics or they aren't allowed to test. It is a shame that as volunteers don't have any support. We have stepped back 20 years, instead of improving. The NREMT requires attendance not proof of skills. Nothing about assessment in requirements to prove an EMT can actually do a life saving skill. I hope it isn't YOUR LOVED ONES THAT NEED HELP when unqualified people show up at your emergency. We need a Medical director and a training coordinato

**Please provide your first and last name** Roberta Threet

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232601  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please dont waste our time responding to drafts. Tell us where you want to go with the changes and we will respond. My input as a licensed professional land surveyor since 1985 is that our Board of Registration is doing our profession a huge disservice by not evoking the license of a mega bad-apple surveyor in the Flathead who has been brought before the BOR several times and has had MANY taxpayer/client complaint letters sent to the BOR as well. The result of these heinous acts by this surveyor and the BOR inaction to discipline him are a disgrace to our beloved profession.

**Please provide your first and last name**

Richard Goacher

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232602  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

EMAIL NOTIFICATIONS to manp@montanand.org||Hello, I attended the previous listening session and am subscribed to the interested parties list of the Board of Alternative Health Care, and received your email, Date: Wed, Aug 17, 2022 at 1:22 PM|Subject: Mark Your Calendar: Department of Labor & Industry's Professional Licensing Informational & Listening Sessions on Potential 2023 Legislative Changes||but we did not receive the email notification:|Date: On Mon, Sep 19, 2022 at 4:16 PM|Subject: Fwd: Drafts Released and Open for Comment on Red Tape Reduction for Licensing||Thank you for your assistance.

**Please provide your first and last name** Ingrid Lovitt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232603  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hello, I am in favor of being efficient. When it comes to obtaining and holding a professional license, we all take it seriously and take pride in our CE classes and required educational processes. Reducing red tape, or giving breaks to military spouses.. or making these boards voluntary and standarizing tests, CE classes, etc, seems like short cutting the process, and also forcing unprofessional people even from other states into professions that are simply unqualified. |If someone is interested in being a licensed professional in the state of Montana they will go through all the testing they need, even taking it as many times as necessary. |Just because they are licensed in the state of Idaho should not mean they can automatically be licensed here. In idaho for example, their property managers do not have to obtain a license to operate property management. Montana testing and CE classes are managed great. The Board of Realty and Regulation should not be run by volunteers and neither should military spouses be given special treatment, they should have to go through the same as everyone else. |This all seems like a cost cutting method of reducing red tape, and also being lenient in licensee holders.. The next thing that may happen is a moral and ethical breakdown collapse in business.

**Please provide your first and last name** Suzy Schweikert

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232604  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Eliminate the need for NPDB verification if the company is properly registered with the Secretary of State. The NPDB check provides no added value and can tie up the licensing process for months.

**Please provide your first and last name**

MaryLou Schoonover

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232605  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** gukgiuguguli

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**Please provide your first and last name** ggkjg ghgkkjg

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232606  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

licensing is a competency issue, if you wish to waive anything for a military spouse, it should only be the fee, not the proof of competency .

**Please provide your first and last name** Cory Hasiak

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232607  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In conjunction with the 'Title 37 - Reform' document, also consider repealing MCA 37-67-328 (add to 'Repealer' provisions). The requirement for firms to obtain an annual Certificate of Authority to provide engineering services has no meaningful qualification requirements to further protect the public. It is redundant and unnecessary given licensing requirements for Professional Engineers, and just seems like a way to enhance revenues by adding fees. Thanks for your consideration.

**Please provide your first and last name**

Alden Beard

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232608  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board consistency reform draft: I feel there should be term limits for board members. I also feel the members of the board should be practicing in Montana.

**Please provide your first and last name** Nicole Crawford

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232609  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

1) (2) The governor shall have the authority to remove members of the board with or without cause: Dismissal without cause can potentially become a tool suppress novel ideas which are at the cutting edge and therefore uncomfortable to the majority.||2) (a) be a resident of this state and at least 18 years of age: This will remove many experienced physicians who are members of Organizations such as AMA, American Academy of Neurology and has the most up to date knowledge of the issues that are actively affecting patient care throughout the Nation due to physician shortages in all fields and especially in Neurology, Psychiatry, Geriatrics, given the ageing population, and Pediatrics. Meetings are easily being held via Zoom and other virtual meeting platforms. Exclusion of the expertise of the physicians from these organizations will make the state of Montana always catching up rather than being always current.||3) (1) The department shall issue a license within 45 days of receiving a complete, routine application: In the current environment where there is a shortage of physicians and the Nation has an ageing population with Telemedicine becoming increasingly important and integral part of medical practice especially for States such as Montana and rural areas this requirement will have the most adverse effect on the most vulnerable people, the patients. The Veterans Affairs Medical System provides a paradigm to help with this problem. Acceptance of an active and unrestricted medical license from any State to immediately issue a temporary license while the State conducts it's own licensing process will help both the providers and the patients especially with Telemedicine. The other states are continuously monitoring the licenses every time it is renewed and the requirements for renewal are essentially uniform throughout the country. ||4) a criminal background check by the Montana department of justice and the federal bureau of investigation as a prerequisite to the issuance or renewal of a license: This is redundant as any state where the provider has an active and unrestricted license has already done criminal background check and if every other state makes this a requirement then it puts both financial and clinical practice delays. The impact of this requirement is especially important to consider given that Telemedicine is increasingly becoming a major part of the practice of medicine in the country and requires having licensure in multiple states. Some of the states where there is no shortage of physicians are already attempting to pass legislation to restrict the practice of the providers, who live in those states and are licensed, to not provide either Locum Tenens and/or Telemedicine coverage in those states that are experiencing various degrees of physician shortages. ||5) A final thought is related to hospital credentialing within the State. In states with physician shortages making the hospitals go through a prolonged credentialing process as required by that state will discourage providers from applying to multiple hospitals, each with it's own credentialing process, and thereby prevent and/or create unnecessary delays in patient care through Locum Tenens and Telemedicine in particular. There is already the Office of Professional Medical Conduct and the National Physician Data Bank besides the state where the physician holds an active and unrestricted medical license for each state and each hospital within that state to have it's own procedures which will most affect the patients and

their care. Also, physicians who have Board Certification have a minimum number of CME every year to keep their Certification in good standing and adding more CME by each state and each hospital in that state is redundant for licensing and credentialing. ||Thank you, Mustafa.

Please provide your first and last name Mustafa Khan

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232610  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Can we bring back the educational study courses that the State of Montana held in the past to support those struggling to take licensing exams--whether it is zoom or in person. I know in other States across the Nation--the Boards hold specific courses/seminars throughout the year on various test topics to help those needing to test prepare or learn how to analyze the test questions. Florida has a panel of professionals at their board with the sole purpose of helping those close to their five year mark get over that hurdle--some feel that it is the clinical supervisor that should maintain this role, but gaining outside perspectives can be very useful. I know I don't study or retain information the same way as a my clinical supervisor--have a group share option may benefit a larger number of social workers seeking to become licensed. The exam is challenging--some excel in the field but are not the best test takers and need test support. I have plans to go out of Montana for test support to Portland, Oregon because Montana does not offer the test preparation options needed.

**Please provide your first and last name** Shannon Hines

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232611  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Why are you requiring a social security number? The SSNs were never meant to be identifiers, and it seems unnecessary for you to collect them.  
|New section 4 - Why isn't the board of medical examiners included in this?  
Why would that group of licensees have different statutes?

**Please provide your first and last name** Jill Caldwell

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232612  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Other: test

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Test Test Test Test Test

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**Please provide your first and last name** SACA GAWEA

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232613  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

A general concern that I have removal of requirements that board members should work, live and have a history of the profession in the state of Montana. It seems to me that a board member should at least have a history of professional work in Montana to adequately assess qualifications with regard to the environment in which they live. I can envision a host of problems in dealing with members that don't have a dog in the fight.

**Please provide your first and last name**

Robert Marvin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232614  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Cease asking questions about behavioral health that reach back to one's birth! A relevant question is "currently struggling with mental health diagnosis". Ask "if ever" places a professional in an impossible position and further hides and stigmatizes mental health. Ask about malpractice claims "since the last license renewal". The overwhelming number of malpractice claims ARE NOT representative of a bad practice of medicine, are settled, and are not relevant to a competent practice of medicine. A physician should not have to report a settled malpractice claim for the rest of her/his career with every renewal cycle.

**Please provide your first and last name** Doyle Coleman

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232615  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency Reform ?NEW SECTION. Section Appointment - Qualifications - Terms |This is way too much authority for the governor to have. The board shouldn't be selected based on political party and removed at the whim of the governor.

**Please provide your first and last name** Theresa Pfaff

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232616  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I work at a veterinarian clinic and i am wondering if the medical facilities get a drug seeker list? Veterinarian offices should also get a use so we know who not do dispense certaon medications too incase they are using their pets for an excuse to get medications.

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**Please provide your first and last name** Larisa Neiffer

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232617  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Important information regarding requirements of licensure that are sent to the licensing staff should be sent to a portal or pool that is accessible to more than just one staff person, and therefore cannot be lost should that person leave employment. Those seeking licensure should not be penalized for this occurrence. ||More staff and more competent staff should be hired and trained. ||Standards should be upheld regarding timely return communication with those seeking licensure. ||Steps of licensure should be clearly communicated in multiple places for those seeking licensure. ||Fees for renewal of a candidates license should be waived if that person has submitted all materials for full licensure and is only waiting on the board's response for full licensure.

**Please provide your first and last name**

Danielle Standley

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232618  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

There must be the term ""certifying examination"" in Title 37 for Clinical Laboratory Science. There must still be a licensing requirement for professionals (who have the equivalent of a working Masters Degree) to practice Clinical Laboratory Science.

**Please provide your first and last name** Max Mauch

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232619  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Electrician

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Apparently who ever checks for the paper work to recognize the validity of ones certifications, courses, and hours for accreditation doesnt really comprehend the National Electrical Code, the Guidelines that prove one to be a competent electrician by local jurisdiction taking in consideration, hours of actual work, courses as in classes and in person handson validation of said above competent individuals for the task. I cannot start an apprenticeship in this state just because. I have spent years growing in my trade, career. This doesnt make any sense. I have already been licensed as a Journeman and have worked in other two states, with my proof of Apprenticeship (COMPLETED because you cant take a Journeymans TEST if not approved and recognized as COMPETENT), and Journeyman.

**Please provide your first and last name**

Otto R Gonzalez

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232620  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current Montana Professional Licensing Board Member

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Greetings,||I am respectfully submitting my comments on my own behalf, however for transparency I am the current President of the Montana Board of Chiropractors. We have not had a meeting during comment period to formally submit comments, these are my opinions based on my experiences. | Please see the redlined 37-12-302 from page 144 of draft 1 for reference. In plain vernacular currently to be licensed as a chiropractor in Montana we must have a bachelor's degree from an accredited college or university if we graduated after 1995; a Doctor of Chiropractic degree from an accredited chiropractic college or university and pass our national board examinations. The proposed language changes that to only requiring a bachelor's degree from an accredited chiropractic school OR other NATIONALLY accredited college or university and still pass our national boards. |I take issue with a few things here. First you have removed the requirement to have a Doctor of Chiropractic degree. I'm not sure where to even begin to voice my displeasure that my human biology degree from the chiropractic school I went to would be enough to drop out of school early and practice chiropractic in the state of Montana (assuming national boards could be passed). Second the wording for the bachelor's degree changed to a nationally accredited college as approved by board rule. Two of my last three interns had bachelor's degrees from Montana State University-Billings which is accredited by the Northwest Commission of Colleges and Universities. Their website for reference is nwccu.org. The NWCCU is a regional accreditation body which is recognized by the United States Department of Education (USDE) and the Council on Higher Education Accreditation (CHEA). This does not meet the criteria of a national accrediting body for a bachelor's degree because that does not exist. There are several regional groups similar to NWCCU that are recognized by the USDE and CHEA but the national USDE and CHEA are not in and of themselves accrediting bodies. Furthermore, you have dropped the grandfathering of the bachelor's degree requirement for people graduating prior to 1995 which is when this became rule to my understanding. |As a board member we are constantly asked for safety to public, fiscal impact notes and to be conscious of restraint of trade as in the North Carolina dental case. I don't believe dropping the requirement of a doctor of chiropractic degree promotes the public safety of Montanans. I do believe that there is a significant fiscal impact in the neighborhood of \$250,000 to affected new graduates if they got their bachelors degree from a school such as MSU-B prior to entering chiropractic school and are told upon applying for licensure that doesn't meet the criteria of national accreditation for their bachelor's degree. As I stated earlier two of my last three interns this would have applied to and would have kept them from returning home to Montana. As far as grandfathering people who graduated in 1995, that's a doctor who is about 52-53 years old who would want to move here, or retire here with a part time practice and we have seen many of those in the past couple of years moving since covid shut downs in other states. These doctors have 25 to 30 years of experience and have 15 years or so of service left to give to the citizens of Montana. Between limiting the new graduates and the experienced doctors who can move to Montana I feel that this could be considered restraint of trade as it

would be limiting the competition to the professional board members who serve on the board of chiropractors (as well as all chiropractors in the state) and this is something that we have been told to be especially careful of. I understand that the department is trying to standardize languages but I believe we have missed the mark here, I'd like to stress the current requirements in the section remain the same if the legal language needs to change I'm ok with that. So in essence we need 1) a Doctor of Chiropractic Degree 2) a bachelors degree if we graduated after 1995 3) pass the national boards (in plain english). Thank you for your time and consideration, Marcus Nynas, DC, FICC, GTS, TPI Medical 2, SFMA President of Montana Board of Chiropractors - not speaking on their behalf

Please provide your first and last name Marcus Nynas

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232621  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Electrician. They look ok but real red tape issue is with work comp exemption. Why you have to jump through a stupid amount of hoops every 2 years to prove you are a business is ridiculous. Owner and family members should be automatically exempt if they want. Should be no paperwork at all.

**Please provide your first and last name** Dean DeSilva

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232622  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Discarding the current state board of sanitarians should not be further considered. ||Reliance exclusively on a single or multiple private organizations for professional credentialing would endanger workforce competency while undermining state sovereignty and opening corruption opportunities.

**Please provide your first and last name** Jeffrey Havens

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232623  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I appreciate the efforts to streamline the licensing laws. Here is a request about communication with the agency: The agency provides a straightforward process by which a potential licensee can get a personal response about their status. If a designated person(s) is required to respond to all inquiries (within a specific time frame), it would significantly reduce the sense of powerlessness a potential licensee experiences. Thank you for considering.

**Please provide your first and last name**

Carol Maker

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232624  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Concerning Board Consistency pg. 37-38. I observe no need for the Board of Clinical Laboratory Science Practitioners due to redundancy. Laboratory Scientists/Technologists are already licensed through national accrediting agencies such as the ASCP, in which licensing is obtained and renewed after a set time (typically after 3 years). With that in mind, I see no need for the Montana Board to add to the burden of licensure onto already licensed professionals according to regulations such as found in Title 37 Reform 37-1-141, 37-1-304, and 37-1-134. Laboratories are already inspected to determine the competency of the personnel by other agencies such as CLIA. Therefore, there is no need for the Montana Board of Clinical Laboratory Science Practitioners to add to the burden of Lab professionals and State Government alike. This Board may have the best of intentions, but many efforts even with the best of intentions, are harmful.

**Please provide your first and last name** Clay Robertson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232625  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Allow out of state licenses for civil engineers and land surveyors to obtain Montana licenses with an application.

**Please provide your first and last name** Loren Culp

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232626  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comments relate to the "Board Consistency Reform Draft." ||1. Section 2.C states "national average." Where this national average comes from needs to be stated for consistency.||2. Section 30.2.a states "responsible charge of Engineering." This needs to be defined and measurable.||3. General comments throughout document. See below.||3a. MT State residency has been removed. Residency should remain as a requirement.||3b. Citizen of US has been removed. US citizenship should be required.||3c. Term limits have been removed. Term limits are very important for obvious reasons and should remain.||3d. Multiple sections removed "who have been actively engaged in the practice of their respective professions for at least 3 years preceding appointment to the board." Does not make sense to remove this statement, should remain in document.||3e. Multiple sections removed "MT" or "Montana" in regards to requirements for members from document. These are "Montana" Department of Labor and Industry boards and should be represented by practicing professional within the State as opposed to from other states.||Thanks for all your efforts!!

**Please provide your first and last name** Kevin Jacobsen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232627  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The State Board of Real Estate Appraisers maintains a directory available to the public of disciplinary actions against those who are licensed without regard to when they occurred. In effect these remain on the record forever. There needs to be a reasonable sunset limit on how long these are reasonably available to the public. Appraisers are directed to keep records for five years. This seems to offer a reasonable sunset period after which the notice of past disciplinary action would be expunged. or at least removed from public view.

**Please provide your first and last name**

Douglas Smith

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232628  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Title-37-Reform.docx, pg 322, section (2)(c) - suggest that the word "supervised" be inserted between "2 years of" and "progressive experience" for consistence with similar requirements for baccalaureate or master's program education per pag 321 section (1)(a). ||My rationale is that additional education does not substitute for interactive supervision under a licensed practicing professional.

**Please provide your first and last name**

Kenneth Anderson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232629  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Under 37-12-302, it states: (a) have graduated with a bachelor's degree from chiropractic program accredited by the council on chiropractic education or other national accrediting body as prescribed by board rule. My solution would be to strike "have graduated with a bachelor's degree" as all Chiropractic Programs accept incoming students with and without a bachelor's degree. The accrediting body, CCE, clearly states the prerequisites for incoming students, of which a minimum of 90 hours is needed with specific prescriptive courses. In a time where student costs are rising, and one of the biggest challenges is to reduce the cost of education, the above current provision flies in the face of what is happening in education. Statistics show Chiropractors who graduate without a bachelor's degree do just as well or better on national board scores, as well as in the classroom. There are only a handful of states that have this provision in their licensing law, and it was once put in for the purpose of decreasing the number of applicants in a state. If Montana is to follow its rule of having an applicant graduate from a CCE-accredited college, then it only makes sense to follow the guidelines set forth by the said accrediting agency on who may be admitted into the chiropractic college. The current law is causing undue time and money for those graduates who enter the chiropractic without an undergraduate degree, and want to practice in Montana. I am proud to hold a license in the great state of Montana, and have a home here. I am also the President of Life Chiropractic College West, one of the largest chiropractic programs in the Western States. I know the rigor of the program, the oversight by the CCE, and the new student who would love to consider practicing in Montana. Let's welcome them if they pass everything required by the colleges and the CCE, and not add undue stress from a law that once may have made sense, but does not anymore. Thank you for allowing me to comment, and I applaud you for making and updating governance statutes...it takes time, talent and treasure to do so, and for this I thank you!! Dr. Ron Oberstein

**Please provide your first and last name** Ronald Oberstein

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232630  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency Reform, Page 43: The board of Architects and Landscape Architects should be required to maintain board members who are Licensed professionals with at least 3 years of professional practice. To eliminate those requirements would open to the door to Board members who have little or no knowledge of the practice of Landscape Architecture. This could have negative impacts on public Health, Safety, and Welfare. Title 37 Reform "37-1-131. Please maintain current language for the Duties of the Boards. New language, combined with potential for non-professionals to make up the boards, severely endangers public health, safety, and welfare by making it possible for unqualified individuals to practice Landscape Architecture and to not face severe penalties for breaking rules. The language about licensure standing in the way of competition is vague and again opens the door to unqualified individuals being named as Landscape Architects and being allowed to design and detail plans that create public health, safety, and welfare dangers. If MT does away with a professional Board for Landscape Architects: Landscape Architects originally licensed in MT may not be able to gain reciprocal licensure in other states. This would SEVERELY limit ability of MT Landscape Architects to earn a living and grow their businesses. Our livelihoods depend on professional licensure and that licensure being equal to all 49 states that do require professional boards. This cannot be understated: removal of a professional Landscape Architecture board in MT could have huge negative impacts to existing Landscape Architecture individuals and practices.|||||

**Please provide your first and last name** Troy Scherer

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Unique ID: 1052232631  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Do NOT remove licensing for landscape architects. This is coming from a licensed landscape architect. I did not spend time attending college for a professional degree as well as perform thousands of hours of apprenticeship only to see an overzealous government take away my professional credibility.

**Please provide your first and last name** Neil Kiner

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232632  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Twice over current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have a submission for the Governor's Red Tape Reduction Initiative if it is not too late. I do not wish to comment on existing drafts. Is there time for me to make a submission?

**Please provide your first and last name** Tony Novotny

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
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Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I appreciate your work on this process. I watched the first informational session and I am not able to attend the September 29 listening session but I will plan to watch that as well. I am not able to open the draft proposals that are linked below on this website. I keep getting the pop up request to submit a suggestion, but I would like to read the drafts. I previously commented that I thought the Board that I serve on (Board of Speech language Pathologists and Audiologists) does an excellent job of regulating our professions and protecting the consumers. We've done a lot of work over the past few years to improve our administrative rules. I will say that the process to get people on the Board is very slow and the Complaint process for all boards should be improved as complaints are not always addressed in a timely manner. It's also unfortunate that we have can't do much to stop when an unlicensed person represents themselves as a qualified professional. I look forward to participating in future listening sessions.

**Please provide your first and last name** Rachel Stansberry

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232634  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

First, I would like to say that as a long standing Private Security Guard licensee and a senior member of management within one of the largest contract security companies in Montana, it is not only my belief but that of our organization that the Board of Private Security should remain the overseeing body of our profession. A state program, we feel, will only diminish the reputation of our profession when in fact we should be holding those within our profession to a higher standard for the sake of public safety. (Board Consistency Reform in general)||While the Board of Private Security is a necessity for our profession, we as contract security companies do not get the proper representation that we should on the board. By having only one member from a security company on the board, that one seat speaks for a very large group in Montana. My particular industry of CIT (Armored Car Service) has not held a board seat for many years. As a result, the proper insight and industry knowledge is not represented on the board. If there are three members of law enforcement on the board, then I feel it is only appropriate that at least two different security companies be represented as well. If not, then the board needs to offer more ways for the private security industry and members of the public to participate in meetings than they do currently. (Board Consistency Reform, section 35, pages 50-51)||In reference to Title 37 Reform, section 2, page 7. The proposed 45 days the State is allowed to take to issue a license for a routine application, with all due respect, is unacceptable. Currently private security guards, as well as other professions I'm sure, have to wait an unreasonable amount of time to receive certificates of licensure. Especially in today's workforce climate, individuals can not wait 45 days before they can earn a paycheck, nor will most find alternative jobs in the interim, they simply will move on. As an essential part of Montana's economy, I can tell you that the financial institutions and commercial businesses that rely on our CIT services would find this unacceptable as well. As a potential alternative, would the State consider further discussion and possible implementation of a private security guard trainee license/certificate/or training period that lasts 45 days from the submission of a routine application to the time of full licensure? Based on current regulations for Private Security Guards, a new licensee must 1: be hired by a contract security company (which doesn't make sense if they must be licensed first) and 2: complete a mandatory 16 hour course and for those that seek a firearm endorsement, they must complete a state approved firearms course with a state approved firearms instructor. These conditions, as well as all the fees, must be met before an application can be submitted, so why should it take 45 days? I offer up, that if those conditions are met, why not allow for a trainee period (whether armed or unarmed) where that licensee works directly with a training officer who is actively licensed in the state of Montana during that timeframe? Could this be considered under Title 37, section 24, page 50 - Provisional License? What recourse do licensees or business entities have to uphold the State's side of the bargain? Far too many times in the past, with routine licenses mind you and not the non-routine, have we as a security company waited longer than 45 days for a license to be approved. One case in particular took 6 months. I would like to see some recourse for delays caused by the

State; all fees refunded would be a start.||Lastly, I have concern for the language in Title 37, section 24, item 5, page 52. If a Montana resident applying for a license has to wait 45 days to have an active license, how is it ok for a non-resident to submit ""registration"" with the Department of Labor & Industry and practice in their profession unchecked in Montana for 21 days? This is concerning not just for Private Security or for all the other licensed professions but for Montana as a whole. Who is going to police these individuals and monitor that they are in ""good-standing"" not only for the State they originated from but that of Montana. What happens if they are not? Who will pursue corrective action? Who will pursue corrective action if that person leaves the State? Are the penalties the same for resident versus non-resident licensees? I would ask for further clarification on this topic.||Thank you for your time and consideration of my comments and hope that I am given the opportunity to address these issues with everyone during the session.||Thank you!

Please provide your first and last name Erik Ewing

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Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current Montana Professional Licensing Board Member

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comment on Title 37 reform, section 37-26-401 MCA regarding Naturopathic Physician titles. ||I am opposed to removing the exclusive use of the terms ""dr."" ""doctor,"" ""doctor of naturopathy,"" ""doctor of naturopathic medicine,"" ""naturopath,"" ""naturopathic physician,"" and the abbreviation ""N.D.,"" ""naturopathic medicine,"" ""naturopathic health care,"" ""naturopathic,"" and ""naturopathy"" from the MCA. ||The reason is that naturopathic doctor/physicians are LICENSED in the state of Montana, however, in many states anyone can call themselves and ""naturopathic doctor"" and there are many schools who tout online courses ranging from several months to several years and graduate ""naturopathic doctors"" who do NOT HAVE THE APPROPRIATE MEDICAL TRAINING. ||I believe it will create confusion and open a door for these graduates from unlicensed or unaccredited or unapproved institutions the right to use a term that is confusing to the consumer. Here are a few examples of ""colleges"" that are currently or previously offering ""ND"" degrees:|[https://en.wikipedia.org/wiki/Clayton\\_College\\_of\\_Natural\\_Health](https://en.wikipedia.org/wiki/Clayton_College_of_Natural_Health)|<https://bluemarbleuniversity.com/online-doctor-of-naturopathic-medicine-degree/>|<https://theschoolofnaturopathy.com/programs/naturopathic-doctor-program/>||This is a public safety concern since these ""naturopathic doctors"" are NOT licensed or trained to practice medicine and do not have the appropriate medical knowledge to diagnose or treat illness. They function mostly at the level of health coaches and nutritionists in other states. THIS IS A VERY SERIOUS PUBLIC SAFETY CONCERN. ||Omitting these titles will also allow other practitioners, such as chiropractors, nutritionists, MDs, etc to use the term even if they do not have training. Licensed Naturopathic physicians cannot call themselves MDs or chiropractors, so it reasons that these other professions cannot utilize the term ND.||Naturopathic medicine is unique in its application and is a great healthcare asset in Montana. Treating both acute and chronic illness at low cost, the definition of the practice of naturopathic medicine and the titles the practitioners can hold is important to preserve. The public demand for naturopathic medicine is high and growing in Montana and we must assure that the public can count on qualified and skilled practitioners with appropriate training and schooling. ||Please retain the definition and titles of Naturopathic physicians in the state of Montana for public safety and protection of the Naturopathic businesses in Montana, ||Thank you, Dr Alisun Bonville, AHC Board ND chair

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**Please provide your first and last name** Alisun Bonville

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232636  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am an actively practicing Registered Dietitian and Licensed Nutritionist in Montana. I also serve as the Public Policy Chair of the Montana Academy of Nutrition and Dietetics (MTAND), the state affiliate of the Academy of Nutrition and Dietetics, the leading professional organization for Registered Dietitians. MTAND shares the goal of modernizing and streamlining licensure while protecting public safety. We have been working on these issues for the past few years, and would love a seat at the table and a meeting to discuss these changes as they relate to LN licensure, including modernized definitions and terminology that better define scope of practice and create employment opportunities for those at various levels of training.

**Please provide your first and last name** Paige Sadowski

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Unique ID: 1052232637  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a representative of the Montana, Academy of Dietetics and Nutrition, a state-wide professional organization of food, dietetics, and nutrition professionals. Our organization has been working on efforts to modernize the current nutritionist statute ([https://leg.mt.gov/bills/mca/title\\_0370/chapter\\_0250/part\\_0010/sections\\_in dex.html](https://leg.mt.gov/bills/mca/title_0370/chapter_0250/part_0010/sections_in dex.html)) for more than a year. Thus, we align with goals of the Governor's Red Tape Reduction Initiative. We have read the drafts the DLI is proposing and note that the Title 37 Reform draft proposes several sections the nutritionist statute (pp. 197-202) for amendment, 37-25-102 Definitions, 37-25-302 Licensing Requirements, 37-25-303 Issuance of License. For example, we recommend including the term Medical Nutrition Therapy as new a definition in 37-25-102. ""Medical Nutrition Therapy"" means dietetics and nutrition practice intended for the treatment or management of diseases or medical conditions. ||We would appreciate communicating directly with DLI about this and several text other revisions for sections to accomplish the following: modernize and clarify the amendments to better address the purpose of nutritionist licensure to protect public health and safety, reduce regulatory burdens of the current statute, and enable non-licensed individuals to expand their services while ensuring that medical-level dietetics-nutrition services remain provided, as the statue intends, by practitioners with minimum necessary education, training, supervised practice, and competencies. ||We would also appreciate consideration of minor edits to 37-25-301 Scope of dietetics-nutrition practice and possibly include additional items listed in 37-25-304 Exemptions from Licensure Requirements to clarify the types of activities for which licensure is not required. The current terminology has led to confusion and would benefit by revision to improve clarity. We are ready and able to offer our revisions and their rationales. We seek the opportunity to work with DLI to do so and await a response from DLI.||Additionally, we recognize in the Board Consistency Reform draft (pp. 11-13) that 2-15-1731 Board of Medical Examiners affirms that one nutritionist is one of 13 members of the BOME. We appreciate that the DLI recognizes the expertise and value of a licensed nutritionist as a member of this essential medical board whose mission incudes protecting public health, safety, and wellness. |

**Please provide your first and last name** Patricia (Patti) Steinmuller

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232638  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Re: draft 37-12-302|||In recent changes to the MCA specifically regarding the requirements for a chiropractor to be licensed in the State of Montana, there seem to be several changes that could severely impact the profession in the state. The first of which removes any requirements that an applicant provide proof that he or she graduated with a Doctor of Chiropractic degree. This is the standard of the profession ubiquitously. Removing this requirement of presenting a diploma stating such could open doors that could not only severely harm the profession but put the general public in danger of unsafe practices performed by inadequately trained individuals.||Second, the language of the proposal stated bachelor's degree from chiropractic program accredited by the council on chiropractic education or other national accrediting body as requirements. Our State Universities are largely accredited through regional accreditation. It would be very unjust to deny a student obtaining a degree at one of our local regionally accredited colleges/universities to seek licensure in our state. Thank you for your consideration.|||Respectfully,|||Sheridan Jones, D.C.

**Please provide your first and last name** Sheridan Jones

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IP Address:  
Unique ID: 1052232639  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** EMAIL NOTIFICATIONS to manp@montanand.org||Hello, I attended the previous listening session and am subscribed to the interested parties list of the Board of Alternative Health Care, and received your email, Date: Wed, Aug 17, 2022 at 1:22 PM|Subject: Mark Your Calendar: Department of Labor & Industry's Professional Licensing Informational & Listening Sessions on Potential 2023 Legislative Changes||but we did not receive the email notification:|Date: On Mon, Sep 19, 2022 at 4:16 PM|Subject: Fwd: Drafts Released and Open for Comment on Red Tape Reduction for Licensing||Thank you for your assistance.

**Please provide your first and last name** Ingrid Lovitt

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Unique ID: 1052232640  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency Reform Draft for Public Comment:|Section 3.1 and 3.2 Opposition. The board should be appointed by the governor with senate approval. The governor should not be able to remove members without cause. This makes it too easy to rid members of the board whenever there is a change in leadership. This would have the potential of new boards every 4 years and become more about politics than creating effective, consistent leadership in the licensing departments. |Section 6.4c 6.4d. Opposition. The Board should be US citizens. And, they should have resided and practiced in this state for AT LEAST 5 years. I do not want a board that makes decisions for me that has no experience living where I live and working where I work. We should be governed by our own and that means having experience living and working in our state before making decisions about our state. |

**Please provide your first and last name** Barb Solf

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Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am the Executive Director of the Montana Chiropractic Association and would like to offer my comments on recent proposed changes to 37-12-302, Qualifications for licensure--chiropractor. We have two concerns; the language refers to ""bachelor's degree from a chiropractic program accredited by the council on chiropractic education or other national accrediting body..."" This change would disqualify a graduate from one of our local regionally accredited colleges or universities from seeking licensure in Montana. The 2nd concern is the removal of the requirement that an applicant must present a diploma proving that he/she graduated with a doctorate of chiropractic degree. We think this will put the public at risk of being treated by practitioners who are not adequately trained and ask that this requirement remain in statute. Thank you for your consideration, Brad Griffin, Executive Director, Montana Chiropractic Association

**Please provide your first and last name**

Brad Griffin

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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As a multiple real estate license holder( property management and sales) with the same education requirements, it would save licensees time and money and education providers confusion and expense if they did not have to report education twice(once for each license).

**Please provide your first and last name** Scott Muller

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Unique ID: 1052232643  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

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Comment on Title 37 reform, section 37-26-401 MCA regarding Naturopathic Physician titles. ||I am opposed to removing the exclusive use of the terms ""dr."" ""doctor,"" ""doctor of naturopathy,"" ""doctor of naturopathic medicine,"" ""naturopath,"" ""naturopathic physician,"" and the abbreviation ""N.D.,"" ""naturopathic medicine,"" ""naturopathic health care,"" ""naturopathic,"" and ""naturopathy"" from the MCA. ||The reason is that naturopathic doctor/physicians are licensed in the state of Montana, however, in many states anyone can call themselves a ""naturopathic doctor"" and there are many schools who market and utilize online courses ranging from several months to several years and graduate ""naturopathic doctors"" who do not have appropriate medical training. This is a public safety concern since these ""naturopathic doctors"" are not licensed or trained to practice medicine and do not have the appropriate medical knowledge to diagnose or treat illness. ||Please retain the definition and titles of Naturopathic physicians in the state of Montana for public safety and protection of the Naturopathic businesses in Montana. Thank you.||Dr. Jeff Green, AHC Board Member||

**Please provide your first and last name** Jeffrey Green

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Title 37 reform Ver 1 9/19/2022|Section 137 Section 37-34-303|Would like to see the clinical Lab personnel education requirements consistent with federal law CFR Chapter 42 493 in Subpart M at the following URL - <https://www.ecfr.gov/current/title-42/chapter-IV/subchapter-G/part-493> or at least referenced.

**Please provide your first and last name** michelle griffin

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IP Address:  
Unique ID: 1052232645  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Section 137|Scope of practice for laboratory testing personnel. Combine who can perform lab tests (complexity of test, specific tests and facility type) for Nurses (4 year and 2 year programs), Medical or clinical lab technologist/technicians, Medical assistants (MA) working under the licensure of a MD and Respiratory Care Practitioner. The boards tend to define the scope without reviewing other board regulation. It would be nice to have one place or reference that describes this aspect.

**Please provide your first and last name**

michelle griffin

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Unique ID: 1052232646  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

"Title 37 Reform|NEW SECTION. Section 3.1(2) Except as provided in (3), the department shall use license applicant and licensee email addresses as the primary contact and method of communication."|This is a bad idea. Email address change all the time and spam filters can catch correspondence. I missed my renewal by months once because an old email was used or no notice was just never sent.

**Please provide your first and last name**

David Gray

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Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

""Title 37 Reform|NEW SECTION. Section 3.|(4) The department may impose a fee for service of process or recover the costs of service if a licensee or license applicant refuses to consent to process by electronic means."" ||The state not wanting to provide customer service shouldn't be a reason to fine applicants working with a bureaucracy. Federal Mail should be the normal correspondence method unless the applicant chooses to maintain an online account. If the applicant didn't pay any fees for services then I could see the state wanting to charge for daily operation services. It doesn't appear like that is the case in this revision.

**Please provide your first and last name** David Gray

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The Red Tape proposal appears to do more with a solution looking for a problem than a solution to a problem. I have not run into any issues with the Board of Architects function or performance. I question fixing a system that is working smoothly and effectively with added or new bureaucracy.

**Please provide your first and last name** David Gray

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Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

""Title 37 Reform|NEW SECTION. Section 3.|(5) License applicants and licensees shall notify the department within 30 days of any change in any information previously furnished to the department, including but not limited to, personal history information, individual or business name, contact information, supervisory relationships, supervisory or collaborative agreements, operation plans, designated persons or licensees in charge, officers, directors, or owners, and business location."" ||Why not just at renewal? State Licensure rules are about the last thing a professional mind. We think about it when we are going to renew so lets just take care of all state business at one time.

**Please provide your first and last name** David Gray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

""Title 37 Reform|NEW SECTION. Section 4. |(3)(a) In accordance with 34 U.S.C. §40316 (Public law 92-544), the boards or programs listed in subsections (4) through (10) shall require initial applicants and may require renewing license applicants for the listed license types to submit a full set of fingerprints for the purpose of obtaining a criminal background check by the Montana department of justice and the federal bureau of investigation as a prerequisite to the issuance or renewal of a license."" ||This rule feels like guilty until proven innocent and fingerprinting an intrusion into a personal biometric data. If this intrusion into a persons identity is allowed to stand how will this be protected from fraud and theft? Will the state, employees and individuals given access to this data be held accountable if it is stolen or misused? There should be legal ramifications and damages for these entities for mishandling this type of data. |

**Please provide your first and last name** David Gray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

""Title 37 Reform|NEW SECTION. Section|6. Military spouse temporary license. (1) Any spouse of a person who is actively serving in the United States armed forces, who is stationed in Montana under military orders, and who is licensed in good standing in another state or United States territory to practice a profession or occupation regulated by the department, is, upon application to the department, entitled to receive a temporary license to practice. |(2) The Department shall waive the application fee. |(3) A temporary license issued under this section has a term of three years after the date of issuance and may not be renewed. The provisions of 37-1-141 do not apply to this section.""|I do not see why a persons lifestyle choices should grant them leniency in meeting state law. They chose their life path they are living and should follow the rules and pay fees like any citizen. Just because UPS transferred an employee shouldn't mean their spouse gets a free pass and neither should a spouse of a state or federal employee. |

**Please provide your first and last name** David Gray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

State boards have become too self-righteous and pompous. Members of boards believe they are all knowing and can do no wrong. I would like to especially mention the board of nursing treating nurses like garbage. Nurses with past license actions are basically guaranteed to be denied a Montana license. License fees are outrageous and processing times are unacceptable.

**Please provide your first and last name**

Richard Longfellow

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

My comment is on the Title 37 Reform Draft. I am in opposition of the draft because it does not address the title inequity of LPAs compared to CPAs or the fact that LPAs were written out of statute by the Board of Accountancy back in 2015, which is clearly evidenced in Section 153 of the draft, particularly 37-50-101(8), which defines the practice of public accounting as one who is licensed as a certified public accountant and not a licensed public accountant. ||The draft also does not serve to merge the three remaining LPA licensees into the CPA license class in order to eliminate the confusion and ambiguity given the obscurity of the LPA title given that in Montana, an LPA has the exact same scope of practice privileges that a CPA does. It has been acknowledged by a former executive director of the Accountancy Board that an LPA is basically a CPA under an alternate title.||My proposed solution is to amend Section 156 of the draft legislation with the following verbiage:||Section 156. Section 37-50-318, MCA, is amended to read:|""37-50-318.?Transition of existing licensed public accountants. (1) A person who holds a licensed public accountant license and permit to practice on [date of passage or predetermined subsequent date thereof], issued under the laws of this state shall be issued licenses as certified public accountants and shall be titled as such accordingly." |(The following existing verbiage is stricken: |or certificate transition|July 1, 2015|may renew the person's existing license and is not required to obtain a certified public accountant license under this chapter. The person must otherwise be subject to all provisions of this chapter).||The rationale for this has been addressed extensively in previous comments and therefore is not necessary to belabor herein. Suffice it to say, it serve to help clean up the licensing law language by eliminating confusion and ambiguity due to the obscurity of a title that is functionally identical with CPA and therefore does not pose any health and safety issues.|

**Please provide your first and last name** Jason Jones

Form Name: Comment Submissions - COPY  
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Unique ID: 1052232654  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a licensed Property Manager in the State of MT, the licensing & education process for this license needs updating. Montana has many 2nd homeowners that do not rent their properties. This was the focus of my business. I wanted to be licensed, but the licensing process has absolutely NOTHING to do with the kind of business I run. CE training is an absolute was of my time & money since it is all about leasing, renting, etc. There should be a different kind of license for someone managing private homes that are not rented.

**Please provide your first and last name**

Tori Saunders-Santos

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

On behalf of the Montana Pharmacy Association, we support the overall draft changes for Title 37. In particular we support the proposed change on page 109 to 37-7-506 that calls for removing the outdated Notice to purchaser requirement. We support this change because this law was generated in an era when Brand named drugs predominated the marketplace. The generic at the time were not available to substitute to brand by the pharmacist because it was not permitted due to rules and statutes. This has been rectified over the last 30 years. Currently in the marketplace due to common practice and insurance standards, the generic medication is used exclusively unless the medical provider states the brand must be used. The notice to purchaser sign is an outdated sign in which many other rules and statutes overrule its function.

**Please provide your first and last name** Stuart Doggett

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Title 37 Bill|Create an avenue to reciprocate of the masters electrical license of states with similar licensing requirements

**Please provide your first and last name** Jakob Bissell

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232657  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The governor cannot purport to be "for business" when removing the title language will destroy small business across Montana. I understand removing it from the section it is currently in (37-66-105) under architecture, as that doesn't make much sense to be located there, however title language needs to be included in 37-66-301 or people with no license, education, or experience will practice and purport to be landscape architects when they are not. Not only damaging our small businesses but also endangering the public.||Please put the following language into 37-66-301: However, an unlicensed person may not use the title "landscape architect", "landscape architecture", or any description tending to convey the impression that the person is a licensed landscape architect unless the person is licensed as provided in this chapter.

**Please provide your first and last name** Lessa Racow

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232658  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Montana needs to adopt a contractor license program similar to California's CSLB. Contractors can request as much of a down payment for services and they want and no one hold them accountable to complete work in a professional manner. Testing for ALL trades should be mandatory.... a LICENSED contractor has to become bonded, insured, licensed. All for public safety.

**Please provide your first and last name**

Jim Schneider

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Unique ID: 1052232659  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Policymaker or lawmaker

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please make licensure reciprocity easier across states. Seasonal workers who move often need the benefit of holding to their same therapist during transitional work times.

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**Please provide your first and last name** Molly McCune

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Is it necessary to charge \$85/year for PCLCs just to renew a candidacy licenses?

**Please provide your first and last name**

Emily Crawford

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am very interested in these efforts! I am a clinical psychologist (license #PSY-PSY-LIC-3890), and I would love to see the following:|-Removal of state licensure examination in favor of a signed affirmation for abiding by state laws (Idaho has a similar approach)|-Reduction of annual licensing fees, which are among the highest in the nation|-I am not interested in reciprocity with other state's licenses (although this is also a good idea), but some psychologists obtain accreditation with the American Board of Professional Psychology (ABPP), which represents advanced knowledge and specialization in the field; I would like to see this as an option alternative to licensure for practice in the state of Montana

**Please provide your first and last name**

Christian Zal-Herwitz

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Electrician's code cycles are every 3 years. In Montana, we renew every 2 years with CE requirements. This means that once every 6 years, Montana electricians waste time and money with code updates that we've already taken. We should be renewing our licenses every 3 years instead.

**Please provide your first and last name** David Johnson

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Repeal of Medication Aides. The text has removed any reference to a medication aide. Does this mean medication aides will no longer be recognized in the state of Montana or allowed to practice within the state? There is already a shortage of nurses and medication aides do help relieve some of the burden in long term care facilities with scheduled medications. Medication aides are, however, very limited in what they can do and facilities use an aide for less costly work. This puts more burden on the nurse who does work the floor with the medication aide because the nurse must also do all assessments, charting, insulin, as needed medications, etc that the medication aide cannot do. Plus, facilities are putting medication aides on units by themselves and expect a nurse to float to that unit for PRNs, assessments, etc. Solution is to train medication aides to do more or not use them at all. What is the state going to do?

**Please provide your first and last name** Charlette Small

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Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency, Ver. 2 - Section 17. 2-15-1742., Section 1, 2, a - why are we not requiring them to be licensed? The veterinarians on the board should be licensed in this state as per the requirements. Section 1, 2, b - the technician should be licensed. Section 1, 2, c - the public member should be a consumer of our services and should not be on another board to avoid conflict of interest. Section 1, 3, a - again, why are we not requiring the veterinarians on the board to meet any of these requirements? Is it simply redundant and stated elsewhere? Are we assuming these requirements do not need to be spelled out because they are implied in being "a veterinarian"? I would argue they should be spelled out and would recommend we retain all of this section. I would say the last sentence about legally practicing here for 5 years could be altered/pulled. It excludes veterinarians who work in things like industry or teleservices like the Pet Poison Hotline, and 5 years seems like a lot. However, the rest of the requirements should stay.

**Please provide your first and last name** Samantha Thomas

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Unique ID: 1052232665  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Informational & Listening Sessions for the Department's Red Tape Relief Initiative|Restructuring Board Governance||I am writing in support of keeping the MT Board of Physical Therapy Examiners (BOPTE)||The Montana Board of Physical Therapy Examiners (BOPTE) is critical to protect the public and ensure the profession of PT is meeting its standards and expectations set forth by Physical Therapy practice act and licensure in Montana. This Board is mandated to license and regulate the physical therapists and physical therapist assistants who wish to work in Montana. The Board is mandated to interpret the scope of practice for physical therapy, write regulations, and discipline licensees who have violated the law. The most important function of the Board is to protect the citizens of Montana.||The BOPTE is composed of Physical Therapy professionals who have knowledge, experience, and commitment in protecting the public by overseeing regulations, interpreting scope of practice, fielding complaints, and addressing disciplinary issues if violations have occurred within the Physical Therapy profession. This board understands the profession of PT through their own education and work experience. These are the individuals best suited to license and regulate the Physical Therapy profession for the residence of Montana.||The BOPTE is organized and works with accreditations of schools, has the intimate and complex knowledge of the profession to properly provide oversight and protect the public on Physical Therapy specific regulations and issues.||The BOPTE funds itself and ensures the public a safe, successful experience in Physical Therapy while working closely with the Federation of State Boards of Physical Therapy on the national level. It ensures through the structure of both organizations that Montana Physical Therapy licensed professionals are meeting the national guidelines and standards.||

**Please provide your first and last name** Kim Grover

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Edward J. Timmons|Director, Knee Center for the Study of Occupational Regulation, West Virginia University|Senior Research Fellow, Archbridge Institute|Montana Department of Labor & Industry||October 2022||I appreciate the opportunity to comment on the Department's Red Tape Relief Initiative in Montana. I am an associate professor of economics and director of the Knee Center for the Study of Occupational Regulation at West Virginia University. I am also a senior research fellow with the Archbridge Institute. This comment is not submitted on behalf of any party or interest group.||My comment applies to Version 3 - Title 37 Reform Draft-- more specifically pages 51 and 52 of the document. Section 23. Section 37-1-304 is amended in the draft on p. 51 to read: ||(1) An applicant for licensure by endorsement shall be subject to the application procedure in [New Section 1] and have an active license in good standing from a jurisdiction whose license qualifications, measured at the time of application to this state, are substantially equivalent to the license qualifications in this state as determined by the department. ||It is not clear why this section contains the language ""substantially equivalent."" Several other states including Arizona, Iowa, Kansas, Missouri, and Mississippi have enacted similar reforms that do not contain this language. Arizona, a state that has enacted a reform that simply accepts other state's licenses without an unnecessary comparison, has seen more than 4,600 licensed professionals enter the state since passage in 2019. [1]||Recently published research has shown that reforms to licensure by endorsement can increase migration to a state and thus increase economic activity. [2]||Moreover, the inclusion of this language is inconsistent with other draft initiatives. The Board Consistency Reform Draft on p.3 requires an assessment of whether licensing requirements in Montana are ""greater, less than, or equal to a national average.""||Cosmetologist licensing requirements are one example where Montana is falling behind. In the last 10 years, 15 states have reduced cosmetologist licensing requirements. Virginia may soon join this list with a proposed reduction of cosmetologist education requirements from 1,500 to 1,000 hours.||If licensed professionals are licensed in good standing and can demonstrate experience, it is not clear how consumers would benefit from unnecessary scrutiny of the potential new Montana resident's completed licensing requirements. This will create unnecessary delays, likely confusion, and hardship to prospective new residents of the state.||Based on my research, I would encourage a reconsideration of the inclusion of the ""substantially equivalent"" language in the Title 37 Reform draft.||[1]

<https://www.goldwaterinstitute.org/universalrecognition/>||[2]Darwyn Deyo, Alicia Plemmons, Have license, will travel: Measuring the effects of universal licensing recognition on mobility, Economics Letters, Volume 219, 2022,|<https://doi.org/10.1016/j.econlet.2022.110800>.|(https://www.sciencedirect.com/science/article/pii/S0165176522002920)

Please provide your first and last name Edward Timmons

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Retired Lab Director

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

We need to do more than incremental changes to licensure to address how healthcare facilities address labor shortages in the laboratory. We currently have an environment in small community facilities where laboratories rely on nursing, midlevels, etc. who have inadequate training to deliver quality laboratory medicine where we have MT/MLT staff shortages. Or worse, we have facilities relying on POC testing because they have no staff. This is dangerous. My first recommendation is to fully rescind licensure; I come to this conclusion based on my experience of managing the Billings Clinic laboratory for over 20 years. If we do not do this then I suggest healthcare facilities be given the opportunity to apply for licensure exemption; there would need to be controls in place: 1) expanded inspection schedules, 2) expanded medical directorship reporting (to the CLIA inspector), and 3) action plan from the facility to build their laboratory staff back to appropriate levels to support the healthcare facility.

**Please provide your first and last name** Mark Lubbers

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

We submit the following comments to the Board Consistency Reform Draft (Ver. 2, dated October 3, 2022):|Comments are specific to New Section 3 (5) , appointment - qualifications - terms - page 7, regarding the following language:|""No member of the board may serve as an officer or hold any leadership position in a state or national professional association representing the industry related to the profession regulated by the board for the term of the board member's appointment. A leadership position includes but is not limited to a voting member of an executive board, or service on an ethics committee, Draft for Public Comment Ver. 2 - 10/3/22 - Board Consistency Reform - 8 - Board Consistency - Ver. 2 membership committee, examination committee, or other similar positions of the association or other similar organization."|1. We strongly believe this new provision will have the unintended consequence of weakening and harming the licensing board by limiting eligibility to serve. |2. Due to our population, we do not have the luxury of a large pool of engaged individuals willing to commit and serve. We should be recruiting the very best and most qualified. |3. The most engaged leaders are most often the most knowledgeable. They fully understand the mission of the state licensing board, their role in public service and the need to protect the Montana public. They understand the mission differences between public service and professional organizations. Board members should be the brightest and best of the profession. They are the leaders that keep current on the issues including education, patient safety, etc. impacting patients as well as providers. |4. We have never personally seen an instance of abuse or conflict between the duties of a licensing board member and a professional state or national organization. This provision seems unnecessarily burdensome, overly regulatory and harmful for both the state licensing board and the professional organizations by adding additional regulation and barriers. |5. We are aware of only one state with this limitation on board member service - Louisiana. |We request this provision be removed from draft legislation for the reasons stated above. ||Respectfully submitted, ||Sue Weingartner, Executive Director|Montana Optometric Association|Helena, Montana|406.459.0452|Sue.weingartner@gmail.com|

**Please provide your first and last name** Sue Weingartner

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Unique ID: 1052232669  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I hold a Candidate's License for LMFT in the State of Montana. With as much need as we have for therapists, the 3000 hours of supervision is one of the biggest hurdles for new graduates of accredited college programs. So many places will not hire a candidate because of billing prohibitions. The only reason I am able to work where I do is because of a grant. Our hospitals should be able to hire recent graduates as they have completed 1000 hours of non-compensated work in communities. Now we are hamstrung in working in other facilities because of the ""candidate"" status. I understand the desire for us to have more supervision but if we didn't get it right during our internships we should not be working in the public sector. Please reconsider the 3000 hours of supervision. Please reduce to 1500 or even better 1000 hours. More of us will be able to serve faster and we won't leave the state for opportunities. I went to Virginia for my internship as I could not get a position here in the state of Montana.  
[Requirement:|Proof of completion of 3,000 hours of supervised counseling experience [ARM 24.219.704].

**Please provide your first and last name** Anna Davis

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232670  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Under 37-66-105 (2) You are proposing to remove, ""However, an unlicensed person may not use the title ""landscape architect"", ""landscape architecture"", or any description tending to convey the impression that the person is a licensed landscape architect unless the person is licensed as provided in this chapter.""||I strongly oppose the removal of this language, as it will affect the health and safety of the general public by allowing anyone to call themselves a landscape architect. People will hire these unlicensed individuals assuming that they have specific training in the field, which is misleading. ||You don't allow untrained/unlicensed individuals to call themselves a ""doctor"" or an ""engineer"". ||The field of landscape architecture is often misunderstood - we do not just prepare planting plans. We are architects of outdoor spaces, specially trained in protecting the health, safety, and welfare of the general public (ensuring sight triangles aren't blocked which is dangerous to cars/pedestrians, ensuring surfaces are ADA accessible, designing spaces in accordance with crime prevention standards, designing playgrounds that are safe for children, etc.).

**Please provide your first and last name** Jessica Holdren

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232671  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Regarding Board Consistency Reform: Section 7. Section 2-15-1732 , MCA, is amended to read:"2-15-1732. Board of dentistry. (1) There In accordance |with [Section 1], there is a board of dentistry. |(2) The board consists of ten eight members:|(a) four dentists,;|(b) one denturist,;|(c) two dental hygienists,; and |(d) one public member||As of 10/11/2022, per DLI executive officer Susan Osborne, there are 1002 licensed dental hygienists in Montana, and 892 licensed dentists. 110 more dental hygienists than dentists. The public would best be served with an equal number of dental hygienist and dentist board members, at 3 each. This would also result in an odd number (7) for the board of dentistry, eliminating potential tie votes. The Board of Dentistry has a long history of actual, and attempts of, restraining of trade of dental hygienists and denturists, due to the imbalance of representation on the board, including being subject to active supervision. Dentists are experts on dentistry. Dental hygienists are experts on dental hygiene. Equalize the representation on the board.

**Please provide your first and last name** Diedri Durocher

Form Name: Comment Submissions - COPY  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Increasing License Mobility and Processing Efficiency No specific page.:  
Provide opportunity for professionals to obtain/re-obtain licensure in desired areas of experience without requiring subsequent work certification or additional costly education requirement.

**Please provide your first and last name** Rober Keele

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Remove requirements for reporting psychological or psychiatric counseling for all medical and health professions licensure. These questions deter professionals from appropriately seeking help with burnout and PTSD as they fear losing their licenses. It has never been shown that those in counseling are detrimental to patients. With shortages of healthcare personnel and high rates of burnout everything possible needs to be done to promote mental health of health-care personnel. On another note: HVAC technician need full licensure . They are dealing with heating systems with the potential for fires, natural gas leaks and CO. They are totally unregulated.

**Please provide your first and last name** Jan Newman

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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This is deregulation and an attempt at diluting and undermining professionals. Striking language of "licensed" from architects is one first step and, unfortunately, this will set precedent for other states in the union to follow. This ultimately puts the health, safety, and welfare of the public at risk. In the laundry list of suggested provisions to be repealed from the Montana Code Annotated, enforcing those practicing without a license will only be more difficult.

**Please provide your first and last name**

Jordan Zignego

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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After reviewing the zoom meetings I believe it would be in the best interest for licensees for the Board of Cosmetology to shifted to a program. I also believe that Montana should have reciprocity with all other states. Going back to school for additional hours in Montana is is only beneficial to schools. It's inconvenient and expensive for people seeking to transfer their license to Montana.

**Please provide your first and last name**

Tassi Duffner

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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I support the recommendations submitted by the Montana Academy of Nutrition and Dietetics to modernize nutritionist licensure in Title 37 Bill Version 3. ||Section 111 Section 37-25-102, p. 204|37-25-102 Definitions: ||Include a NEW DEFINITION: ""Medical nutrition therapy"" means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions. ||Include ""and intervention"" in the definition of nutrition counseling. ""Nutrition counseling and intervention."" ||Revise the definition of nutritionist: ""Nutritionist"" means an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy. ||Section 112 Section 37-25-302, p. 205|Revision to 37-25-302. Nutritionist license required. |An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37 chapter 1. ||Section 113 Section 37-25-303, p. 206|Revise: 37-25-303. Qualifications for nutritionist license. |An applicant for licensure as a nutritionist shall have current, valid registration from the commission on dietetic registration, or its successor organization, subject to the commission's accreditation by the national commission for certifying agencies. ||Personal note: |I have been a licensed nutritionist by the Montana Board of Medical Examiners since 1988, working full time for more than 30 years. Medical nutrition therapy is the modernized legalized term for the professional services of the registered dietitian nutritionist, which I am. (These services were formerly called 'clinical nutrition', 'diet therapy' or 'medical diet.') Hence, the definition of medical nutrition therapy recognized by the national Academy of Nutrition and Dietetics, is required in Title 37 and must be included. Thank you.

**Please provide your first and last name** Mary Musil

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In Version 3 - Title 37 Reform Draft: ||37-17-302, (1): psychologists have doctoral degrees in either clinical psychology OR counseling psychology; additionally, doctorates can be earned from colleges/universities OR professional schools. Therefore it should read ""have a doctoral degree in clinical or counseling psychology from an accredited college, university, or professional school with a graduate program approved by the American Psychological Association""||I would also like to see 37-17-302 (4) more specific, such as stating that the applicant has ""passed the Examination for Professional Practice in Psychology (EPPP)""--which is the national psychologist examination. I would prefer that psychologists no longer need to pass a state-level jurisprudence examination, instead having the option to affirm that they will practice in accordance with state laws (as is the case in, for example, Idaho).

**Please provide your first and last name** Christian Zal-Herwitz

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Re: Title 37 Reform, 37-1-304, License by Reciprocity, beginning on page 50. In reading this section I see the proposed rules for the process of obtaining reciprocity. I'm wondering if the Board has considered the Counseling Compact which, as I'm sure you know, is "an interstate compact, or a contract among states, allowing professional counselors licensed and residing in a compact member state to practice in other compact member states without need for multiple licenses." As stated on their website (counselingcompact.org), the benefits of this compact include "helping counselors by affording them greater ease of mobility, cutting drastically the time needed for authorization to practice in a new state; creating new market opportunities for counselors; and helping clients by improving continuity of care when clients or counselors travel or relocate. Currently 17 states have joined the Counseling Compact. I think pursuing this would be a huge benefit to our communities. Thanks so much for all of your hard work and for accepting public comments!

**Please provide your first and last name** Lynette Rodi

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft for Public Comment Ver. 2 - 10/3/22 - Board Consistency Reform|Page 10|Section 5. Section 2-15-1730, MCA, is amended to read:|"2-15-1730. Alternative health care board -- composition|-- terms -- allocation. ||QUESTION 1: DOES THE FOLLOWING MEAN THAT THE PUBLIC MEMBER COULD BE A LICENSEE NOW, OR IS THIS RESTRICTION MOVING SOMEWHERE UNDER A GENERAL STATUTE FOR ALL BOARDS? |(b) one public member deletes: xx""who is not a member of a profession|regulated by the board; ""xx and ||QUESTION 2: DOES THIS MEAN THAT THIS PHYSICIAN MEMBER COULD BE AN OUT OF STATE PHYSICIAN?|(c) one member who is a xx (deletes ""Montana""))xx physician whose practice|includes obstetrics. ||QUESTION 3: DOES THIS. MEAN THAT BOARD MEMBERS WOULD. NO LONGER BE APPOINTED BY THE GOVERNOR AND APPOINTED BY THE SENATE? |(2) The board consists of six members xx DELETES"" (appointed by the|governor with the consent of the senate.)"" xx The members are:

**Please provide your first and last name** Ingrid Lovitt

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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for an act amending behavioral health licensing statutes; page 8 lists the definition of a mental health professional. I notice that Physician Assistants such as myself and my colleagues who are practicing in Psychiatry are not considered recognized mental health professionals. I have been practicing in this specialty for nearly two years and have colleagues who are fellow PAs who have been practicing much longer than myself. We prescribe medications and manage patients of all ages with mental health diagnoses across the spectrum. As Physician Assistants, we have the opportunity to obtain certificates of additional qualifications in specific specialties including Psychiatry. On behalf of myself and my fellow Psychiatric PAs, I believe that certified PAs should be included in the definition of mental health providers in this proposal.

**Please provide your first and last name** Claire Mastel

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Board of Behavioral Health Consolidation|Section 2 Definitions|(15)  
"Mental health professional" means:|In this draft, physician assistants such as myself and my colleagues who are practicing in psychiatry are not recognized as mental health professionals. I have been practicing in psychiatry for over 6 years. As a physician assistant in psychiatry, I diagnose mental health conditions, prescribe medications and provide psychotherapy. I manage patients of all ages with mental health diagnoses across the spectrum. As physician assistants, we have the opportunity to obtain certificates of additional qualifications in specific specialties including psychiatry. On behalf of myself and my fellow physician assistant colleges working in psychiatry, I believe that certified physician assistants should be included in the definition of mental health providers in this proposal.

**Please provide your first and last name** Naomi Routen

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am glad to see the BOPTE is still a stand alone board. This is very important given the large number of PTs in the state, the complexities and wide range of specialties within the field of PT, and that the BOPTE has not demonstrated any excessive burden financially or otherwise while maintaining the safety of the public as it relates to PT services.

**Please provide your first and last name** sam schmidt

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Current licensed professional in MT

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Title 37 page 5 the new language section on membership of a board, inclusion of an additional license, may not result in adding that license type as a member of that board. I am a Licensed Midwife and would want and need my professional license to have representation on the board.

**Please provide your first and last name** Molly Danison

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Current licensed professional in MT

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Board consistency reform, Section 8, Section 2-15-1732||There are more licensed dental hygienists than dentists in the state of Montana (1002 dental hygienists and 892 dentists) I feel the public is best served with an equal number of dental hygienist and dentists on the board with 3 each and then a denturist to represent the trade. I feel this is an appropriate way to represent the needs of the public on the board of dentistry.

**Please provide your first and last name**

Melissa Kjos-Peterson

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I support the recommendations submitted by the Montana Academy of Nutrition and Dietetics to modernize nutritionist license in Title 37 Bill Ver 3. Included in the revisions are the following, written in italics:|Section 111 Section 37-25-102, p.204|"*37-25-102 Definitions*|- Include medical nutrition therapy as a new definition: "*Medical nutrition therapy*" means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions. |- Include "*and intervention*" in the definition of nutrition counseling: "*Nutrition counseling and intervention*"|- Revise the definition of nutritionist. "*Nutritionist*" means: an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy.|Section 112 Section 37-25-302, p. 205|- Revision: "*37-25-302. Nutritionist license required.*|An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37, chapter 1.|Section 113 Section 37-25-303, p. 206|- Revision: "*37-25-303. Qualifications for nutritionist license.*|An applicant for licensure as a nutritionist shall have current, valid registration from the commission on dietetic registration, or its successor organization, subject to the commission's accreditation by the national commission for certifying agencies.||Medical nutrition therapy is important to my practice in educating interns and providing nutrition education and consulting services. |

**Please provide your first and last name** Katie Bark

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Unique ID: 1052232686  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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We have submitted an attachment of this recommendation to the email [dlibsdcotts@mt.gov](mailto:dlibsdcotts@mt.gov) for formatting purposes. ||Suggested changes for Board Consistency Reform section 9 section 2-15-1734|The board currently consists of nine members: five registered nurses (one must have experience in administration, teaching, or supervision in one or more schools of nursing; one must be an advanced practice registered nurse; one engaged in a rural healthcare facility; and one must be currently engaged in administrative supervision or provision of direct client care), two practical nurses, and two members of the public. |I propose the following changes: |1. Replace the two public members on the board with two additional registered nurses.|• Nursing has become increasingly more complex with many different specialties and types of care provided. Members of the public do not have the training to understand nursing practice and needing to explain nursing practices during sessions makes board meetings less efficient. This change would mean all members have a basic understanding of nursing while increasing the diversity of type and scope of nursing practice represented on the board. |2. Require only one practical nurse.|• Finding two LPNs will likely become increasingly more difficult as many return to school to become RNs. LPNs are more often working in nursing home settings, which means the current composition of the board does not allow for many nurses who are currently working in the hospital setting. This would allow more opportunity for registered nurses who are practicing in the hospital setting to be represented.|3. Add a stipulation that two registered nurses need to be currently engaged in acute care in a large Montana hospital.|• It is important to ensure that there are adequate board members representing the largest population of nurses working in the state of Montana.|4. If changing number of board members, reduce to no fewer than seven.|• With many different nursing practices in the state, the board must be able to adequately represent the majority of types of care. Reducing to the number to seven as requested in recent draft while still allowing a public member and two LPNs would significantly reduce the education and understanding of nursing practice within the board. |i. If reducing to seven members we suggest: zero public members, one LPN, six RNs (with a minimum of one administrator in a nursing school, two from acute care large hospitals, one advanced practice nurse, one rural nurse as the only stipulation to composition).||Suggested changes for Title 37 Reform section 65 section 37-8-423 |The current statute reads:|(3)(c) has have been employed as a certified nursing assistant in a long-term care facility licensed to provide skilled nursing care, as defined in 50-5-101, for a minimum of 2 years|2(b) practice only in a long-term care facility licensed to provide skilled nursing care, as defined in 50- 5-101|I would like to make the following changes:|1. Change (3)(c) to read: have been employed as a certified nursing assistant in a facility licensed to provide nursing care for a minimum of one year. |• One year of CNA experience is sufficient to be able to increase knowledge as a medication aide. This will also increase the speed at which new medication aides can enter the workforce. |• Remove long-term care facility to allow for med aides to be used in the acute care setting. |2. Change (2)(b) to read: practice in a facility licensed to provide nursing care.|• There is a nursing

shortage that research has shown is only going to worsen in the coming years. Nurses in acute care hospital settings are taking higher-acuity patients with higher staffing-to-patient ratios in an attempt to make up for the shortage. Nurses are struggling to provide the high standard of care they have prided themselves on, causing an increased strain on their mental health. These changes have led to higher rates of turnover away from acute care nursing, fewer new nurses choosing to enter the acute care environment, and a reduction of hours willing to work. Hospitals have been hit with the financial strain of increasing sign-on bonuses and retention bonuses to disproportionate amounts and needing to supplement with travel nurses. This compounded with increased supply costs due to supply shortages, decreased reimbursements from insurers, and more acutely ill patients is creating negative profit margins. While this may be sustainable in large cities with multiple hospital systems, it is not a sustainable option for Montana's communities. This continued struggle both with nurses and hospital systems is bound to create poor outcomes for Montana's residents. |Throughout the history of nursing, many changes have been made to the practice models in which nurses deliver care. These changes came during times of changing economic demands and new innovations. As the growth of sciences in medicine and the human body became better understood and extensively researched, more laws and regulations were made in the name of safety and evidence-based practice. As the nursing practice became more regulated, many tasks were taken from unlicensed individuals and given to nurses to perform. The Centers for Medicare & Medicaid Services (CMS) became increasingly more involved in regulating hospitals and nursing practices, seemingly creating a stagnation in new effective nursing solutions and changes. In fact, long-term nursing home facilities have become one of the most highly regulated industries in the U.S. Medication aides are being used in these Montana facilities, which has helped them provide care to our most vulnerable patient populations while providing time for nurses to oversee all patient care plans. |It is time to relook at how nursing care is provided in the acute care setting. We have been providing care in a similar way for many years despite technological advances with built-in safety mechanisms. For example, barcode scanning in the electronic medication administration report (EMAR) has significantly reduced medication pass errors. One study showed a reduction of medication errors by 41% by using barcode scanning in the EMAR and 51% reduction in potential drug-related adverse events. EMARs with barcode scanning can stop a user from giving medications at the wrong time, giving the wrong dose, giving the wrong medication, etc. They can even inform the user if the medication is being given for the first time during the hospitalization to prompt the nurse to educate the patient on the medication and its possible side effects. With this type of safety measure in place, medication aides could be safely delegated to do medication passes for oral medicines in which the nurse has already given a first dose and has educated the patient. Reducing the nurse's workload by removing one of the most time-consuming tasks would allow the nurse to continue to have the higher patient ratios that they currently have. While this may not bring more nurses into the acute care

setting, it would allow the acute care setting to better function with a team nursing approach. This would allow nursing to spend more time focusing on the patients' complex physical, emotional, biological, behavioral, and psychological care and education needs. This ability to return to providing a higher standard of nursing care would allow nurses to find a renewed passion and purpose. With nurses feeling less burnt out, hospitals would be able to focus more efforts on retention, education, and patient safety initiatives. So, what is stopping hospitals from making this change? What laws are already in place? |CFR title 42 chapter IV subchapter G part 482.23 (c)(2) |All drugs and biologicals must be administered by, or under supervision of, nursing or other personnel in accordance with Federal and State laws and regulations, including applicable licensing requirements, and in accordance with the approved medical staff policies and procedures.|CMS Interpretive Guidelines §§482.23(c)(1), (c)(1)(i) and (c)(2)|Federal and State Law Federal law regulates the approval and classification of drugs and biologicals. Individual States establish laws and regulations which specify the scope of practice for various types of licensed healthcare professionals, including which medications they may prescribe and administer, including controlled substances. Accepted Standards of Practice Hospital policies and procedures for the preparation and administration of all drugs and biologicals must not only comply with all applicable Federal and State laws, but also must be consistent with accepted standards of practice based on guidelines or recommendations issued by nationally recognized organizations with expertise in medication preparation and administration.|Federal law clearly reads personnel other than nurses can administer medications if practicing within law and in accordance with approved medical staff policies and procedures. In Montana, nursing rule 24.159.1625 would allow medication administration to be delegated. However, CMS interprets the law to also include accepted standards of practice. Unfortunately, due to CMS overreach, new practices cannot be easily or quickly trialed and researched to create new accepted standards of practice. Therefore, it is pertinent to include the medication aide used in the acute care setting in our state law. This would allow hospitals protection in trialing new care models to improve healthcare delivery to Montanans. |||

Please provide your first and last name Alicia Beagles

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Current licensed professional in MT

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NEW SECTION. Section 3. Appointment - Qualifications - Terms (2) The governor shall have the authority to remove members of the board with or without cause. A board member who misses three meetings over a period of one year without good cause shall be removed from the board automatically. ||I would like clarification on whether or not section 2 is referring to two separate powers or if they are referring to a member being removed without cause for missing meetings. If they are separate and the governor is allowed to remove any member without cause, I oppose this text.

**Please provide your first and last name**

Mercedes Overlie

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Director or member of an association connected with a licensed profession

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I support the recommendations submitted by the Montana Academy of Nutrition and Dietetics to modernize nutritionist license in Title 37 Bill Ver 3. Included in the revisions are the following, written in italics:|Section 111 Section 37-25-102, p.204 ""37-25-102 Definitions - Include medical nutrition therapy as a new definition: ""Medical nutrition therapy"" means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions. - Include ""and intervention"" in the definition of nutrition counseling: ""Nutrition counseling and intervention"" - Revise the definition of nutritionist. ""Nutritionist"" means: an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy.|Section 112 Section 37-25-302, p. 205 - Revision: ""37-25-302. Nutritionist license required. An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37, chapter 1.|Section 113 Section 37-25-303, p. 206 - Revision: ""37-25-303. Qualifications for nutritionist license. An applicant for licensure as a nutritionist shall have current, valid registration from the commission on dietetic registration, or its successor organization, subject to the commission's accreditation by the national commission for certifying agencies.||I strongly believe in the importance of proper qualifications and licensure related to nutrition. Personally specializing in oncology, pediatrics and sports nutrition I have seen the harm that poor information can have on treatments, growth, ability to thrive, performance, injury and recovery of those I myself and colleagues care for. Maintaining licensure will help keep people safe and thrive.

**Please provide your first and last name** Jacob Barnett

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Current licensed professional in MT

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My suggestion is to look at electrical contractor licensing limits regarding sub-contracting. According to the State Electrical Board there is no provision for sub-contracting from one electrical contractor to another. I understand that the objective of the rules is to stop unlimited licensees from selling permits to limited contractors for commercial work. In Billings there have been state complaints filed when friends are helping each other finish larger jobs but are not technically employees. I think there is room for the rules to be amended so that contractors can have other contractors help for short periods of time and on very limited job sites. There could be a ratio of employees to non-employees that needs to be maintained also. I think there's lots of solutions that could open it up and to allow abuse. Contractors helping each other is basically industry standard already but the existing rules can be used to penalize contractors for other reasons. I would be happy to get together a few electrical contractor to respond and make a plan if further information is needed. Thanks!

**Please provide your first and last name** Sean Teini

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

37-1-131: Duties of boards and programs. I disagree with the plan to allow boards to make decisions without a quorum. The purpose of a quorum in this instance is to ensure that the majority agree with a decision, which protects the people affected by said decision. I firmly believe that even though it can be inconvenient, a quorum is a level of protection that should not be removed. ||31-1-304: Licensure by reciprocity. The new proposed wording would make licensure easier for workers to obtain a Montana License. I disagree with this plan because our license requirements are in place to ensure the health and safety of the public. If we allow people to obtain a license without meeting requirements in place for the people of our own state, we are lowering standards of what it means to hold a license. We are also putting native and local Montana workers at a disadvantage. If someone raised in Montana needs to have more stringent requirements, then someone from out of state needs less, our local workers will be less valued while they also have more education expense. Montana license standards need to protect workers from Montana. ||Title 37 New Section 6: Military Spouse Temporary License. While I am happy to see the State of Montana provide and support our military (for example: 33-18-217 Military discount exemption; 33-1-138 Active Military Exemptions), I disagree with the Military Spouse Temporary License. The New Section 2 already ensures that an applicant will have been issued a license within 30 days for all routine applicants (which nearly all military spouse applications would be routine). I think this New Section 6 is unneeded and again puts Montana workers at a disadvantage. We should be holding all people licensed to the same standards, this is important to protect health and safety. ||\*\*If all licensees are not required to have the same education, exams, and continuing education, there WILL be gaps in knowledge that can put the public at risk. I do not think it is wise to allow workers from other states with LESS education to be licensed more easily. I not not agree with reciprocity where the other state has more lax requirements. I think we need to uphold a good standard for all workers in Montana so that our work is to a high standard, safe and is valued by the public for those qualities.\*\*

**Please provide your first and last name** Kathleen Doherty

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232691  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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On Page 326 |DO NOT STRIKE THIS LANGUAGE! ||"However, an unlicensed person may not use the title "landscape architect", "landscape|architecture", or any description tending to convey the|impression that the person is a licensed landscape|architect unless the person is licensed as provided in this|chapter. ""||This is the language that helps the general public understand that Landscape Architecture is a licensed profession. Letting anyone use the title means that the public must investigate the nature of that persons use of the title on their own. How would the public know? These revisions are a disgrace and lend credence to deceit and soft lies.||The title Landscape Architect must bear weight and be held distinct from other terms such as: horticulturist,|nursery operator, landscape nursery operator, gardener,||landscape gardener, landscape designer, landscape artist,||landscape contractor, or land use planner, ||

**Please provide your first and last name** Troy Scherer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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I support the recommendations submitted by the Montana Academy of Nutrition and Dietetics to modernize nutritionist license in Title 37 Bill Ver 3. Included in the revisions are the following, written in italics:|Section 111 Section 37-25-102, p.204|"*37-25-102 Definitions*|- Include medical nutrition therapy as a new definition: "*Medical nutrition therapy*" means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions. |- Include "*and intervention*" in the definition of nutrition counseling: "*Nutrition counseling and intervention*"|- Revise the definition of nutritionist. "*Nutritionist*" means: an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy.|Section 112 Section 37-25-302, p. 205|- Revision: "*37-25-302. Nutritionist license required.*|An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37, chapter 1.|Section 113 Section 37-25-303, p. 206|- Revision: "*37-25-303. Qualifications for nutritionist license.*|An applicant for licensure as a nutritionist shall have current, valid registration from the Commission on Dietetic Registration, or its successor organization, subject to the commission's accreditation by the national commission for certifying agencies.||Medical nutrition therapy is of key importance to my work as the leader of a native led nonprofit that employs registered dietitians to provide nutrition counseling and education activities addressing food/nutrition insecurity, hunger and the chronic diseases that plague our population at a higher level than many Montanans. To ensure quality MNT for our community members the nutrition licensing needs to be clearly stated as shown in the statements for each section above.

**Please provide your first and last name** Nonie Woolf

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232693  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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Section 18 section2-15-1743|I am representing the Montana Funeral Directors Association, who represent the funeral industry and its customers.|MFDA opposes the draft bill as written.|Two provisions the association opposes| a) The proposal that would prohibit a board member on the Montana Board of Funeral | Service from also serving on the board of the Montana Funeral Directors Association|MFDA is concerned this provision likely may violate the 1st Amendment as the state has no legitimate basis to prohibit persons from association with trade associations in order to serve on the regulatory board.|We would ask this provision be removed from the draft| b) Take the power of the purse away from the board and give it to the department.|This is a change to the current law and MFDA sees no good explanation for why this is being proposed. Boards are and should be independent decision makers, keeping the proper role of the department to administration purposes. We ask this provision be struck from the legislation.|Montana Funeral Directors is more than willing to work with the department on revision and improving the legislation.

**Please provide your first and last name** Terri James

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I have had the pleasure to meet and work with tradesman from all over the United States throughout my career as a plumber in the state of Montana. I would often ask about licensure protocols in the states that these workers had come from, and nearly all of these conversations had two common points of view. The workers from areas with more restrictive boards and licensures protocols all felt Montana was on the cusp of being too easy, while the workers from less restrictive states stated that they had wished their home state was more like Montana's. The tradesman from less restrictive states felt that the quality of the work produced suffered, as well as wages once licensure protocols became soft. It is my concern that if Montana chooses to adopt the changes stated in this draft, the quality of work for everyday Montanans will suffer, which may lead to possible life safety hazards.

**Please provide your first and last name** Ryan Doherty

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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The proposed first sentence in paragraph two of NEW SECTION three, sets up a new partisan political system likely to result in unknown negative consequences, including but not limited to the misguided advancement of an extreme partisan political agenda. The professional board and each and every board member will be at the complete caprice of the governor. ||Therefore, the following sentence must be removed from the proposed draft bill: ""(2) The governor shall have the authority to remove members of the board with or without cause. || If passed as proposed, this 16-word sentence represents a seismic shift from past practice that is not in the interests of professionals or the public. Instead, it represents undue authority, power and influence for the governor over both the board and board members. In my opinion, this sentence represents a would-be emperor, hoping to expand unneeded controls over their perceived empire. |For example, as a possible result of establishing such a partisan political system, I offer the following facts involving the horrific deaths of six children burned alive in the rear portion of a van driven by their father Duane ""Scott"" Willis with his wife, Janet, on Interstate-94 near Milwaukee on Nov. 8, 1994 ( see p. 5 of 2003 United States Dept. of Justice Dec. 17, 2003 press release). ||The children were burned alive and killed when a 42-pound tail-light assembly fell off a commercial truck and punctured the gas tank of their van, igniting the fire in the rear of the vehicle. ||The commercial truck was driven by an unqualified driver who had illegally obtained his truck driver's license because he was affiliated with a trucking firm middle-man and corrupted Secretary of State officials. Secretary of State officials were under great pressure to engage in improper political fund-raising activities while working under former Illinois Governor and Secretary of State, George Ryan. He was charged, tried, convicted and imprisoned for his creation of such a partisan political system. ||Please avoid allowance for creating a similar system by omitting the aforementioned sentence. ||Upon the indictment of Ryan in 2003, Tammy Raynor who worked as an uncorrupted Republican patronage worker and Secretary of state official remarked in the Dec. 17, 2003 edition of the Chicago Tribune: ""No longer will our employees have to go to work in fear, have to make a moral decision every time they punch in, or have to contribute money they probably can't even afford just to keep their jobs."" |

**Please provide your first and last name** Jeffrey Havens

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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Title 37 Bill - Ver. 3 - Page 245||Suggested change:||1A. ""have a degree from a postsecondary institution that meets the academic standards required for athletic training certification by the Board of Certification, Inc.""||Reasoning: The profession of athletic training is in a transitional period from the entry level degree being at the baccalaureate level to a masters degree being needed to obtain national certification. To hold national certification as an athletic trainer, one must meet specific academic standards mandated by the Board of Certification, Inc. Making this change will update the current language to be consistent with the current educational requirements of the athletic training profession, while still honoring past academic standards needed for certification.

**Please provide your first and last name** James Capp

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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The board for clinical laboratory science should include one Pathologist member. This is the Laboratory Director for all clinical facilities and should be included as a board member in the new makeup in addition to a member at large and practicing professionals.

**Please provide your first and last name**

Cara Bushmaker

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Current licensed professional in MT

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The proposed first sentence in paragraph two of NEW SECTION three needs to be removed from this proposal. The governor should not have this complete and unchecked power over the board members, and should not be able to remove board members without cause. This phrasing would keep board members in a subservient position, not wanting to be tossed out by making a wrong move or speaking out of line. This is not how the board should operate. ||Therefore, the following sentence needs to be removed from the proposed draft bill: ""(2) The governor shall have the authority to remove members of the board with or without cause. ||If passed as proposed, this sentence represents a seismic shift from past practice that is not in the interests of professionals or the public. Instead, it represents undue authority, power and influence for the governor over both the board and board members. In my opinion, this portion is unjust, unnecessary, and needs to be removed from the proposal.

**Please provide your first and last name** Kira Flagstead

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Regarding Board Consistency Reform: Section 7. Section 2-15-1732 , MCA, is amended to read:"2-15-1732. Board of dentistry. (1) There In accordance with [Section 1], there is a board of dentistry.(2) The board consists of eight members:|(a) four dentists,;|(b) one denturist,;|(c) two dental hygienists,; and|(d) one public member| |In Montana there are more licensed dental hygienists than there are dentists. In my opinion it would serve the board and public well to have equal representation for the two separate professions. |The Board of Dentistry has a history of restraining trade of other professionals. The Board of Dentistry is currently under Active Supervision due to one of these restraints. |Please consider equalizing the representation of the professions on the Board of Dentistry. ||Respectfully Submitted, |Clancy Casey, RDH, BS, LAP|

**Please provide your first and last name** Clancy Casey

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Regarding Licensure Mobility and the mental health counseling profession, the American Counseling Association is now pursuing mobility through ""Counseling Compacts"" (<https://counselingcompact.org/>). This may help with the red tape, and would greatly help counseling professionals in MT. Red tape might be reduced if, once the compact is established for MT, there is less need for MT to review renewals.

**Please provide your first and last name** Ryan Rominger

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Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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The proposed first sentence in paragraph two of NEW SECTION three, sets up a new partisan political system likely to result in unknown consequences in the future, The professional board and each and every board member will be at the complete caprice of the governor. ||Therefore, the following sentence must be removed from the proposed draft bill: ""(2) The governor shall have the authority to remove members of the board with or without cause. ||If passed as proposed, this 16-word sentence represents a seismic shift from past practice that is not in the interests of professionals or the public. Instead, it represents undue authority, power and influence for the governor over both the boards and board members. Members of the profession would have little say in what happens to their board members and ultimately their professions.

**Please provide your first and last name** Sue Cozzens

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232702  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the thoughtful revisions and New Section in licensing laws. My comments will be pertaining to Board Consistency Version 2. In 24-8-402 (3) my concern is regarding the regulation of employees by employers who gain financially from that relationship. Additionally, I anticipate another profession will be seeking licensure in dentistry in future years, no representation may create another active supervision finding. Regarding 24-8-402 (4) One public member on the Board of Dentistry is the father of an active in advocacy dentist. Thank you for seeing this as a conflict of interest, seeking disclosure and disallowing such appointees. New Section. Appointment-Qualifications-Terms. Thank you for reducing the term time and setting limits. I would also ask that clinical examiners NOT be allowed to serve as board members. Regarding 2-15-1732 (2), I would ask for equal number of dentists and dental hygienists based on existing licensee data on the number of each provider type and on past active supervision findings. Dentists know surgical and restorative care, dental hygienists know prevention and while scope may overlap that does not mean there is not a conflict of interest financially.

**Please provide your first and last name** Tonette Hollingsworth

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please have your website designer remove this continuous pop up requesting solutions for this thing I don't actually need to know about. I need to be able to access the Board of Medicine website instead of trying to scroll past a popup that takes up 2/3rds of the screen, intermittently interrupting my work. It makes the entire website impossible to use. My suggestion is to fire your web designer and take this scrolling pop up down so the general public may access other points of information.

**Please provide your first and last name**

Jamie Phifer

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Current licensed professional in MT

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Because Speech-language pathologists and audiologists and their assistants provide medical services, it is imperative that SLPs, Audiologists, and their assistants be licensed and therefore regulated. ||SLPs in in Montana currently require a master's degree while audiologists require a clinical doctorate. It would be criminal and unethical to let anyone else represent themselves as a SLP or audiologist without the highly specialized training because of the consequence that could come to the consumer such as medical harm.||Because SLP and audiology assistants work under the license of SLPs and audiologists, it is critical that there is licensure and regulations because without oversight, support staff can be over-extended by administrators putting SLPs and audiologists at risk because they work under their licensure.

**Please provide your first and last name** Jennifer Schoffer Closson

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: PTA with out of state license

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reciprocity without so many fees.

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**Please provide your first and last name** Daniel McNeill

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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The section below needs to be reworked. I've watch Gianforte pull highly qualified and experienced people off the TAC for no apparent reason (It actually looks punitive and political.) .|(2) The governor shall have the authority to remove|members of the board with or without cause. A board member |who misses three meetings over a period of one year without |good cause shall be removed from the board automatically.

**Please provide your first and last name**

Shannon Walden

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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To: Department of Labor and Industry ||From: Montana Dental Hygienists' Association ||Date: October 21, 2022 ||RE: Testimony on the Governor's Red Tape Reduction Initiative| |The MDHA would like to thank the Department and the Governor's Office for the thoughtful drafts presented. As a member organization of the Coalition for Modernizing Dental Licensure, we are actively engaged in improving portability and licensure compact development. Additionally, we agree that programmatic staff should have adequate authorities to administer licensing efficiently as outlined in Title 37 Bill - Version 3 and Enforcement - Version 3. ||The MDHA offers the following testimony on the proposed draft Board Consistency - Version 2. ||24-8-402 (3) ||We do not agree with the proposed language regarding the addition ""the inclusion of an additional license type to be regulated to an existing board may not result in adding that license type as a member of the board if the scope of practice of the newly regulated license type is within the scope of an existing professional board member position on the board."" Licensees should be regulated by peers, not employers. Regulatory control of one profession by another, even when scope of practice may overlap, may result in a conflict of interest. This has been demonstrated at the Board of Dentistry (BOD) in active supervision findings. ||24-8-402 (4) ||We concur with the new language, while acknowledging a conflict of interest in a recent public appointee to the BOD. ||NEW SECTION. Appointment- Qualifications - Terms 1-10 ||We concur with the new language. However, we would ask for a definition of ""examination committee."" Nearly every member of the Board of Dentistry is an examiner for the regional clinical testing agency. We would ask that examiner positions also be included as a conflict of interest. ||Justification: As the Initiative strives for reduction of burdens on providers, board members should not have power to prevent progress. Nationally, clinical examinations are being scrutinized as an inadequate judgement of clinical skills. Having board members as employed examiners may present a conflict of interest in removing the requirement for clinical examinations. Removal of regional clinical examination requirements is already being proposed by the Coalition and was presented to the Board of Dentistry during 2022.||NEW SECTION. Section Board Organization - Meetings - Compensation 1-4 ||We concur with the new language. ||2-15-1732.?Board of dentistry ||2(a) three dentists; ||2(c) three dental hygienists; and || ||The MDHA concurs with the reduction in number of Board members but offers the proposed change in the draft to add one dental hygiene member and reduce the number of dentists to three. ||Justification: The number of licensed dental hygienists (1,002) currently out number dentists (892) and denturists (20+). Dental hygienist providers are educated to provide preventive services, the other provider types provide restorative and/or surgical services after the impact of inadequate prevention. During past board discussions and determinations, it became apparent that dentist members of the BOD do not value or fully understand the impact preventive care can have on improving the public's health. Dental hygienists should be judged and regulated by their peers in prevention. Additionally, dental hygienists are primarily employed by dentists, active market participants in dentistry - market participants that

financially gain from the dental hygiene profession working in their dental practices, financially gain from dental disease. Competition by dental hygienist market participants promoting prevention is a threat to that model. We are seeking equal representation to avoid conflicts of interest and modernize licensing to be more public health focused. ||We would also request to be invited to any meetings between organized dentistry and the Department in discussing Initiative activities related to the Board of Dentistry. |||| ||



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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: MT resident; DH Licensed in another state; Former State Board member is another state

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I agree with the reduction in the number of Board of Dentistry members in Board Consistency --Version 2 related to MCA 2-15-1732 to improve efficiency and reduce burden for licensees, but offer the proposed change in the draft to add one dental hygienist member and reduce the number of dentists to three. The structure of the Dental Board already includes combining three professional licensees, dentists, dental hygienists and denturists respectively. There is currently potential for dentist members to create bias around issues that would not authorize the full potential of preventive dental health services by RDHs since dentists are the employers who may want to keep the dental hygienist workforce available for their private practices. It is a revenue/profit issue, not a public safety issue. This potential conflict could be ameliorated by having an equal number of DDSs and RDHs on the combined Board of Dentistry, Dental Hygiene and Denturists. The name of the Board should reflect the licensees represented on the Board. There should be equal representation of DDS and RDHs based on number of each category of licensees. The number of licensed dental hygienists (1,002) currently out number dentists (892) and denturists (20+). Dental hygienist providers are educated to provide cost savings preventive services. The other provider types provide restorative and/or surgical services after the impact of inadequate prevention. Dental hygienists are college educated in programs approved by the American Dental Association, Council on Dental Accreditation; are required to pass national boards, regional clinical and didactic board examinations, as well as the state jurisprudence examination. Dental hygienists should be judged and regulated by their peers in prevention. Equal representation to avoid conflicts of interest and modernize licensing will promote the public's oral health.

**Please provide your first and last name** Noel Paschke

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232710  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Title 37 Bill-Version 3 and Enforcement-Version 3 As a licensed Dental Hygienist with a Limited Access Permit I want to thank the Department and Governors office for the drafts presented, however, to continue providing access to care in limited access settings, I feel the public would have a better chance at care if Dental Hygienists were not restricted in our trade. The Board of Dentistry has, and continues to limit our ability to practice what we're licensed to do. They don't value or understand the impact preventive care can have on improving public health. I approve of the new language you are proposing, but I would prefer |2-15-1732 Board of Dentistry reduced to 3 Dentists, add another Dental Hygienist so there are 3 Dental Hygienists, 1 Denturist and 1 Community member. |Thank you for considering my requests.

**Please provide your first and last name** Karen Thomas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232711  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the thoughtful drafts presented in the Red Tape Reduction Initiative. I agree with the reduction in the number of Board of Dentistry members in Board Consistency --Version 2 related to MCA 2-15-1732 to improve efficiency and reduce burden for licensees, but offer the proposed change in the draft to add one dental hygienist member and reduce the number of dentists to three. |The number of licensed dental hygienists (1,002) currently out number dentists (892) and denturists (20+). Dental hygienist providers are educated to provide preventive services, the other provider types provide restorative and/or surgical services after the impact of inadequate prevention. Dental hygienists should be judged and regulated by their peers in prevention. Equal representation to avoid conflicts of interest and modernize licensing will promote the public's oral health. ||Please allow the Dental Hygienists of Montana to have at least equal representation on the Dental Board or allow them to have their own Board- to be regulated by their peers, not their employer (definite conflict of interest).

**Please provide your first and last name** Carla McColly

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232712  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I believe that temporary licenses can be issued with attestation and submission of qualified training transcripts. In the aspect of private security licensing takes too long to retain employees waiting on acceptance of a license app. This could be easily created and enforced as applicants requiring further review or denial would already have known why just as they would have answered the questions for background. Further it moves liability to security company to understand their hired employees before working them. Licenses should be required for all security personnel and rules enforced against companies using "crowd control" to bypass licensing requirements. Training should have structure to ensure the same standard is produced by every guard.

**Please provide your first and last name** Andrew Lauckner

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232713  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Unlicensed real estate assistant in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

My comment is in regard to the section of the Drafts entitled ""Increasing Licensing Mobility."" I have been in the process of testing for my MT real estate salesperson license, and the closest testing site is a 2.5 hour drive away from where I live, in Big Sky, MT. ||My suggestion would be to increase the available locations of testing centers for licensing in order to optimize your goal of increasing licensing mobility and access. For example, Bozeman has over 1,500 licensed realtors, which is almost 30% of the licensed real estate professionals in the state of Montana, but there is no testing center offered. It provides an unreasonable barrier to entry for people who live in more remote areas.

**Please provide your first and last name** Amanda Squire

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232714  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the thoughtful drafts presented in the Red Tape Reduction Initiative. I agree with the reduction in the number of Board of Dentistry members in Board Consistency --Version 2 related to MCA 2-15-1732 to improve efficiency and reduce burden for licensees, but offer the proposed change in the draft to add one dental hygienist member and reduce the number of dentists to three. ||The number of licensed dental hygienists (1,002) currently out number dentists (892) and denturists (20+). Dental hygienist providers are educated to provide preventive services, the other provider types provide restorative and/or surgical services after the impact of inadequate prevention. Dental hygienists should be judged and regulated by their peers in prevention. Equal representation to avoid conflicts of interest and modernize licensing will promote the public's oral health.

**Please provide your first and last name** Rosaleen Handl

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232716  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

My Concern: I want to be certain that the Board of Physical Therapy Examiners (BPTE) has the same rule making authority with the proposed legislation (Version 3, 10/3/22, Title 37 Reform) that is currently contained in the BPTE statute (37-11-201(1), MCA).||The current statute, 37-11-201, MCA: ""General Powers-Rulemaking. The board [BPTE] may (1) adopt rules to implement this chapter [Title 37, Chapter 11 - Physical Therapy]."" This statute is very broad.||The proposed amendment, (Version 3, 10/3/22, Title 37 reform, Section 36 [draft pages 80-82]), that will cover all licensing boards and programs, provides: ""Section 36. 37-1-319... Rulemaking authority of boards and programs. A board....may adopt rules:... (8) [pg. 82] necessary to administer and implement the provisions of any board....and regulate the conduct of persons under board....jurisdiction.""||My question: Who decides what is ""necessary [emphasis added] to administer and implement the provisions of any board...?""||I strongly support the ""Red Tape Reduction Act"" goal of reducing state regulations. But, who decides which rules are ""necessary?"" No one would propose a rule that they believe is UN-necessary. Does the Montana Department of Labor make that decision? Does the district court (or eventually the Supreme Court) make that decision?|

**Please provide your first and last name** Jim McLean

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232717  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Ver. 3 - 10/3/22 - Title 37 Reform|Version 3 has added an additional repeal of 26-102. Can you please clarify how deletion of this statute was determined- and how it meets the goals of: REVISING|TERMINOLOGY, REMOVING REDUNDANT PROVISIONS, AND REVISING|RESPONSIBILITIES OF THE DEPARTMENT AND BOARDS; ||This statute is specific to this profession and may go beyond the goal of this bill to standardize across boards. ||Appreciate your response and clarification and or restoration of 37-26-102. ||Also, the following comments were submitted via this portal previously and awaiting comment. ||Thank you, |Ingrid||Comment submitted 10/13/22 12:43 pm|<https://boards.bsd.dli.mt.gov/educational-sessions>||Draft for Public Comment Ver. 2 - 10/3/22 - Board Consistency Reform|Page 10|Section 5. Section 2-15-1730, MCA, is amended to read:"2-15-1730. Alternative health care board -- composition|-- terms -- allocation. ||QUESTION 1: DOES THE FOLLOWING MEAN THAT THE PUBLIC MEMBER COULD BE A LICENSEE NOW, OR IS THIS RESTRICTION MOVING SOMEWHERE UNDER A GENERAL STATUTE FOR ALL BOARDS? |(b) one public member deletes: xx""who is not a member of a profession|regulated by the board; ""xx and ||QUESTION 2: DOES THIS MEAN THAT THIS PHYSICIAN MEMBER COULD BE AN OUT OF STATE PHYSICIAN?|(c) one member who is a xx (deletes ""Montana"" )xx physician whose practice|includes obstetrics. ||QUESTION 3: DOES THIS MEAN THAT BOARD MEMBERS WOULD. NO LONGER BE APPOINTED BY THE GOVERNOR AND APPOINTED BY THE SENATE? |(2) The board consists of six members xx DELETES"" (appointed by the|governor with the consent of the senate.)"" xx The members are:|

**Please provide your first and last name** Ingrid Lovitt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232718  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Thank you for the thoughtful drafts presented in the Red Tape Reduction Initiative. I agree with the reduction in the number of Board of Dentistry members in Board Consistency --Version 2 related to MCA 2-15-1732 to improve efficiency and reduce burden for licensees, but offer the proposed change in the draft to add one dental hygienist member and reduce the number of dentists to three. |The number of licensed dental hygienists (1,002) currently out number dentists (892) and denturists (20+). Dental hygienist providers are educated to provide preventive services, the other provider types provide restorative and/or surgical services after the impact of inadequate prevention. Dental hygienists should be judged and regulated by their peers in prevention. Equal representation to avoid conflicts of interest and modernize licensing will promote the public's oral health. |

**Please provide your first and last name** Julie Barnwell

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232719  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

You need to overhaul the onerous Professional Engineer comity application process. Even though I have an NCEES record, and was licensed in 17 states when I applied for licensure in Montana I had to provide proof of licensure in other states and give professional work history / references / education data which is already found in the NCEES record. It took 39 days for me to get a PE license in Montana. I am now licensed in 36 states, and in 23 of those states I was licensed faster than Montana.

**Please provide your first and last name** Paul Alexander

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232720  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency Reform Version 2 (10/3/22)|Section 3 (5). This is on page 7 of the PDF|||There was public comment at our recent board meeting about this section regarding concerns that it may be more difficult to recruit board members if we are limiting membership by not allowing officers or those in leadership in state or national professional associations to be eligible to be on a board. ||I am wondering what the impetus was for this idea so I can decide whether I agree or disagree.

**Please provide your first and last name**

Merna Terry

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232721  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I support the recommendations submitted by the Montana Academy of Nutrition and Dietetics to modernize nutritionist license in Title 37 Bill Ver 3. Included in the revisions are the following, written in italics: ||Section 111 Section 37-25-102, p.204|*"37-25-102 Definitions|- Include medical nutrition therapy as a new definition: "Medical nutrition therapy" means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions. |- Include "and intervention" in the definition of nutrition counseling: "Nutrition counseling and intervention"|- Revise the definition of nutritionist. "Nutritionist" means: an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy.*||Section 112 Section 37-25-302, p. 205|- Revision: *"37-25-302. Nutritionist license required.|An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37, chapter 1.*||Section 113 Section 37-25-303, p. 206|- Revision: *"37-25-303. Qualifications for nutritionist license.|An applicant for licensure as a nutritionist shall have current, valid registration from the commission on dietetic registration, or its successor organization, subject to the commission's accreditation by the national commission for certifying agencies.*||As a Registered Dietitian and Licensed Nutritionist in Montana, I support efforts to reduce red tape and adapt to the changing landscapes we work in. However, it is vital that we continue to protect public safety by ensuring that Medical Nutrition Therapy (MNT) remains protected by licensure and board oversight as this is an arena where true medical harm can take place. Because of the areas in which MNT is delivered, it remains crucial that nutritionist licensure continue to be housed within the BOME.

**Please provide your first and last name** Paige Sadowski

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232722  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comment on BBH Consolidation draft New section 5. Exemptions from licensure. I do not agree with or support Parts a b or c. of section 5. |Part (a) of section 5 ""does not prohibit"" people from other professions to perform counseling and behavioral health services without being licensed as long as they don't represent by title that they are engaging in the practice of behavioral health. |Part (b) ""does not prohibit"" people to offer a service or use an official title by federal, state or local (etc.) volunteers as duties of the office or position.|Part (c) ""does not prohibit"" employees to offer activities or services for the benefit of their employees. |Discussion: Allowing people who do not have licenses (or are not working toward licensure as provided below in section d) in the mental and behavioral health professions to engage in offering services or activities is neglectful dangerous. Given that our State ranks in the highest per capita for deaths by suicide it is grossly irresponsible and extremely dangerous to allow non-licensed laypeople to engage in any behavioral health activities with at risk people. And given they are not trained/licensed how would they assess if any of the people they are offering services or activities to are at risk? Allowing a person from another profession to do the work of a licensed behavioral health worker (who are required to have thousands of supervised hours) would be like having an architect do the work of an engineer. Each profession has it's own focus that keeps the building from falling to the ground, The same is true of Licensed behavioral/mental health workers vs other professions.

**Please provide your first and last name** Melody Rice

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232723  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The MED for emergency responders makes sense, and I'm in favor of the proposed changes. Additionally, there is oversight by a medical director at the local level who has the ability to reach out to the oversight contact if questions arise.

**Please provide your first and last name** Shaun Opp

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232724  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This comment has to do with bringing to the attention of Montana Law makers that it is not currently required in The state of Montana for Surgical Technologist to be nationally certified. This is a huge detriment to our state community. | Imagine your loves one going into surgery, scary isn't it. Now imagine the person at the right hand of the surgeon having no schooling or proper training in sterile techniques, anatomy and physiology, surgical techniques. | When patients are in surgery they are at their most vulnerable. This is exactly when it is imperative to have someone who has gone through and graduated from an accredited program and obtained the national certification from Association of Surgical Technologist. || Please consider adding this to the docket of bills that need to be passed this coming session.

**Please provide your first and last name** Breanna Caras

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232725  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I understand updating language within a piece of legislation. I think that it would be better if there was a way to submit CEs in lue of just a random audit. I think if there was a way to reduce turnover that would help immensely. I am unsure if revamping the legislation would help to improve anything. I think if there was less turnover at the licensing agency there would be instant elimination of red tape. I don't if Montana's process is any less different than other States. At least from my experience. I would rather focus on the health and safety of patient's and staff. For example, I would rather see a more focus on regulations within a hospital than anything else. More patient based outcomes and staff retention. You focus on those then everything will fall into. I don't think it should take an inspector to issue a cease and desist order to redirect things to where they should be. I don't see the red tape, .I think we all make mistakes but it's the habitual behaviors that can be hard to endure. I have always thought of myself being a servant to patients and staff and being Prostaff and Propatient

**Please provide your first and last name** Todd Keller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232726  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Version 1 repeal of medication aides: Being an LPN in a critical care access hospital, medication aides are crucial to our care. If this does go through, may I suggest better availability for online nursing and nursing bridge programs to fill this need.

**Please provide your first and last name**

Kender Beeler

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232727  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As A Licensed architect in this state for many years I have the board , made up of design professional be a key element in the life safety of our communities throughout the state. I see dissolving this board for a political reason ... RED TAPE will not only hurt our profession but put the safety of the public in danger. After a few collapses or other dangers we will be looking at putting a professional board together again.

**Please provide your first and last name**

Craig Bergsstedt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232728  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft 3 of Title 37 reform 37-34-303 Both the ASCLS and ASCP have now agreed on one official title to be used throughout the professional organization as well as the ASCP Board that provides the testing for qualification. The agreed upon names are Medical Laboratory Scientist (MLS) 4 year BS degree, Medical Laboratory Technician (MLT) 2 yr AA degree, Medical Laboratory Assistant (MLA) 3 month program or on the job training and then challenge ASCP board examination. Please bring Montana licensure into this format as having on the different titles makes it difficult to get correct understanding of necessary qualifications. The Dept. of Labor and Industry has continued to lump both MLS and MLT into the same wage bucket making the national wage skewed resulting in MLS wages below what they actually are or should be.

**Please provide your first and last name** Michele Adams

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232729  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Why one has to wait Until November 1 st. To renew your APRN.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

APRN renewal, when the notice arrives from the nursync, one has to wait until November 1 st. To renew the license. This is one reason, that the licenses get lapsed. This is plane ridiculous. When, we get the notice to renew, then we should be able to renew it. No questions asked.

**Please provide your first and last name** Kirit Patel

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232730  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In reference to the Property Manager/Timeshare License changes. As a Licensed PM I support these changes. When first started, throwing PM's in with salespersons and brokers was a good start. But there are many issues that are specific to one role or the other. To now take the PM issues completely into a separate section will further clarify the roles.

**Please provide your first and last name**

Denise VanArtsdale

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232731  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I object to the following changes:|First, in Ver. 2 - 10/3/22 - Board Consistency Reform Page 41 Section 29. Section 2-15-1761, (1)|Do not remove the word ""licensed"" from 1, (a) AND 1, (c): two licensed architects|Licensure is critical for board members. ||Second, in Ver. 3 - 10/3/22 - Title 37 Reform Page 326 Section 183. Section 37-66-105 (2)|Do not remove this language. Licensure should remain a protected practice - allowing the general public to call themselves a ""Landscape Architect"" without any training, education, or experience will lead to mistakes, injury, safety violations and unethical behavior. Keep the following in title 37: |However, an unlicensed person may not|use the title ""landscape architect"", ""landscape|architecture"", or any description tending to convey the|impression that the person is a licensed landscape|architect unless the person is licensed as provided in this|chapter.

**Please provide your first and last name** Mark Garff

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232732  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Thank you for the opportunity to comment. In looking through "Title 37 Reform" draft 3, I find it difficult to see where there is any meaningful red-tape reduction. All I see is the Department granting itself more and more "state powers", as it seems all bureaucracies do, given enough time and opportunity. Example? Just look at all the "New" Sections that were in law or code before. |

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**Please provide your first and last name** Alan Gilda

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Form Name: Comment Submissions - COPY  
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Browser: Unknown  
IP Address:  
Unique ID: 1052232733  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

If the Board of Sanitarians is changed to Program Management will the fees be reduced? |If the Board of Sanitarians is changed to Program Management, how will the disciplinary process be the same as it currently goes through the Board?|If the Board of Sanitarians is changed to Program Management, who will do the review of new Sanitarians In Training applications, and who will decide if they meet the criteria?|If the change is to Program Management, can there be a way for those licensed through the National Environmental Health Association and other states to apply for reciprocity automatically?

**Please provide your first and last name**

Sarah Robbin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232734  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Twice over current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I don't find my submittal in the drafts. I wrote and submitted a proposal that DLI require more ""skin in the game"" by accusers of a licensee having to appear before the governing entity deciding on a complaint. Any time a licensee is scrutinized by a Board, the accuser should have to be present to the same extent the accused is present. Frivolous complaints, like the two I have had, are time consuming & demoralizing. Accusers need to be held more accountable !! DLI needs to treat licensees like they are ""innocent until proven guilty"" by making stronger requirements of the accusers.

**Please provide your first and last name** Tony Novotny

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232735  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Med Board Changes, Page 3, 3(g)|Removing the Emergency Care Providers from the Board of Medical Examiners to a Program is a terrible idea. Every Emergency Care Provider must have a Medical Director who oversees their practice. The range of skills from an EMR to Paramedic is significant. I am aware that much of the Board's time is spent dealing with the ECPs, but the role they play in our state is significant. With the elimination of the State Medical Director (which was a poor decision in my opinion), there has been a significant level of misinformation, confusion and lack of direction for many of the state agencies providing emergency services. Montana had an exemplary model for emergency services that has been eroded from the top down. I don't think a Program will be able to efficiently and appropriately handle the workload involved in keeping our emergency services working and running in top performance. ||I was the acupuncturist on the Medical Board for 8 years, and also served on the Screening Panel. I am aware of the situation with the ECP issues and concerns. Therefore, I am extremely concerned with this proposal.

**Please provide your first and last name** Tanja Brekke

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232736  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

On the change from Board to Program for Sanitarians, what will the exam recommended by the department be? I think there has to be at least a standard, the NEHA REHS exam.

**Please provide your first and last name** Sarah Robbin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232737  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Changing from a Board to Department for Sanitarians: There is a penalty process, but no language saying they have to stop practicing until they become licensed.

**Please provide your first and last name** Sarah Robbin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232738  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Removal of the Clinical Laboratory Science Board and replacing it with a "department" is short-sighted, dangerous and asinine. There must be a Clinical Laboratory Science Board staffed with people who actually have knowledge of Clinical Laboratory Science; not a "department" with wide Governor's discretion of who staffs it, without guarantees of knowledge of Clinical Laboratory Science. ||The only remedy for this draft is to discard it entirely.

**Please provide your first and last name**

Max Mauch

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232739  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As A Licensed architect in this state for many years I have the board , made up of design professional be a key element in the life safety of our communities throughout the state. I see dissolving this board for a political reason ... RED TAPE will not only hurt our profession but put the safety of the public in danger. After a few collapses or other dangers we will be looking at putting a professional board together again.

**Please provide your first and last name**

Craig Bergsstedt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232740  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Harrison Faulk

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232741  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Stacy Molt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232742  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Alicia Camel

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232743  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As stated below, I am VEHEMENTLY against the ATR Board to Program portion of the ""Red Tape Initiative""|Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Robert Childress

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232744  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** Ethan Pyron

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Comment Submissions - COPY  
December 30, 2022 5:02 pm  
Unknown  
1052232745

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

""Version 1 - ATR Board to Program""||On behalf of the Montana Athletic Trainers' Association, our hundreds of members, and the thousands of patients we treat, I am writing in strong opposition to the Montana Department of Labor and Industry's recently released drafted recommendation to dismantle the Board of Athletic Training. | |Athletic trainers are licensed, board certified health care professionals with, at the minimum, a master's degree in athletic training from an accredited institution. Often times, athletic trainers are confused with personal trainers but the two professions are very different. Following a medical-based model, athletic trainers provide comprehensive patient care in five domains of clinical practice. Athletic training encompasses the prevention, diagnosis and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Examples of the many conditions we treat include traumatic brain injuries, sudden cardiac arrest, and exertional heat illness. Across the United States, in addition to practicing in traditional sports team settings, athletic trainers work in performing arts, with public safety organizations, in occupational health, and with the military. The American Medical Association recognizes athletic training as an allied health care profession, and athletic trainers are included under the allied health professions category, as defined by the U.S. Department of Health and Human Services (HHS), and are assigned National Provider Identifier numbers (NPIs).||Dismantling the Board of Athletic Training puts our patients at great health risk. The Department would be removing oversight from health care experts who have extensive knowledge and understanding of the profession and our patients, and assigning jurisdiction to a bureaucratic system, where there is no guarantee that individuals working within the program would have the proper education, training, or credentials to adjudicate cases and make medical recommendations. If the legislature were to move forward with this change, athletic trainers would be governed differently than other health care providers. This modification would set Montana alone in opposition of licensing best practices and potentially drive health care professionals from the state. ||Please support athletic trainers and the health and safety of our patients by retracting your drafted recommendations. If you have any questions or would like additional information, please contact MTATA president, Paul Capp, at 406-868-6403. Thank you in advance for your time and consideration. |

Please provide your first and last name Paul Capp

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Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232746  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. I believe it to be unethical to put the lives of Montana citizens at risk when this process does not save the State any money at all.

**Please provide your first and last name** Chris Heard

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232747  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am writing in opposition to Version 1 - ATR Board to Program. Athletic Trainers are board certified and recognized health care professionals. We are not personal trainers. So by removing our board you are treating us different than every other health care provider profession. If you remove ours you better remove Physical Therapists, nurses, Physician assistant and Physician boards. |By removing our board of members who understand what an Athletic Trainer is you will be opening the door for serious harm to come to the thousands of patients we all see everyday. By removing our board it is more likely our profession will be infringed by non certified people calling themselves athletic trainers or ""trainers"" who are not qualified to treat patients. This is very concerning to me as a certified and licensed Athletic Trainer in Montana. I love this state and I don't understand how we could be thinking about making this bad of a decision on a medical provider board that goes against what almost every other state in the country does. The only way is that the decision makers have no idea what an athletic trainer is. And don't know that we are allied health care professional just like physical therapists, nurses, Physician assistants and doctors. They must think we are a personal trainer in your local gym. The difference cannot be greater. I ask please educate yourselves before you make this mistake and put thousands of peoples health in jeopardy. |For thee reasons and many more I must strongly oppose Version 1 - ATR Board to Program. |Keep our overseeing board and ensure the continued safety of the patients that we treat.

**Please provide your first and last name** Justin Halvorson

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232748  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Melissa Chandler

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Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232749  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Brett Ritter

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232750  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Klare Matthew

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232751  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Riley Ungaretti

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Browser: Unknown  
IP Address:  
Unique ID: 1052232752  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Debby Kittel

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232753  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Draft SAN Board to Program Page 4 - 37-40-101. Definitions. - |""Sanitarian in training"" definition is being removed. Does this mean sanitarians in training will no longer be allowed? If so, I oppose this decision. Many of our long-term and highly experienced sanitarians started out as sanitarians in training. Removing this option will cause the already small pool of potential hires to decrease even more.

**Please provide your first and last name**

Mercedes Overlie

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232754  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose version 1 ATR board to program. Section 1 ""37-1-401. I believe a board of Athletic trainers is essential to regulating the profession of athletic training in Montana. I did not see in the draft who would review any complain that is submitted but athletic trainers are the best qualified to review such claims. |Having had several complaints in the past few years the board has shown it is efficient at reviewing the claim and issuing a response. The athletic trainer's board is self funded so I see no reason to disassemble the board. The goal set out for this red tape initiative to restructure board governance states that it is looking at boards where a certification is not necessary and athletic trainers absolutely need to be licensed and a certification required due to the medical nature of the job and that some athletic trainers setting is in schools. We have no problem adhering to the standardized processes the red tape initiative has proposed but combining the board with another profession would put the health of our patients at risk.

**Please provide your first and last name** Maisie Cooj

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232755  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Amy Thoreson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232756  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Ethan Pyron

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232757  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Jackie Long

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232758  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I strongly oppose ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. ||

**Please provide your first and last name** Courtney Hicks

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Unique ID: 1052232760  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** John Ledyard

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232761  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

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Other: I am an RN and NHA-I teach at Great Falls College.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

November 2, 2022|Dear Members of the Legislative Reform Committee, |I am writing and asking you to strongly reconsider repealing the Medication Aide programs-Medication Aide I & II. These programs have not been utilized as they were originally intended several years ago. At the time I was a Nursing Home Administrator of the large facility in Havre and I didn't see the value in the program and initially opposed it. It didn't fit with my nursing background. |However, over the years I have seen the facilities that have used them and read the research conducted in several states. This alternative workforce has proved valuable. Now, more than ever, with this nation's critical, critical nursing shortage, I believe that Montana must not repeal this law but rather to reinforce the need for it. |I now work for Great Falls College, Life Long Learning Program and am the Clinical Coordinator of the Healthcare programs. We offer CNA, Paid Feeding Assistant, Medication Aide 1 & II, and HHA certifications. We work very closely with Vocational Rehab, Employment Services and other workforce development programs to assist individuals in training and work. In the 1.5 years that we have been offering these programs we have trained nearly 200 CNAs, a dozen HHAs, and are in process of offering Medication Aide II classes to Great Falls' largest health care employer. Their need is simple and straight-forward-they do NOT have enough nurses to take care of the residents. They reached out to us to help them and we are now training 7 Medication Aides. |We have also trained Medication Aides for one of the Assisted Living facilities here in town-they are awaiting testing. |I recently spoke to a CNA who left another assisted living facility because she was told she had to pass medications. She did so without any formal training and left that position because she felt so ill-prepared and unsafe. The Medication Aide I program for Assisted Living was initially passed in the hope that Assisted Living Facilities would use trained medication Aides to improve quality of care and safety for the residents. |Having standardized, structured programs with professional licensure for Medication Aide 1 & 2 accomplishes many goals:|1. Raises the standard of care and safety. The curriculum for these programs focuses on medication safety, narcotic safety, adverse drug reactions, and knowledge about the drug classifications. |2. Makes the individual professionally responsible and accountable and they must receive annual continuing education credits to maintain licensure.|3. Offers a career ladder to a valuable workforce. Some of the CNAs at the facility where are offering the class are taking the program because they recognize they need a change from the physical demands of the CNA work-yet they want to remain with their residents. |Removing these programs solves the wrong problem. Instead, we should continue to be creative and work to get more people into the workforce in diversified and well-trained fields. |Sincerely, |Lori Henderson, BSN, RN, NHA|

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**Please provide your first and last name** Lori Henderson

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IP Address:  
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Comment Submissions - COPY  
December 30, 2022 5:02 pm  
Unknown  
1052232762

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Board Consistency Reform Draft|  
• Section 19, subsection (2) (f) - the word "licensed" is stricken before professional members i.e. social worker, clinical professional counselor, marriage and family therapist. We understand this may be an effort to standardize the language but removing "licensed" may open these positions up to non-licensed individuals, such as candidates, and would create the opportunity for candidates to be responsible for regulating licensing rules without being licensed themselves. We believe fully licensed mental health professionals are best equipped to serve as board members and to speak on behalf of other licensed professionals. ||  
Board of Behavioral Health Consolidation |  
• Section 5, subsection (d) - "an activity or service of a student, intern, or resident in mental health counseling" - the reference to mental health counseling is too narrow and should be expanded to all professions. ||  
• Section 6, subsection (3) states that a candidate cannot take the exam until after completing the supervised experience requirements. This was the standard in most states many years ago, but many states now allow taking the exam before starting the clinical experience. We request that candidates be allowed to take the MFT exam prior to clinical experience being done which is the current practice in MT. The statute (37-37-201) lists the exam as a requirement but does not specify an order. Subsection 5 might need to be corrected as well. ||  
• Section 10, subsection (1) mentions being "actively" licensed. Is the word "active" used instead of "currently" for a specific reason? ||  
• Section 10, subsection (b) - The exam requirement for LMFTs is described as "prescribed by the board" whereas for the other licensees it is written as "passed an approved examination." We suggest that the MFT language be revised to align with the other licenses. Montana currently accepts two exams for LMFTs, one exam that is used in 48 other states and another exam that is taken by California LMFTs. We want to be sure that both exams continue to be accepted and believe the "passed an approved examination" language is broad enough to include both.||  
• Section 12, subsection (6)(b)(ii) and Section 13 subsection (3)(b)(i) - LMFT's should be added to the quality educator programs listed in these two sections of the bill to be consistent across all master's level licenses. |

**Please provide your first and last name** Andrea Foran

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232763  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Matea Barber

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232764  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

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**Please provide your first and last name** Cameron Barber

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232765  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against Version 1 ATR Board to Program. Licensed health care professionals need to have a governing body that is overseen by like professionals with the same education and knowledge of our scope of practice. Athletic Trainers are Medical Professionals with Master's degrees whose scope of practice is based on gold standards, best practice and scientifically, peer reviewed literature. All medical professions need regulation and state licensure. This is to ensure the health and safety of the patients in the State of Montana who are cared for by Licensed Athletic Trainers as well as a maintained level of professionalism expected from Licensed, Certified Athletic Trainers throughout the State.

**Please provide your first and last name** Gaudreau Gabriel

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232766  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Sola Yeager

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232767  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have been an ATC, LAT for close to 30 years now and have also served on the Montana Board of Athletic Trainers. I feel the profession of Athletic Training is severely underappreciated and grossly misunderstood an intact board provides credence and accountability to the profession and helps uphold professional integrity. I fully understand and appreciate the expense and amount of hours having an established board requires, but a true governing board filled with people of knowledge of scope and sequence is essential to help with matters regarding misfeasance, nonfeasance, and malfeasance. Licensed Athletic Trainers take pride in the job they do and are albeit essential and often extremely underappreciated. Resolving the board and downgrading the profession would be another black eye on the profession. After all you wouldn't ask a plumber to perform open heart surgery, but anyone can "tape" an ankle. Do the right thing and help one of the most overworked and underappreciated professions establish long term credibility going forward. It is my strong feeling the board need to be kept. I'm writing hoping you will find a way to feel the same. Have a good day and thanks for your time. Regards, Shawn Ruff, LAT

**Please provide your first and last name** Shawn Ruff

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232768  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Thomas Ebel

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232769  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Katlyn Norton

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232770  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name**

Teayre Klosterman

Form Name: Comment Submissions - COPY  
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Browser: Unknown  
IP Address:  
Unique ID: 1052232771  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** McKenzie Norton

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232772  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Tom Keiser

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IP Address:  
Unique ID: 1052232773  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Ashley Gamez

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Unique ID: 1052232774  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Mary Jo Norton

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232775  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Jim Norton

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Browser: Unknown  
IP Address:  
Unique ID: 1052232776  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name**

Valerie Moody

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Unique ID: 1052232777  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.||As the parent of a dedicated athletic trainer, if this change is implemented it would be a ""slap in the face "" to this profession. Athletic trainers are health care professionals with extensive education and training. They work long hours with pay that is not commensurate with their duties. I am asking that you carefully consider the effects on this profession if the change is implemented.

**Please provide your first and last name** James Capp

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232778  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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In regards to reducing red tape (and cost) I would like to request consideration for renewal each two years instead of every year for professional licenses. Currently (at least for Architects) we renew every year, but it seems we could do this every other year which would cut down on processing/billing by a good deal.

**Please provide your first and last name** Jason Egeline

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232779  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Linda Rayfield

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Director or member of an association connected with a licensed profession

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**Please provide your first and last name**

Hannah Kuracina

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Unique ID: 1052232781  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am against "Version 1 - ATR Board to Program" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.

**Please provide your first and last name**

Brianna Norton

Form Name: Comment Submissions - COPY  
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Browser: Unknown  
IP Address:  
Unique ID: 1052232782  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Judy Dolan

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Unique ID: 1052232783  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Mitchell Willert

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232784  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am all for reducing waste and making things more efficient, with that being said I think athletic training is a vastly misunderstood profession especially in conjunction with personal trainers. I have even seen personal trainers moonlighting or not correcting this distinction. Please consider the following statement in your decision process. At the very least make sure the people that are going to be completing these licensing positions are educated on each profession and utilize experts when making decisions. [Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""]

**Please provide your first and last name** Amy Tooke

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IP Address:  
Unique ID: 1052232785  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.||Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.||Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Nate Schieffert

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232786  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Other: Student

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Ashley Griffiths

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232787  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Valentina Mclaughlin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232788  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: I am a licensed professional and a member of an association connected to my profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft: Board of Behavioral Health Consolidation||sections 12 and 13:  
These sections relate to educators and do not seem relevant to the rest of the content in this draft, which is focused on board of behavioral health. I would need an explanation as to why they are included; otherwise I recommend they be removed from this draft and placed somewhere more relevant.

**Please provide your first and last name** Elizabeth Martin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232789  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name**

Tess Gorchesky

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IP Address:  
Unique ID: 1052232790  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Katherine Patch

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232791  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy

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**Please provide your first and last name** Jo Anne Capp

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232792  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Version 3: Professional Licensing|37-8-405: Professional Nursing|(2) Application fir Professional Nurse| a. Why would you not want the applicant to have a HS or GED ? Is this omitted because this would be part of the initial college of nursing application?| b. wording should be ""professional nursing curriculum from an accredited (rather than approved) college (rather than school) of nursing.||Medication I and II - I agree with the changes.||Nursing Home Administrator: |- concerned that ""of good moral character"" is scratched |- Why us there no requirement beyond high school for a position that manages and leads other practitioners and licensed professionals while managing oversight of vulnerable population?

**Please provide your first and last name** Sue Warren

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232793  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am currently the Board Chair of the Clinical Laboratory Science Practitioners, but I submit these comments as a member of the public. Removing the structure of the board for Clinical Laboratory Science seems like a massive mistake. As I understand it, licensing will still be a requirement for employment in Montana, however the licensing will be administered by DLI staff. That means our license fees, continuing education requirements, approved continuing education vendors, and minimum standards for license will all be under the control of DLI staff, who have very little knowledge of what a CLS actually does. Also, the most important part of the Board is to screen and adjudicate complaints against licensees. I've seen no suggestion of how this process would work under a program. Would DLI staff and attorneys be expected to build an understanding of CLS practice to be able to efficiently understand these complaints? Would CLS licensees be asked to volunteer for screening and adjudication panels? Because of these issues and many others, I would politely ask that the governors office reconsider this proposal. It is very common in our profession that no one understands what a CLS does, or the value of their work. Please don't let this fact, that we are a silent profession diminish the need for a State License, administered by a board of CLS professionals.

**Please provide your first and last name** Matthew Kalanick

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232794  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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In regards to 'Medical Examiners Board Changes' pages 20-28:|I would not recommend these changes; i.e. moving EMS from the BOME to another DLI Committee.|Although that might potentially increase efficiency, it could degrade the close relationship EMS enjoys with Physicians (specifically EMS Medical Directors and the essential role they play in Montana EMS).| It may also eliminate EMS from being able to take advantage of the Board's 'Provider Assistance Program' (I think that's the name), which provides a structure for healthcare providers who get involved with substance abuse to address the problem and stay in the industry.|Thank you.|Justin Grohs, EMT-Paramedic |Manager, Great Falls Emergency Services |

**Please provide your first and last name**

Justin Grohs

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232795  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name**

Alexandra Davis

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232796  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Policymaker or lawmaker

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Since technology is now advanced we must help the educates with some technical machines to boost their knowledge like touchboards

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**Please provide your first and last name** jay stones

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232797  
Location:

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Current licensed professional in MT

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**Please provide your first and last name** Jennifer Chiu

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Browser: Unknown  
IP Address:  
Unique ID: 1052232798  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Lea Moose

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232799  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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|||TO: Department of Labor & Industry, State of Montana ||FROM: Montana Speech Language Hearing Association ||RE: Comments on Title 37 Reform (Version 3 - Oct. 3, 2022) || \*There are several links in this comment that do not appear to work in this method for submission. I apologize for that!|| My name is Shelby Midboe, President Elect and Public Policy Chair for the Montana Speech-Language Hearing Association. This association includes over 200 members and represents more than 500 licensed speech-language pathologists, audiologists, unlicensed aides, and students obtaining those degrees in Montana. On our association's behalf, I submit these written comments regarding the proposed changes in the October 3, 2022 draft of ""Title 37 Reform"". || ||MSHA asks the Department to amend the current ""Title 37 Reform"" draft as it pertains to Speech-Language Pathologists and Audiologists, as some of the Department's suggested changes are ambiguous or do not properly reflect licensing obligations for this profession. || ||First, some background on licensure for speech-language pathologists and audiologists will be instructive. For speech-language pathologists to become licensed, they must obtain a master's degree. As part of their education, they must have 400 hours of direct clinical practice with clients under the direction of licensed and nationally certified supervisors. They must also pass a nationally recognized Praxis exam. Once those steps have been completed, SLPs apply for Limited Licensure while they complete their 36-week Clinical Fellowship year. This is a year in which additional clinical experience is gained under the mentorship of an experienced SLP. Once the supervising SLP has signed paperwork for completion of the required Clinical Fellowship hours, the student can apply for status as a fully licensed SLP. The path for audiology requires a doctorate in Audiology and a passing score on the Audiology Praxis. Requirements for both are outlined in 24.222.502 of the Administrative Rules of Montana. <https://rules.mt.gov/gateway/ruleno.asp?RN=24%2E222%2E502>. || ||Comment on Title 37 Draft || ||Comment #1 addresses page 163: Referring to Section 86, MCA 37-15-301(3). MSHA is concerned that the language in subparagraph (3) has been removed and requests that it be re-inserted into the statute. The national standard for SLP licensure includes the 36-week Clinical Fellowship year, as is allowed by Montana's limited licensure for SLPs. The limited license is not necessary for Audiologists or for SLP Assistants or Audiology assistants, but since it is the national standard for SLP licensure, it should be left in the statute. In summary, MSHA requests that the language struck in MCA 37-15-301(3), which references limited licenses, be incorporated back into the statute. || ||Comment #2 addresses page 164: Referring to Section 87, MCA 37-15-303(1)(a). ||MSHA is concerned that the comma after ""academic"" has been removed. Removal of the comma after ""academic"" appears to remove the academic requirements required by the original language of MCA 37-15-303(1), which states, ""...the applicant (a) must meet the current academic, supervised clinical practicum, and supervised professional requirements as defined by board rule."" Removal of the comma creates an ""academic supervised clinical practicum,"" instead of properly reflecting separate qualification requirements. As noted above,

there are extensive academic requirements to be licensed as a professional in this field. MSHA requests that the draft language be restored to that in the current MCA 37-15-303(1) and (2) to properly reflect the qualification requirements.

[https://leg.mt.gov/bills/mca/title\\_0370/chapter\\_0150/part\\_0030/section\\_0030/0370-0150-0030-0030.html](https://leg.mt.gov/bills/mca/title_0370/chapter_0150/part_0030/section_0030/0370-0150-0030-0030.html) || ||Comment #3 addresses page 166: referring to Section 87, MCA 37-15-303(3). The addition of (3) appears to negate the consumer and professional protections granted by the Assistant bill passed into law in 2021 (HB 210), and also creates ambiguity in the statute. HB 210 ensured that both audiology assistants and speech-language pathology assistants complete education prior to working with clients. HB 210 protects the consumer from receiving non-skilled therapy and limits insurance payments for non-skilled therapy. Further, HB 210 protects the licensed communication professional from having an unskilled tech perform tasks outside their scope, which places the professional's license in jeopardy. The Title 37 Draft language for 37-15-303 (2)(b) allows for licensure of individuals who have been gaining experience as unlicensed SLPs in any setting prior to January 1, 2024. Once that one-year "grandfathering" period has concluded, all AuD and SLP Assistants will need to obtain licensure through the educational path prescribed by board rule. || ||Therefore, MSHA recommends that page 166, Section 37, MCA 37-15-303(3) be amended to read: "This section may not be construed to prohibit speech language pathologists and audiologists and their assistants from delegating unskilled therapy tasks to unlicensed individuals." || ||MSHA appreciates the Department's consideration of our concerns and suggestions. Please contact me directly at [slp.shelby.midboe@gmail.com](mailto:slp.shelby.midboe@gmail.com), or through our attorney, Robin Turner, at [robin@turnerstrategiespllc.com](mailto:robin@turnerstrategiespllc.com). || ||Sincerely, ||Shelby Midboe ||President-Elect and Public Policy Chair for MSHA

Please provide your first and last name Shelby Midboe

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232800  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Please just leave it the way it is.

**Please provide your first and last name**

Monica Thackeray

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232801  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Judi Rowe

Form Name: Comment Submissions - COPY  
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Browser: Unknown  
IP Address:  
Unique ID: 1052232802  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please consider relieving counselors of the state supervised continuing education requirement. All of them get professional training constantly. If physicians continuing education is not supervised by the state why should counselors be? It makes no sense. As is the state is able to require audits annually if they wish, which is a huge process that takes time and effort to manage on the part of the individual therapist. I have felt like I was being singled out for audits when I had about 4 in a row, year after year. When I contacted Helena I was told 'Oh it's computerized and we're going to be going after everyone at least every other year!'" The person who answered the phone said this gleefully. It was...stunning in its insensitivity to the burden a mental health provider faces simply to maintain a practice, insurance, continuing ed, billing, co-payment tracking, office space, etc.... and then to add on continuing ed state audits for 20 hours annually. Consider also extending the time that surplus credits are good for. It used to be 3 years. It has been reduced to two. An example, I'm currently in a 7 month class on trauma taught by Bessell Van der Kolk, an expert. It will change my professional approach forever, yet the credits are good for 2 years? I am about to retire, but making it easier for young clinicians and graduates goes a long way to solving the problem of not enough mental health providers. The harder it is to deal with licensure the fewer people will want to get licensed, or remain licensed. It needs to be simpler, not harder.

**Please provide your first and last name** Noelle Naiden

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Unique ID: 1052232803  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Leah Smith

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IP Address:  
Unique ID: 1052232804  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Current student- soon to be licensed professional

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Board of Behavioral Health Consolidation|Page 8- Regarding the definitions of mental health professional||Physician Assistant/Associates provide cost effective care to thousands of patients daily across Montana. Not including their position under the list of mental health professionals is a gross oversight and should be corrected. Mental health services are in high demand and eliminating a large avenue of providers of mental health services will only serve to worsen the lack of services. I've already heard anecdotes of PAs having trouble getting reimbursement for mental health services. Please include PAs in this bill so they can continue to provide excellent care to patients across Montana. ||Please include physician assistants in this bill so they can continue to provide

**Please provide your first and last name** Rebecca Barringer

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232805  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Tracy Houser

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232806  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name**

Melissa Humpal Fisher

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232807  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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If the intention of reducing Red Tape is to eliminate unnecessary pessary positions, I am in total support. The money saved needs to be reapplied to improving salaries and efficiency and not to cripple the necessary work of our healthcare system. I really hope that the feedback given is nonpartisan and useful in maintaining our talented workforce. I also expect that healthcare education will become a beneficiary of money saved through any efficiency.

**Please provide your first and last name**

Sheila Ann Shapiro APRN

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232808  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Other: Educator

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I had submitted on 11/2 but didn't note rule notice number on it. Here it is-please disregard my 11/2 comments :|November 8, 2022|Dear Members of the Legislative Reform Committee,|RE: 37-8-102 #4 & 5|37-8-202 #2c |I am writing and asking you to strongly reconsider repealing the Medication Aide programs-Medication Aide I & II. These programs have not been utilized as they were originally intended several years ago. At the time I was a Nursing Home Administrator of the large facility in Havre and I didn't see the value in the program and initially opposed it. It didn't fit with my nursing background. |However, over the years I have seen the facilities that have used them and read the research conducted in several states. This alternative workforce has proved valuable. Now, morethan ever, with this nation's critical, critical nursing shortage, I believe that Montana must not repeal this law but rather to reinforce the need for it. |I now work for Great Falls College, Life Long Learning Program and am the Clinical Coordinator of the Healthcare programs. We offer CNA, Paid Feeding Assistant, Medication Aide 1 & II, and HHA certifications. We work very closely with Vocational Rehab, Employment Services and other workforce development programs to assist individuals in training and work. In the 1.5 years that we have been offering these programs we have trained nearly 200 CNAs, a dozen HHAs, and are in process of offering Medication Aide II classes to Great Falls' largest health care employer. Their need is simple and straight-forward-they do NOT have enough nurses to take care of the residents. They reached out to us to help them and we are now training 7 Medication Aides. |We have also trained Medication Aides for one of the Assisted Living facilities here in town-they are awaiting testing. |I recently spoke to a CNA who left another assisted living facility because she was told she had to pass medications. She did so without any formal training and left that position because she felt so ill-prepared and unsafe. The Medication Aide I program for Assisted Living was initially passed in the hope that Assisted Living Facilities would use trained medication Aides to improve quality of care and safety for the residents. |Having standardized, structured programs with professional licensure for Medication Aide 1 & 2 accomplishes many goals:|1. Raises the standard of care and safety. The curriculum for these programs focuses on medication safety, narcotic safety, adverse drug reactions, and knowledge about the drug classifications. |2. Makes the individual professionally responsible and accountable and they must receive annual continuing education credits to maintain licensure.|3. Offers a career ladder to a valuable workforce. Some of the CNAs at the facility where are offering the class are taking the program because they recognize they need a change from the physical demands of the CNA work-yet they want to remain with their residents. |Removing these programs solves the wrong problem. Instead, we should continue to be creative and work to get more people into the workforce in diversified and well-trained fields. |Sincerely, |Lori Henderson, BSN, RN, NHA||

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**Please provide your first and last name**    Lori Henderson

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052232809  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In regard to the drafts presented in the Red Tape Reduction Initiative. I agree with the reduction in the number of Board of Dentistry members in Board Consistency --Version 2 related to MCA 2-15-1732 to improve efficiency and reduce burden for licensees. However, I offer a proposed change in the draft to add one additional dental hygienist member and reduce the number of dentists to three. ||The reasoning behind this advisement is that the number of licensed dental hygienists (1,002) currently outnumber the dentists (892) and denturists (20+). Dental hygiene providers are educated to provide preventive services, the other provider types provide restorative and/or surgical services after the impact of inadequate prevention. |Dental hygienists should be judged and regulated by their peers in prevention. Equal representation to avoid conflicts of interest and modernize licensing will promote the public's oral health.

**Please provide your first and last name** NanCee Neer-Labbe

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232810  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have been an RS for 10 years. I am in favor of moving the licensure from a Board to a DLI program. However, it appears in the draft that the Sanitarian in Training status has been repealed (see 37-40-101 (6) ). If this is not the case, please disregard. If this is the case, I am not in favor of repealing the SIT status. Many counties have used the SIT status to hire individuals who have not completed the required microbiology course to receive a full RS license. The individual must work under an RS and report training to the Board (and now, assumingly, DLI). This is a setup similar to an plumbers apprentice or other apprenticeship. This is a valuable option for many counties as it is difficult to find individuals with the unique qualifications for an RS license, and there are a very limited number of licensees in Montana. I would strongly urge the Department to reinstate the SIT option.

**Please provide your first and last name**

Stephanie Ler

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232811  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft Name: Version 2 - 10/3/22 - Board Consistency Reform Draft||1) Page or Section: Page 6. NEW SECTION Section 3.

Appointment-Qualifications-Terms||2) The governor shall have the authority to remove|members of the board with or without cause.||A. Specific Comments: MOGA Opposes the proposed NEW authority for the Governor to remove Board Members without cause.| |B. Rationale: Appointments to Boards are staggered to ensure corporate memory and consistency in performing the Board functions. This provision would allow a Governor to release ALL Board members at the change of an Administration. This leads to elevating the politicization of Boards and diminishes the corporate knowledge that is carried over as administrations change.

||C. Recommendation: Delete this section.||2) Page or Section: Page 7. NEW SECTION Section 3. Appointment-Qualifications-Terms||4) Each public member of the board shall be a resident|of this state and at least 18 years of age. A public|member shall not be, nor shall ever have been, a licensee|of the board on which the public member is appointed to|serve, the spouse, parent, or child of a current or former||licensee of the board, or a person who currently or within|the 3 years prior to appointment had any material financial|interest in the provision of professional services or|engaged in any activity related to the practice of the|profession regulated by the board on which the public|member is appointed to serve, except as a consumer.||A. Specific Comments: MOGA opposes the portions of this NEW Section that removes specific language passed by the Montana Legislature in SB 275 least session, linking the public member to an ancillary business related to the Outfitting industry.||B. Rationale: Under prior administrations, the appointed public members were selected from groups that were openly hostile and anti-outfitting. This was unproductive. By seeking a public member that had a business outside of outfitting but otherwise part of the outdoor recreation industry dependent in some manner on outfitted regulation, we have a representative working to ensure a well-regulated and effective licensing process. ||C. Recommendation:

Amend this section to allow for a person with a related business interest to serve as a Board Member.||3. Page or Section: Page 7. NEW SECTION Section 3. Appointment-Qualifications-Terms||5) Each board member shall maintain eligibility to|serve on the board by avoiding conflicts of interests or|relationships that would interfere with the board mission|of public protection. No member of the board may serve as|an officer or hold any leadership position in a state or|national professional association representing the industry|related to the profession regulated by the board for the|term of the board member's appointment. A leadership|position includes but is not limited to a voting member of|an executive board, or service on an ethics committee, membership committee, examination committee, or other similar positions of the association or other similar organization.||A. Specific Comments: MOGA Opposes the portion of this NEW section that prevents a seated Board member of a related trade Association from serving on the Board of Outfitters. ||B. Rationale: This provision will materially affect the quality and quantity of those willing and qualified to serve on the Board of Outfitters. There are only 700 licensed outfitters in Montana and most belong to one or both statewide trade

associations (MOGA or FOAM). We are not sure what unique circumstance has led to this recommendation, but we expect that it was an exception not the rule. Those engaged in Trade Association service as seated Board members are often THE most active and informed members of the licensed community. To arbitrarily exclude them based on the assumption of conflict is to assume the worst in people and ignore the demonstrated history of selfless and dedicated service they bring forward and will dilute the pool of some of the best candidates. This is an unnecessary statutory change. The Governor has the latitude to appoint any qualified person they wish, and the Senate must confirm the appointment. These two levels are sufficient to address the perception that somehow serving on a Trade Association Board is a conflict. ||C. Recommendation: Amend this NEW section in a manner that allows a seated Trade Association member to serve on the Board of Outfitters. If you insist, then limit the exclusion to Trade Association members who are in the executive level (e.g., President, VP, CEO) and not to the general Board member.||4. Page or Section: Page 48. Section 34. Section 2-15-1773, MCA is amended to read: 2-15-1773. Board of Outfitters. |(a) one outfitter licensed for both hunting and fishing,|representing a public land hunting and fishing outfitter knowledgeable in government permitting and preferably with a packing endorsement;|(e) one public member of the general public who is a|Montana-based business owner who engages in nonoutfitted|business that is reliant on the local outdoor recreation|industry. ||A. Specific Comments: |(a) MOGA opposes the redaction referencing the preference for a Packing Endorsement.|(e) MOGA Opposes the redaction of the language related to the Public Member||B. Rationale: |(a) The packing endorsement is assigned to a qualifying Outfitter when a specific exam has been taken and successfully passed. Packing livestock is a very specific skill set and knowledge about that aspect of the industry is essential when evaluating regulations or guidelines affecting this segment of the industry. Under SB 275, passed last legislative session by a bi-partisan majority, the packing endorsement preference was attached to the Outfitter seat that would generally be assigned to the public land fishing and hunting outfitter. We strongly believe this preference should remain as a form of guidance to inform future appointments and ensure the full range of tested and regulated skills/disciplines are represented on the Board of Outfitters.|(b) We object to the redefining the public member qualification. We have, under prior administrations, endured appointments of public members who have no interest in a well-regulated and licensed industry. Rather, they were there to provide opposition. By having a public member with ""skin in the game"" we will see the value of this seat emerge as we actively work to ensure the health safety and welfare of the outfitted client through practical and sufficient licensing and regulation requirements. ||C. Recommendation:|Leave as is and do not remove the preference for packing endorsement and continue to have public members who actually have skin in the game. ||

Please provide your first and last name Mac Minard

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232812  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

MCA 37-67-101 and ARM 24-183-407 teaching of advanced engineering subjects. The language "When teaching advanced engineering subjects in Montana, either the class instructor or the person in responsible charge of the board-approved curriculum shall be a Montana licensed professional engineer and be in responsible charge of class instruction of engineering classes at the junior level and above" is unenforceable. Other professions require that persons teaching to that profession be licensed, period. Engineering programs in Montana have non engineers teaching and not under any meaningful supervision of an engineer. The same can be said if the curriculum. The definition of "responsible charge" also seems to have been diminished by repeal of related sections on required expertise.

**Please provide your first and last name** matt egloff

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232813  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Robert Picard

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232814  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers do not get enough credit for their capabilities. They deserve to be left alone on their scope of practice and not overseen in a different way. They are competent and capable of everything currently set in their scope of practice as they spend time and money to get an education and participate in competency clinical rotations. This is the same as any other health professional of similar status. Leave athletic trainers certifications, boards, oversight, and scope of practice alone legally.

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**Please provide your first and last name** Caylee Hajde

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232815  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Regarding proposed AT's licensing changes:|Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program

**Please provide your first and last name** Aron Hajde

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232816  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Regarding proposed AT's licensing changes:|Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program

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**Please provide your first and last name** Aron Hajde

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232817  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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With regards to your changing of AT's professionals and your governance:|Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.|I am opposed to changes that affect AT's that you are considering in your legislation.|

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**Please provide your first and last name** Aron Hajde

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232818  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.

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**Please provide your first and last name** Carlea Wallace

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232819  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** McKenzi Adams

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232820  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am strongly against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. As a private practice practitioner athletic trainer (AT), I am often confused with personal trainers in local gyms. ATs are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Having an appropriate board in place gives me and other ATs the proper recognition and distinction from personal trainers and helps to alleviate confusion to the public we provide services to.

**Please provide your first and last name** Jaime Huestis

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232821  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** Chalynne Wisniewski

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232822  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Chalyne Hajde

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232823  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide your first and last name** Chalynne Wisniewski

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232824  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** Bailey Schwab

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232825  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Pahl Schwab

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232826  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.||

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**Please provide your first and last name** Daijha Wilkes

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232827  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|Dear Governor Gianforte - I am one of your loyal supporters! However, on the licensure consolidation it just does not make sense. The board members do not cost the state of Montana and need to be regulated by people who understand the complexities of being an Athletic Trainer. Thank you for the review of this initiative. |Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Nicole Blubaugh

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232828  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Repeal of Medication Aides Ver 1 10/3/2022 page 3||The long term care industry has absolutely been crippled by Covid, the vaccine mandate, and medicaid rates well below what the cost of care is. Our facility has been unable to hire RNs or LPNs for positions that have been open in excess of two years going on three. Currently the DON and RN Administrator are covering floor shifts routinely. Our current only hope of filling these positions is by utilizing one of our CNAs who has completed all required steps and is just waiting for her medication aide license to go through. Across the board, action like this will be very detrimental to long term care facilities who are already struggling.

**Please provide your first and last name** Denise Clark

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232829  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am strongly against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.||Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.||Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Kerianne Fuller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232830  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Troy Bowman

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232831  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.||

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**Please provide your first and last name** Courtney Seaboldt

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232832  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name**

TediJo Pederson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232833  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

---

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

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**Please provide your first and last name** Erik Spencer

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232834  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Casey Meidinger

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232835  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Current Member of

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Tiffany Heeren

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232836  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** Justin Meidinger

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232837  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Current Member of NATA & Licensed Athletic Trainer in WY

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Tiffany Heeren

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232838  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please review plumbing licenses and give the opportunity for licensed Journeyman to challenge the Master Plumber exam. Or consider provisional licenses, like a license to install and repair hot water tanks for instance, similar to neighboring states. Currently, a licensed Journeyman Plumber is not legally protected or allowed to do any maintenance or repairs on very simple plumbing problems, without working for a Master, another shop. [This creates a hardship on those in desperate need of qualified plumbers to repair things in their homes. See the letter to the governor I sent to the red tape relief department.

**Please provide your first and last name** Austin Domnitz

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232839  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Robert Botkin

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232840  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Rebecca Frye

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232841  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hello, a year ago I drafted a letter to the Governor's Red Tape Relief program department and also raised the same concerns from my letter to DLI, the Board of Plumbers, the Department of Licensing, and the Montana Contractors Association to raise awareness of the need to reform Montana's current rules and regulations concerning plumbing licenses. I didn't see the concerns I raised in the draft of this proposed bill. |Montana has a severe shortage of qualified skilled trades, especially plumbers. The cost of plumbing is completely unaffordable and the wait times for repairs to the average Montanans plumbing needs is unacceptable. |The simplest solution would be to make an allowance in this new bill to allow licensed Journeyman plumbers the right to challenge the states Master plumbing exam, or to reduce the number of years required by journeyman plumbers to "Master-out" (to qualify to treat as a Master Plumber) from the current four years to two years like in most States. This would allow more plumbing shops to start in small towns, and to allow local plumbers to serve their own communities better. |Plumbers, who are not business owners, have no legal protections to repair any plumbing in residential homes or in businesses. Im a journeyman Plumber, and if I repair my neighbor's hot water tank, I will be breaking Montana law, because I'm this State only a Master Plumber may pull a permit to connect or disconnect to a plumbing system. So the available journeyman plumbers cannot repair needs in their community-legally- without working for a Master Plumber's shop, and most often the big shops are more interested in new construction in Bozeman or Big sky, but not at all interested in serving local communities. I know of many, average earning, small town, Montanans who have leaking or unsanitary systems, clogged or in real need of servicing, who absolutely can not hire a plumber without exorbitant cost (which they cannot afford) or month long wait times. |Please consider adding to this draft wording that allows Journey plumbers to take the Master exam after 2 years, or to challenge the test immediately. |Thank you, and please forgive any typos from my phone.

**Please provide your first and last name** Austin Domnitz

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232842  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name**

Nicholas Verlanic

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232843  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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For <https://boards.bsd.dli.mt.gov/Title-37-Reform---Ver.-4.pdf> :I don't see any new or helpful ways to have easier/readily available online bridge programs for LPN to RN. I really do believe this will assist current and future nurses state wide! Programs such as Excelsior are excellent options for our rural nursing communities!

**Please provide your first and last name**

Kender Beeler

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232844  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Med board changes- I have been reading the changes you are proposing and it looks like the dept of labor would have nothing to do with us really. They would just plug and play what the national registry says. The national registry DOES NOT support what we do here in Montana! Where is the Medical direction oversight in the new rule or ""take over""? We already have issues since Ken Threet has retired and there is no one to ask questions, or over see whats going on. People are doing half ass EMT courses and not following rules. Why cant we just keep things under the board of medical examiners. I think there are alot of things the Dept of Labor has no clue about running ECPs. I do not feel this change would be a good one for EMS.

**Please provide your first and last name** John Carlbom

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232845  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Mary Knott

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232846  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide your first and last name** Bella Andersen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232847  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I support the draft language as described in sections 37-67-301 through 37-67-326. however, I request and suggest that section 37-67-312 also be amended to strike the last sentence 'An applicant whose initial licensure in another state does not meet the experience requirements of 37-67-323 must be required to demonstrate 2 years of post licensure experience for each year of prelicensure deficiency' Striking this last punitive requirement would be a positive step to increased mobility for comity applicants that meet all other requirements of the board. I request department review to please consider this important amendment. In my experience, this slight change would improve licensure mobility and not cause harm to the important mission of protecting safety health and welfare of professional engineering licensure.

**Please provide your first and last name** Tom Pankratz

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232848  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name**

Benjamin Miller Castellanos

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232849  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. We are a vital part of health care in the state of Montana. From the help with addiction, chronic health issues and mental health. Massage therapy is health care.

**Please provide your first and last name**

Julie Johnson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232850  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Title 37 Reform, Section 216|Please remove 37-33-402 from this section.||Massage therapy is a healthcare profession and this is the only place in statute that acknowledges that. Massage therapists bill insurance and are reimbursed via worker's compensation. Massage therapists also work in various medical settings. The repeal of 37-33-402 could jeopardize that. ||I apologize for missing this one in our previous correspondence, It slipped through our vetting process. In actuality, this fix is our number 1 priority!!!!|We would appreciate you fixing this one!

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**Please provide your first and last name** Deborah Kimmet

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232851  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Monicka Granger

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232852  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Jennifer Peace

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232853  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. The education you receive as a Licensed Massage Therapist is very similar to other health-related fields. We take classes like kinesiology, pathology, anatomy, and physiology and other states across the country recognize Massage therapists as a health-related field. We are required to take a national exam like other health-related professions. Why is this important? If we are no longer considered healthcare professionals, it opens us up to be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession. The state can combine our board with the cosmetology board. Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved. The state can refuse to allow massage therapy reimbursement for workers comp. Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it. It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

**Please provide your first and last name** Aleesa Watson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232854  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy and bodywork is a healthcare profession and deserves that recognition in state law. Alternative and integrative medicine should be included in necessary healthcare practices, I have an undergraduate degree and over 1500 hours of professional education as a bodywork therapist and have seen several clients become less dependent on social heal and more functional in their work and hime life after bodywork sessions. Touch is key to mental health and massage therapy is necessary to supporting a healthy population

**Please provide your first and last name** Lisa Wortman

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232855  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law. ||I understand that many think of massage as a way to illegal prostitution. I AM A HEALTHCARE PROFESSIONAL. I have many modalities that I use in my practice. |

**Please provide your first and last name**

Rainy Kemp

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232856  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Suzette Nynas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232857  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Thomas Ebel

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232858  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Licensed professionals give credit and validity to Montana by setting a high standard and show of education! | Thank you !

**Please provide your first and last name**

Michelle McClain

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232859  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law. ||Please explain why this is happening; it makes NO sense. Massage therapist are trained, educated professionals providing a needed service.

**Please provide your first and last name** r mochi

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232860  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""|

**Please provide your first and last name**

Kayla Bittle Bittle

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232861  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||

**Please provide your first and last name** Ellen Carey

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232862  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||Why is this important? |If we are no longer considered a healthcare profession:|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession|The state can combine our board with the cosmetology board|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers compensation.|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|State and County workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed. |It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.|We as Montana LMTs work very hard to provide therapeutic care to people in our state every day. Massage Therapists train and are qualified to keep Montanans functioning on the job, recreating, recovering from injury and off of prescription pain meds. Massage Therapy is important complementary medical care and needs to be recognized as such. |

**Please provide your first and last name** Jennifer Vanderburg

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232863  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. By no longer recognizing that massage therapy is part of the healthcare profession, many people would lose access to services they need for restoring their health and wellness due to losing the recognition of insurance agencies and then no longer approving the services. This will also lead to massage therapists leaving the state and moving to one where their profession is recognized as part of the healthcare profession. This in turn will lead to a decrease in state revenue from healthcare businesses taxes. Massage therapy has been part of traditional and modern healing systems for thousands of years. Repealing that recognition will only hurt people and create even more paperwork as they try more things that are covered by insurance but don't work for them to alleviate a problem that massage therapy could have gotten rid of without the stress, mental and possibly physical damage, and red tape and paperwork of ineffective treatments. Massage therapy has also been proven to reduce the need for pain medicine. This in turn helps decrease the risk of patients becoming addicted to pain medicines. Once again, I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Jody Cope

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232864  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. |Massage therapy is not adult entertainment. Massage therapy helps hundred of thousands of Montanans recover from injuries, decrease stress, live healthier lives, plus many more benefits.

**Please provide your first and last name**

Elaine Doll

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232865  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Future LMT -student current

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove tel:37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of tel:37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||Why is this important?|If we are no longer considered a healthcare profession,|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession|The state can combine our board with the cosmetology board|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers comp|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

**Please provide your first and last name** kandice johnson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232866  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: I am an educator of massage therapy in Montana. I own and operate the Massage Training Institute headquartered in Kalispell.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This is an inquiry for more information, as I was just made aware of proposed licensing governance proposals. I would like to know what if any are the intentions in relationship to "Massage Therapy" and the Montana Board of Massage Therapists. Without knowing any details at this point I want to assure massage therapy in Montana will remain as a bonifide "Heathcare Profession" and not lowered to a lesser category such as the "Cosmetoloy Board". Massage therapy could take a significant financial hit should we be relegated to a position where we would not be recognized as healthcare professionals. Referrals from physicians, chiropractors, pts and others are extremely important to the massage therapy. A significant percentage of massage therapists in Montana could be negatively affected. This would also be a loss to the heathcare community as clinical, medical massage therapists fill a space that no one else has filled. Our discipline focuses primarily on one modality that being soft tissue manipulation. We are an important adjunct to PT's, Chiropractors & others. Thank you for considering these thoughts and I look forward to learning more. I am not against positive change for the sake of a more effecient and cost effective professional governance. I only want to see it done in a way that carefully considers the position of the massage therapist! Thank you, Michael Eayrs  
Massage Training Institute

**Please provide your first and last name** Michael Eayrs

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232867  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||I have helped many individuals in my career with post op shoulder and back surgeries, car accident injuries, prenatal care, as well as pain relief from chronic pain and repetitive motion strain all while working within my scope of practice and knowledge of the human body. I value the licensing process, requirements, and standards that I am hed to as a massage therapist where I have been trained as a medica professional to collaborate with doctors, chiropractors, physical therapy, and the like, to be a part of a wellness team for my clients. It has also allowed me to submit paperwork for legal purposes as well.

**Please provide your first and last name** Miya Tymofichuk

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232868  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.||Recently, the Veterans Administration has begun to cover massage therapy services under the Whole Health Program. The VA website defines Massage Therapy this way: ""Clinical massage therapy is the manipulation of the soft tissues of the human body for therapeutic purposes. Based in ancient traditions, massage therapy is a professional health care discipline in the United States.""  
([https://www.va.gov/WHOLEHEALTH/professional-resources/Massage\\_Therapy.asp](https://www.va.gov/WHOLEHEALTH/professional-resources/Massage_Therapy.asp))||Massage therapy now, more than ever, needs to be recognized as a legitimate healthcare profession. It would be catastrophic to deny (specifically) this important community of chronic pain sufferers of their right to non-pharmaceutical pain management.||My clinic alone provides acute and chronic pain management to near 150 local veterans through this program.||

**Please provide your first and last name** Rachel Smead

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232869  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Licensed Athletic Trainer in WY

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have been a practicing athletic trainer for 2 years now and have been around the profession for over 10 years now. I understand the importance of having an established licensing board and the security it provides for athletic trainers and the patients that they treat. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Zachary Wisniewski

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232870  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. My business is completely health care focused. I submit to insurance companies and workmans comp. If this is changed you make the profession appear less than it is. There is a great need for extensive soft tissue work and massage therapy is about helping tissue to recover through releasing scar tissue that binds up nerves and causes great pain. There are so many health benefits that therapeutic massage does. This is just one example. Please remove this!! Thank you

**Please provide your first and last name** Joyce Munday

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232871  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law. Without recognition you are putting the public at risk. The profession of massage therapy is not one amenable to deregulation.

**Please provide your first and last name** Carrie Jones

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232872  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

These questions are in relation to the Draft entitled Clinical Laboratory Science Practitioner Board to Program||""37-34-403.Standards for licensure. (page 6): 1.) What qualifications will be required of the department to determine whether candidates have fulfilled their requirements to apply for licensure? |(2) The board shall issue.... so is it a board or a department that is being discussed? This sentence clearly says board, not department. ||Page 7: Section 4|""37-34-305. Licensure application procedures. Again, what are the qualifications of those in the department to make the determination that the application is complete and accurate? ||Page 8: Section 5 |""37-34-307.  
Violation--penalties--injunction-- |(3) When charging a person in a complaint for injunction or in an affidavit, information, or indictment with a violation of law by practicing clinical laboratory science without a license, it is sufficient to charge that the person did, on a certain day and in a certain county, engage in the practice of clinical laboratory science while not having a license to do so, without specifying particular facts concerning the violation."" My question, what truly does this mean? Is this really what the complaints are for? To charge someone for practicing laboratory science without a license? This paragraph needs much more clarification. |||Thank you for considering these questions.

**Please provide your first and last name** Anna Adams

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232873  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.||Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.||Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Robert Kirchner

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232874  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I have worked hard over the last 19 years of my massage career to become recognized by other healthcare providers. I have the proper education to call myself a licensed massage therapist. I not only have a thriving business, I help clients daily with their acute and chronic pain. They don't come to me for relaxation, they come to me for specific reasons and to help manage their pain. I have Doctors, Chiropractors, Physical Therapists, Orthopedic surgeons refer clients to me, they are all part of the healthcare professions, and obviously value my massage services to be able to help their clients in a healthcare setting. Not only would this draft jeopardize all that I personally have worked for, it would jeopardize the healthcare professions from being able to refer to our practices. It would make sex trafficking and adult entertainment more assessable in this profession and less hoops for them to jump through. ALL licensed massage therapist have worked hard to make our profession what it is today and trying to create awareness against the sex trafficking and adult entertainment from being in our profession. Please consider the reasons above and remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. Thank you for your time and consideration. Stacy Baird

**Please provide your first and last name** Stacy Baird

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232875  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because massage therapy IS a healthcare profession, is and has been licensed in this state and others, is categorized in Insurance coding under health care insurance and deserves that recognition in state law.||Why is this important?||If we are no longer considered a healthcare profession the following may occur:|1 - Medical professionals regularly refer to massage therapy - legislation can affect peoples attitudes and the insurance companies may no longer pay for this incredibly healing modality (think lymphatic system & oxygenating blood flow) because of the potential liability involved.|2 - The state can refuse to allow massage therapy reimbursement for workers comp|3 - Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|4 - It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied. |5 - It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession.||6 - We should not be combined nor our board with the cosmetology / nail board. They are not taught together - nor should they be licenced together. ||There are SO MANY facts to this industry - It should stay on the medical field because that is the whole study. We are taught and licenced more extensively than an LPN and have different knowledge than many nurses/ chiropractors and even some doctors. Where else do you licence the study of muscles (a major part of your body!)|8. The massage therapy industry does so much more for the madical community that is not serviced any other way. It' is extremely important to keep regulatory information as a medical licence. |9. A medical licence to touch does not fit into any other category than medicine.

**Please provide your first and last name** Lauree Sundahl

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232876  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|This would totally change all that we have worked so hard to achieve. We help so many people to be able to get through each day. Thank you!

**Please provide your first and last name**

Julie MacDonald

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232877  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|My entire livelihood as a small business owner in Ennis, MT depends on my Licensed Massage Therapist status as a healthcare profession. I work closely with our local hospital to provide Orthopedic Massage Therapy on a referral basis and this would prevent insurance billing, and also prevent referrals and a close working relationship with the hospital.

**Please provide your first and last name** Emily Osborn

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232878  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. |This would be detrimental to the profession, to the professionals who's livelihood depend on it and to the people who benefit from this medical care.

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**Please provide your first and last name** Hope Beaudry

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232879  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Kristi Graham

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232880  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Jessica Hunter

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232881  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Allisa Thanepohn

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232882  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Kristi Ernest

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232883  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Bailey Salsbury

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232884  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from title 37 reform section 216 that repeals the statute || oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law

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**Please provide your first and last name** Keesha Timmer

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232885  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please do not change anything that will make it more difficult for us to access safe, natural, effective treatments like massage therapy. It helps many people that they may use insurance for this service. It is also an industry that is difficult to make a living in. Massage therapists do not need more obstacles in their way. Leave this alone. It's working well. Do not mess it up. Only corporations and governments stand to gain from changing language and policy on this. But Montana is about the people. Not corporation. Not government.

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**Please provide your first and last name** Emily Davis

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232886  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||| oppose repeal of 37-33-402 because|||massage therapy is a healthcare profession and deserves that recognition in state law.||| help many clients out of pain everyday, which improves their mental and physical health allowing them to be more successful in work and family life.

**Please provide your first and last name** Ashley Nelson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232887  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|Why are we degrading and going backwards again? If massage has been recommended by chiropractors, sports therapist, mental health professionals and do many more, how can it be not a part of healthcare and wellness? Just look at the science and physiological/mental changes that occurs during and after massage! Thank you!

**Please provide your first and last name** Tatyana Mironov

Form Name:  
Submission Time:  
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Comment Submissions - COPY  
December 30, 2022 5:02 pm  
Unknown

1052232888

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

||Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||Massage Therapy a healthcare profession and deserves that recognition in state law.||I have been a massage therapist since 1986. I was originally trained in Toronto Ontario ,Canada and after graduation worked in BC and was covered under BC medical to treat patients for many years. We had mandatory continuing education as we do here in MT. I have continued to treat patients working both in a chiropractic setting and working in a home office. Massage therapy is a very valuable tool for healing as it is specific and addresses the myofascial restrictions that often result after injury. The act of massage resets the golgi tendon organ allowing a increased state of relaxation and/ or increased length of tendon and muscle. Trigger points also address restrictions . More mobility is achieved with passive movement than active movement . Please take massage therapy seriously . It is a valuable tool in healing and many therapists have invested much time, expense and energy into becoming skilled therapists. It is very, very insulting to have us grouped in another category akin to prostitution. When I became a massage therapist in 1986 we were just achieving a name for ourselves as medical providers , based on the effectiveness of massage therapy as a healing modality. This is nearly 40 years ago! Why is this being questioned and returned to the dark ages? |Sincerely,|Patricia Macmillan BA RMT /LMT |||Why is this important? \*\*\*EDITED TO ADD #6||If we are no longer considered a healthcare profession,||1. It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession||2. The state can combine our board with the cosmetology board||3. Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.||4. The state can refuse to allow massage therapy reimbursement for workers comp||5. Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.||6. State workers may lose the bility to be reimbursed by their flexible spending/health care benefits if massage is prescribed. (Thanks Wendy for this!)||7. It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

**Please provide your first and last name** Patricia Macmillan

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232889  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|There is plenty of research that shows the beneficial effects of therapeutic massage. It returns soft tissue to normal tension, thereby reducing pain and increasing range of motion. Massage reduces stress which in turn lowers blood sugar and with the epidemic of obesity and diabetes in this country, we need all the non-invasive approaches that we can get.

**Please provide your first and last name**

Penny Capps

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232890  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Brianna Mittleider

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232891  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 reform section 216 that repeals the statute . I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Massage therapy has become an integral part of healthcare for many people suffering from chronic health issues and/or sports related injuries. OR even pregnancy related problems.

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**Please provide your first and last name** Deidre Frame

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232892  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I am almost 73 years old now. My most important question is who is the source behind this move to remove massage therapy as a Healthcare profession? In the past it used to be Physical therapy field. I do not know who it might be now,.. There are enough clients out there for all worlds of Physical therapists and Massage therapists or whomever as we do different things with some overlap. It is not either or....it is AND!!! We can work in the same box effectively without destroying one another's occupations in the process. When I started as a massage therapist I was older and Massage therapy had come a long way breaking old stereotypes becoming the field that it is in the Healthcare field. If nothing else we need to enforce it stronger in the healthcare field as a profession instead of illegitimize it backwards the way Chiropractic or osteopathy used to be. I have been a massage therapist since 1991 using the various massage therapy techniques to assist people in improving their health and well being through circulation stimulation, lymph drainage, reflexology, somatic techniques, relaxation, body sculpting which improves health and well being, In 2005 I added Licensed Clinical Professional Counselor to my Profession as my clientele had many trauma survivors that the massage therapy and Craniosacral therapy was helping splendidly. But i felt I could do more with added counseling too. The massage therapy license is a foundation for so many additional healthcare needs. One of the biggest ones currently is health related Medical spas where specially trained massage therapists can offer assistance to lymph drainage after a procedure thus freeing up nurses time after they are discharged. So proof can be said that by removing Massage therapy from the healthcare as a profession can have devastating consequences for the population who need these services. That seeing to it that Medicare covers the services of a massage therapist for the elderly would be a better use of the time as it would aid in better health and well being, improving blood circulation, lymph flow, helping people be grounded, releasing stress thus reducing stress related diseases. A duhhhh.... Folks elevator to the top here. MASSAGE THERAPY IS A Proven HEALTH BENEFICIAL TREATMENT. NOT anecdotal!! THUS A PROFESSIONAL WHO PERFORMS IT IS A HEALTHCARE PROFESSIONAL AND SHOULD THEREFORE BE RECOGNIZED AS SUCH!! Sharon R. McLean, MSW, LCPC, LMT

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**Please provide your first and last name** Sharon R McLean

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232893  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|This affects massage therapists and the general public since the state can refuse to allow massage therapy reimbursement for workers comp, limits medical professionals referrals to massage therapists due to potential liability, state workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed, and it can affect massage therapists in chiropractor offices, hospitals, medical clinics, and hospice.

**Please provide your first and last name** Carol Murray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232894  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Gabriel Nordquist-Palmer

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232895  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To Whom it may concern, ||I am writing to defend the status of massage therapy as a healthcare profession and request that 37-33-402 NOT be repealed. ||The National Institutes of Health (NIH) and the US Department of Health and Human Services recognize massage therapy as a complementary and integrative health profession with plenty of published scientific evidence-based literature to back this claim (<https://www.nccih.nih.gov/health/providers/digest/massage-therapy-for-health>). Repealing this statute will have negative implications for professional massage therapists, including:|1. Relegating massage therapy to be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession. I've been in this profession for 25 years and witnessed its reputation transformation. This is a leap backward.|2. Medical referrals will likely plummet due to liability. |3. Decreased or non-existent insurance reimbursement. |4. Increased criminal activity. Make no mistake, massage therapy across the country is plagued by human trafficking. A repeal of this statute may increase and embolden this criminal activity.||I implore you to revisit this issue and uphold the health, safety, and welfare of Montanans and the integrity of Montana's licensed massage therapists by continuing to consider our profession a healthcare profession.||Warm regards, ||Julie Wray, LMT ||MT license # 14000||Shelby, Montana|

**Please provide your first and last name** Julie Wray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232896  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37|Reform Section 216 that repeals the statute.|| oppose repeal of 37-33-402 because massage therapy is a healthcare profession|and deserves that recognition in state law.

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**Please provide your first and last name** April Eling

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232897  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Peggy Ray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232898  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide your first and last name** Kelly McKitrick

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232899  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose the repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Adrienne Kuhr

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232900  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Montana Code Annotated 2021|TITLE 37. PROFESSIONS AND OCCUPATIONS|CHAPTER 33. MASSAGE THERAPY|Part 4. General Provisions|Purpose||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.|| (2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.|Title 37 Reform: section 216 ; to repeal MAC 37-33-402|PLEASE DO NOT repeal the law and regulations that define Massage Therapy as a separate, beneficial healthcare allied profession! While I laud the impulse to cut tons of red tape and make Montana one of the few FREE states left in America, this repeal would throw the baby out with the bathwater. The practice of massage is a unique and necessary part of recovery from injury, surgery, and illness. Clinical massage therapy heals in a way that other methods cannot. It is a necessary adjunct to surgery, chiropractic treatment, physical therapy, and recovery from motor vehicle accident/injury. Massage IS an allied health profession with its own specialties and branches of knowledge. Because of the personal, individualized nature of massage treatment the profession needs its own set of standards and regulators. The field is changing and growing all the time. The high degree of knowledge , professionalism and ethics needed today require specific training and oversight by a body of peers who understand and care deeply for the quality of care delivered by every professional involved.|Repealing the statute that acknowledges the uniqueness and value of professional, high quality treatment or that invalidates the health benefits of massage treatment would lead to worse healthcare outcomes for those citizens having surgery, recovering from workplace accidents, recovering from auto accidents; those learning to live with chronic illnesses and congenital diseases. Please retain MAC 37-33-402. Thank You, Brenda Windom LMT, CLT-LANA

**Please provide your first and last name** Brenda Windom

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232901  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. |

**Please provide your first and last name** Kaycee Phillips

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232902  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a member of the Massage Therapy Licensing Board for Montana, Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. ||I oppose the repeal of 37-33-402 because|massage therapy is a healthcare profession and it deserves that recognition in state law. ||Why is this important that you keep massage therapy as a healthcare profession? ||If we are no longer considered a healthcare profession, it opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession. This will also cause a major increase in IMB's (illicit massage business) to move into Montana, a problem we are already facing! ||Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved. ||The state can refuse to allow massage therapy reimbursement for workers compensation. Massage therapy is an important part of rehabilitation for workers compensation cases. ||Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it. ||State workers as well others may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed. ||It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied. ||IT WILL AFFECT ALL LICENSED MASSAGE THERAPISTS IN THE STATE OF MONTANA NEGATIVELY! ||Massage therapy has and always will be a part of the healthcare industry. You can find massage therapy listed in the National Institute of Health under Complementary & Alternative Medicine. So that defines it healthcare.

**Please provide your first and last name** Jennifer Roth

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052232903  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|This affects massage therapists and the general public since the state can refuse to allow massage therapy reimbursement for workers comp, limits medical professionals referrals to massage therapists due to potential liability, state workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed, and it can affect massage therapists in chiropractor offices, hospitals, medical clinics, and hospice.

**Please provide your first and last name** Carol Murray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232904  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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Please remove 33-37-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 33-37-402 because massage therapy is a healthcare profession that must have recognition as such in state law. As someone who was injured in a car crash, I needed massage therapy, along with other medical attention to heal whiplash. If massage therapy is not recognized as a healthcare profession, many people may lose access to necessary treatment for injuries because insurance will deny claims. This is unacceptable. Please do what is best for the public and maintain massage therapy as a healthcare profession.

**Please provide your first and last name** Mariah Rees

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232905  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: I am in multiple categories above: I am an MD, currently licensed in MT; I am a Medical Director of three Ambulance Services and am the direct supervisor of several EMTs, also on the Board of MEMSA as an ex-officio member; I also supervise Physician Assistants, one of whom is the Medical Director for another volunteer ambulance service.

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

These comments are in response to ""Draft for Public Comment, Ver. 1 - 10/28/2033 - Med Board Changes |||Pages 1-3 - It is completely non-sensical to remove from the Board of Medical Examiners, the practice of medicine; yet by excluding Emergency Care Providers (EMTs of all levels), you have done this.|" ""2-15-1730. Defines the formation of an Alternative healthcare board. However, you have NO experience in Emergency Medicine even required on this ""representative board."" An EMT (no matter what level) does not have the requisite background and expertise to know what all is involved in the wider field of Emergency Medicine. | ""2-15-1731. This expertise already exists on the Board of Medical Examiners, yet your proposed rules ignore this expertise. The initial purpose of the BOME was to regulate the practice of medicine, to assure that the people of Montana were cared for by well-trained, competent and appropriate individuals. This is the direct purpose of supervision of EMT practice. |||Page 8 - in the Definition of the practice of medicine, this exactly what EMTs at all levels do every day, in circumstances that would take your breath away. And they do this because they have derived this skill and authority from physicians who have developed their training materials, and now supervise them.||Make no mistake, Emergency Care Providers (EMRs, EMTs, AEMTs, and Paramedics) all PRACTICE MEDICINE. It may be ""ditch medicine"" and they may specialize in dire circumstances and under-resourced conditions, but they practice medicine in those places. (Just look at their names: EMR - Emergency Medical Responder; EMT - Emergency Medical Technician; AEMT - Advanced Emergency Medical Technician; Paramedics - ""those who practice along side medics"" - doctors!)|||Page 15 - Section 6. ""37-13-103. Definitions. (3) ""Board"" means the Montana board of ""alternative healthcare"" - Again, Emergency Care Providers practice mainstream medicine in austere circumstances. They are NOT Alternative Medical Practitioners... what they do IS NOT Alternative Medicine. |||Page 20 - ""50-6-105. Emergency medical care standards -- review process. (1) ""The department of labor and industry shall establish patient care standards for: ... ""| |The DLI is NOT qualified to determine what is appropriate patient care. The BOME is: physicians ""establish patient care standards."" Lawyers and bureaucrats do not, and cannot. They do not have the requisite knowledge, background and skills to do so.||Your changes now indicate that SUDDENLY, by fiat, the DLI is capable of practicing medicine without a license. NO one at the DLI is capable of ""establishing patient care standards."" That IS the PRACTICE OF MEDICINE, and the DLI is not licensed to practice medicine... a department cannot be licensed, only a human person can be.|||Page 24 - ""50-6-203. Rules. (1) ... DPHHS is not qualified to determine the practice of medicine, either.||Emergency Care Providers are DERIVATIVE. They derive their knowledge, ability, and skill from those who have designed their training, educated them, and now supervise them: physicians - human beings, not departments.||Any obstacle - including the DLI, or DPHHS - that inserts itself between these Emergency Care Providers and the physicians from whom they derive their practice and authority, will be a detriment to the good patient care that the people of Montana - YOU ALL - deserve.|| ... and

(2) Page 24 lapping over onto page 25 - The DLI is NOT QUALIFIED to determine the "... acts allowed, ... and ... training, performance, ... of that level of emergency care provider..." because then the DLI is, in effect, practicing medicine. ||Thanks for the opportunity to comment. ||Any questions, please feel free to contact me: Cell 406-390-3334 or text, or possibly email, as I often do not answer calls from numbers I do not recognize.

Please provide your first and last name Carley Robertson

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232906  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|This affects massage therapists and the general public since the state can refuse to allow massage therapy reimbursement for workers comp, limits medical professionals referrals to massage therapists due to potential liability, state workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed, and it can affect massage therapists in chiropractor offices, hospitals, medical clinics, and hospice.

**Please provide your first and last name** Carol Murray

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232907  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 27 Reform Section 216 that repeals the statute. I oppose repeal of 27-22-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** elisa allen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232908  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because Massage Therapy is a healthcare profession and deserves that recognition in state law. I have worked as a LMT (licensed massage therapist) for 6 almost 7 years now. I have helped clients with chronic pain, heal from motor accidents, and many other types of injuries/pain. I have a few clients who even have doctor prescribed Massage to help with their chronic. This repeal will not only hurt your local LMT but those clients receiving medically prescribed massage as well as those who bill their insurance. Massage Therapy around the world has been considered a part of the healthcare profession please do not set Montana back even further then it already is. We have worked so hard in this state to be taken seriously as the health profession we are. I am so very glad to be a LMT and help those I can in pain. The main reason I became a LMT was to help those in pain. Thank you for your time.

**Please provide your first and last name** Delaney Sharbono

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232909  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Meditation and mindfulness teacher, Corporate Wellness Educator

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Massage and bodywork are an important component to wellness. It positively contributes to physical, emotional and mental health. I incorporate and receive regular bodywork sessions (as I do with chiropractor and acupuncture appointments) and they are an invaluable part of my health care routine. I help a lot of people with their trauma and to receive this care allows me to be at my best for others. I hold a masters in clinical psychology as well as a masters in social work. Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a health care profession and deserves recognition and protection in Montana's State Laws. Massage therapy is recognized by the medical profession to be a valuable modality for healing, recovery from injury and wellness. Thank you for protecting the mental, emotional and physical health of Montanans.

**Please provide your first and last name** Elaline Huang

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232910  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.

**Please provide your first and last name** DON D. BOYER

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232911  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|I have been a massage therapist in the healthcare profession for over 20 years. Please don't demean my education and experience in this way.

**Please provide your first and last name** Linda Anderson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232912  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Carolyn Rees

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232913  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from title 37 Reform Section 216 that repeals the statue. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Bennett Rees

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232914  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This is a dangerous and negligent decision to repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. |The idea that you could put people including you and your families lives at risk as well as make it not possible to receive medical|Massage is completely asinine

**Please provide your first and last name**

Charlene Beaudry

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232915  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law!!!|Massage therapists are dedicated in helping our clients/patients improve health and overall wellness. We are highly educated and passionate about what we do. There are so many health benefits to receiving massage on a healthcare level, anyone who has used professional massage therapy for healing the body can attest to this. Denying therapists the recognition of being "healthcare workers" is not only a disservice to the skilled profession of massage therapy but a damaging disservice to those who seek total body wellness. ||""Anyone wishing to study medicine must master the art of massage."" ~Hippocrates

**Please provide your first and last name** Danielle Payne

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232916  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Student about to finish massage school and become an LMT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. ||Massage therapy is absolutely essential for many in the medical world. From rehab from injury or surgery, to treating chronic pain and trauma to end of life care and so many other situations, massage therapy is proven effective time and time again. By removing LMTs from the realm of health care, you are not only putting the therapists out of work in hospitals, medical clinics, chiropractic and physical therapy offices, hospice and more but you are also making healthcare to those who utilize massage as a healing modality inaccessible. ||Having just completed a 750 hour massage therapy training, I can say first hand that we should be considered healthcare professionals. We complete over 80 hours of anatomy and well over half of that in physiology class with additional training that takes a deep dive in the medical field. This alone is enough to be considered healthcare workers, but even further we continue our education after becoming licensed with additional courses every two years. ||Think about yourself or someone you know who has had a referral, used insurance or sought out massage therapy after an injury, to help with stress or for any other reason. People use this modality every single day in the state of Montana and if you remove LMTs as healthcare workers , you will be committing a severe disservice to the residents of this state.||Keeping massage therapists as healthcare workers is essential, beneficial and a right to the health of all. |

**Please provide your first and last name** Melissa Rees

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232917  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am here to comment on the proposal to remove massage therapy as a health care profession. As a massage therapist whose office accepts motor vehicle and workman's comp claims I am extremely concerned with this action. Doctors, PTs and chiropractors rely on massage therapy for pain relief in many different diagnoses. LMTs play a major part in the healing process for many people who would not be able to afford care if not covered by insurance. Removing healthcare from our profession would be to deny so many the care they need for recovery. As more and more studies are conducted on the role of soft tissue and fascial manipulation plays on pain management the more the medical community is looking to us to be a part of pain management and solutions. Please do not degrade our profession or make it less accessible to those who need it.

**Please provide your first and last name** Meredith Killian

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232918  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute

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**Please provide your first and last name** linda fauhl

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232919  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|||||Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|||||Why is this important? \*\*\*\* |If we are no longer considered a healthcare profession,|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession|The state can combine our board with the cosmetology board|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers comp|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|State workers may lose the bility to be reimbursed by their flexible spending/health care benefits if massage is prescribed. |It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.|||||

**Please provide your first and last name** Jacque Hansen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232920  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute.||I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in Montana state law.||Massage therapists worked long and hard to license the profession and gain recognition of its value in palliative care, injury rehabilitation, and well-being. If massage therapists are not recognized as health care providers, this jeopardizes our ability to receive physician referrals ad work in settings like hospitals, clinics and hospice. It will also threaten insurance payment for services. Please do not repeal 37-33-402.||

**Please provide your first and last name** Sheehan Ednie-Rosen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232921  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because as a professional and licensed massage therapist in Montana, I understand that massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name**

Caitlin Spencer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232922  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Rose Shields

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232923  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. ||I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. ||In my practice I often receive referrals from other healthcare professionals and the majority of my clients are seeking relief from various health issues. I work with people who have acute and chronic pain, anxiety, severe stress, vertigo, tinnitus, concussive symptoms, traumatic brain injuries, migraines, stroke injuries, Autism, dementia, arthritis, plantar fasciitis, pregnancy etc. || At this time the healthcare system is struggling to keep up with the demand for it's services. Massage therapy helps to alleviate the suffering of those unable to receive timely medical care and as an adjunct to the medical care they do receive. ||If 37-33-402 is repealed it would open the profession up to regulation by boards who provide spa and beauty services or adult entertainment. It may affect healthcare professionals ability to refer their patients for massage therapy services and the ability of clients to have those services covered by insurance. Ultimately I believe it would lower our standards as a profession and the quality of services we provide. ||

**Please provide your first and last name** Debra Sommer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232924  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In the Title 37 Reform - Ver. 4 on Page 384 there is a new section: ""NEW SECTION. Section 216. {standard} Repealer.""||PLEASE REMOVE the reference in this section to repealing 37-33-402, which contains the purpose statement for establishing the Board of Massage Therapy and regulating the practice of massage therapy as a form of alternative health care. |This sentence is particularly important to keep: ""The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.""||If this section is stripped out, massage therapists would no longer be considered health care practitioners, and may lose the ability to be granted referrals from medical professionals, be reimbursed by insurance companies for personal injury claims (even if the massage was ordered by a physician) , and the list goes on. This could be especially detrimental to massage therapists working in medical settings (chiropractic offices, hospice, etc). Please do not do this repeal of 37-33-402!!

**Please provide your first and last name** Philip Robison

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232925  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that appeals the statute. I oppose repeal of 37-33-402 for the following reasons: Maintaining an established board to oversee licensure and credentialing of Massage Therapists and Massage therapy certification programs is critical to the safety of patients/clients and maintains the quality and credibility of massage therapy as a supplemental medical care system. Massage therapy patients can seek reimbursement from medical insurance providers for treatments if allowed in their policy. The removal of an overseeing board and associated regulations could end insurance reimbursement programs for some providers. Without partial or full insurance coverage, some clients maybe unable to afford massage therapy and would be unable to receive care. For some businesses, such as mine, these insurance programs account for a large percentages of revenue and the absence of insurance programs would result in significant financial losses. The credibility of the massage therapy profession is a direct result of board oversight and licensure which increases revenue for Massage Therapist such as myself and allows additional commerce to take place at my brick-and-mortar location and surrounding businesses.

**Please provide your first and last name** Sarah Bierut

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232926  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that appeals the statute. I oppose repeal of 37-33-402 for the following reasons: Out of consideration for my health and safety, as well as other members of the general public, I would prefer to receive bodywork and massage from licensed professions - individuals who have undergone training and examination under an overseeing board from an accredited school. I am concerned that the removal of a massage therapy board and associated licensure regulations, and the probable movement toward "certification program" based credentialing would greatly reduce the quality, professionalism, ethical training, and medical legitimacy of the massage therapy industry in the state of Montana. Furthermore, I fear that in the absence of licensure and regulations, the massage therapy industry in the state of Montana could deteriorate into a low class entertainment based/spa experience based industry that could run rampant with illegal sex work. Providers could be advanced upon by expectant customers and female providers could be assaulted due to blurred lines of professional conduct. This would damage the reputation of our state as a whole.

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**Please provide your first and last name** Alex Bierut

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232927  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||Testimonials of hundreds of my clients are that we massage therapists are far superior to drugs in pain management. And Often more cost effective. ||

**Please provide your first and last name**

Carla Green

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232928  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am submitting my comments in regards to the proposed repeal of MCA 37-33-402. I am a licensed massage therapist in a physical therapy clinic and work closely with other clinicians to provide the best health care we can. I oppose the repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. As we are a licensed profession and have to abide by board rules and face any repercussions for rule violations, there is no justification for removing the recognition as a health care provider under state law. |

**Please provide your first and last name** Liana Messer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232929  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. We worked extremely hard on this for years got turned down in Helena many times finally accomplished licensure July 2009... We are definitely part of the medical world a huge part. We work with pre-and post surgeries, recovery from accidents, strains and sprains we help people with awareness and educate people on their bodies with some sort of glitch or hang up going on. We show them what muscles are not cooperating as a team. We teach postural, we help them recognize things they don't even know they own in the muscle world that helps them move and function better/properly. It's not just about relaxation though that's a big part of it, it's definitely therapeutic and changes lives. We help add to a team of healthcare people helping other people with their recovery, their injuries, their awareness of their own physicalness. To remove massage therapy from the health world or even try to remove it is such a crime, a huge mistake we are definitely recognized in the medical world and nowadays with insurance and referrals, soap charts, recordkeeping we have stepped up and it is on the cutting edge. Most insurance companies are starting to recognize us as a huge help in recovery of accidents and injuries, we are a huge part of healing. It is situations like this, not backing us that causes them to exclude us in their wording throwing their own clients to the curb when trying to get help. I'm asking you to take the right stand and eliminate the wording that excludes massage therapy from healthcare in the state of Montana. Do the right thing here, keep massage therapy as part of peoples healthcare in Montana. Wendy Lee

**Please provide your first and last name** Wendy Lee

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232930  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Reference: 37-1-134 (4) page 39 I am opposed to striking and the boards. The board I sit on is unique in that we have minimal licensees to cover expenses of the Department. Currently we are having little to no services provided to our profession and I am wondering where the license fees are being spent. I received an email stating the Department just designated a second CEO for this board that isn't even operating; for what? The funeral professionals worked hard to keep our licensing fees stable by coming up with a great funding mechanism and the Department fought it all the way. Reference: 37-19-302 pgs. 184-185 and Reference: 37-19-702 pgs. 188-192 There is something missing here that the Department refuses to address. Crematory regulations fall under Funeral Services. The Department requires a substantially different set of qualifications for a mortician than it does for a crematory operator. One of the long standing and costly fights going on is the fact that we have crematory operators making at-need arrangements for cremation with families and that should be reserved for the licensed mortician. A crematory operator is allowed to run a crematory, their training affords them to run the machine. A line needs to be added to be clear: Arrangements (def. of funeral directing) for final disposition of a dead body, by any means: burial (direct or embalmed), cremation, removal from state, etc... is reserved for a person holding a mortician's license. It is in the best interest of the public health, safety and welfare and does not restrict anything to expect the same standards from everyone working in a profession.

**Please provide your first and last name** Ralph Mihlfeld

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232931  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Mt state crane license, one year/1000 hours experience vs practical exam.||The one year/1000 hour experience requirement can be bypassed ("in lieu of") by a state Practical test.|But not a Practical Nccco test for the national certification. | It doesn't make any sense.|The practical tests are equivalent. Therefore anyone with an NCCCO should not have to prove 1000 hours experience to get a state license.| Saying that the state practical has immense value and can bypass the 1000 hour requirement, But the national Crane license practical has no value to do so I believe brakes the law at 50-76-133. Recognition of national certifications.

**Please provide your first and last name** Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232932  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Double testing cranes||Its come to my attention that new crane operators have recently been required to double test. | They do all the work and expense to pass the NCCCO national certification but can't get a state license and have to get tested again. |The reason for why is that the new operator doesn't have 1000 hours experience yet. |The tests are Equivalent of each other, It makes no sense to Double test nothing is gained.| We should simply reciprocate national licenses if they are issued. |

**Please provide your first and last name**

Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232933  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Cranes||Practical test ""in lieu of experience""| If a practical test is used in Lou of experience for crane licenses and it is in Montana currently. | Then there is no 1 year 1000 hour requirement for experience. Because everyone has to take a practical test to get a license. |Whether it's the state practical test or the national Crane test, and it should not matter which one because they're equivalent.|According to 50-76-133|

**Please provide your first and last name**

Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232934  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Cranes||Practical test ""in lieu of experience""| If a practical test is used in Lou of experience for crane licenses and it is in Montana currently. | Then there is no 1 year 1000 hour requirement for experience. Because everyone has to take a practical test to get a license. |Whether it's the state practical test or the national Crane test, and it should not matter which one because they're equivalent.|According to 50-76-133|

**Please provide your first and last name**

Allen White

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232935  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Med Board Changes, Page 24, 50-6-203 Rules. EMS & Trauma is a program and well suited for management of the entire program. 1 states that DLI after consultation with DPHHS and other departments shall adopt rules regarding training and licensure of ECPs, the administration of drugs by ECPs, (which to me means protocols) and handling of complaints. Who at the DLI has the knowledge to drive these protocols as there is currently no statewide EMS Medical Director or Administrative Director for EMS within DLI.

**Please provide your first and last name**

William Torres

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232936  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.

**Please provide your first and last name**

Brooke Heller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232937  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Melanie McGrath

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232938  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Shane Murphy

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232939  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Dustin Burton

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232940  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft Ver 4 - 11/4/2022 Title Reform 4|I oppose removing massage therapists (37-33-402)from Title 37 (proposed Reform Section 216).|Massage therapy has researched-based health benefits. Licensed massage therapists are held to high standards of ethics, knowledge and continuing education requirements. Massage has been shown to prevent unnecessary and much more expensive medical treatment. Standard medical model treatment is the 3rd leading cause of death in the USA. Massage therapy, by contrast, is not lethal. Montana has been a leader in sanctioning complementary medical options to the benefit of its citizens. It is short-sighted to abandon oversight leaving the public at the mercy of charlatans.

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**Please provide your first and last name** Catherine Metsch

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232941  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** Alyssa Neff

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232942  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because.....massage therapy is a healthcare profession and deserves that recognition in state law.||Why is this important? |If we are no longer considered a healthcare profession, It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession. The state can combine our board with the cosmetology board|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved. The state can refuse to allow massage therapy reimbursement for workers comp Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|State workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed. It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

**Please provide your first and last name** Dodi Hurd

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232943  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||Removing Massage from the healthcare profession will be a major disservice to all healthcare.

**Please provide your first and last name**

Eric Hart

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232944  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose the repeal of 37-33-402 because massage therapy is a healthcare choice and should be treated as such through the governing bodies of licensure. If 37-33-402 is repealed, it threatens the livelihood of small business owners who depend on referrals from medical doctors and insurance reimbursements for medical massage treatments. By keeping section 37-33-402 in annotation, you are maintaining the integrity of the practice of massage therapy, which does affect the health, safety, and welfare of the people in this state.

**Please provide your first and last name**

SARA TROTCHIE

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232945  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Rose Shields

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232946  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||((2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:En. Sec. 2, Ch. 451, L. 2009.|| ||NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None|| ||The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. || ||Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider.|| ||As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing)

Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! Sincerely, Sara Dunn LMT 1369 Sophie Lake Rd Eureka, MT 59917 406-291-0723

Please provide your first and last name Sara Dunn

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232947  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. As a massage therapist, not being recognized as a Healthcare professional would be an awful set back to myself and the industry as a whole.

**Please provide your first and last name** Steven Wallace

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232948  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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of governmental operations. I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! Sincerely, Robleigh Reagher

Please provide your first and last name Robleigh Reagher

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232949  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

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**Please provide your first and last name** Christine Mayer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232950  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

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Other: Massage School Owner & MT Licensed Massage Therapist

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Message Training Institute |1500 Airport Rd.|Kalispell, MT. 59901|Michael Eayrs Director|11/014/2022|To the Red Tape initiative,|There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.|The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. |37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.|(2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.|History:?En. Sec. 2, Ch. 451, L. 2009.||NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10-105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None||The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapist in other states as inferior by title and Montana state law description. ||Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. ||As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer

list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. ||I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! ||Sincerely,|Michael Eays|

Please provide your first and last name Michael Eayrs

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232951  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:En. Sec. 2, Ch. 451, L. 2009.|| [NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | |I have been a practicing licensed massage therapist for the past 23 years in Montana. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists. This would certainly not be in line with improving the

efficiency of governmental operations. | I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration!! Sincerely, Jamie Lynn

Please provide your first and last name Jamie Lynn

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232952  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from the Title 37 reform section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Massage therapy can contribute to a patient's physical and emotional health and well being - often alone or as an adjunct therapy to other medical treatments. I am a Registered Nurse, and I have witnessed the positive effects that massage therapy can have on my patients.

**Please provide your first and last name**

Tracey Allen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232953  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Zoe McGowan

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232954  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from the Title 37 Reform Section 216 that repeals the statute. While I appreciate the Red Tape Initiative to reduce redundancy and waste, unfortunately including 37-33-402 in this initiative unwittingly does exactly the opposite for the massage therapy profession. MCA 37-33-402 is the only place in Montana law where massage therapy is designated as health care. The initiative to repeal 37-33-402 does nothing to reduce redundancy in the massage therapy profession and instead lays waste to an entire professional entity with the declared purpose of contributing to choice in health care and affects the health, safety, and welfare of the people of MT state. As a licensed massage therapist in the state of MT, my services to the people in the state of MT are entirely health-care related. Most of my clients come from referrals in the health care industry (i.e. Chiropractors, physical therapists, oncologists, obstetricians, physicians to just name a few). The repealing of 37-33-402 unethically removes the status of massage therapists as health-care practitioners and places them in a vulnerable position both economically and professionally. States that have not held massage therapists to health-care status have typically been the ones that battle sexually oriented services being provided under the guise of massage therapy. Economically, the repeal of 37-33-402 would in essence dismantle the referrals from health-care professionals that many massage therapists rely upon as their source of income. This also impacts the consumer in MT from receiving referrals to improve their health and limit insurance reimbursement. I have spent the past 3 years steeped in education to receive my graduate degree and license in massage therapy to improve the musculoskeletal health of people in the state of MT. Repealing 37-33-402 will have made these past 3 years a personal wasted effort for the state of MT. I ask you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration. Respectfully, Angela Nye - MS, LMT, CSCS

**Please provide your first and last name** Angela Nye

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232955  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. As a massage therapist it is very important for our profession to be taken seriously as healthcare. Under ""healthcare"", massage will also be recognized further by insurance, which allows those who need treatment the most to receive care.

**Please provide your first and last name**

Chloe Keller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232956  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below. ||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||(2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:?En. Sec. 2, Ch. 451, L. 2009.|| |NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10-105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37-25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33-402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | |As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage

therapists. This would certainly not be in line with improving the efficiency of governmental operations. | I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! | Sincerely, Chloe K

Please provide your first and last name Chloe Keller

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232957  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Ashly Siaperas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232958  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. || ||Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Colin Sherrill

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232959  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Eric Words

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232960  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: soon to be LMT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Rio Hammond

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232961  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. To the Red Tape initiative. There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below. The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. 37-33-402. Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care. (2) It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession. History: En. Sec. 2, Ch. 451, L. 2009. NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10-105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37-25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33-402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to "eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations." The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true "Healthcare Professionals" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration!

|Sincerely,|Kaylee Schaff, LMT

Please provide your first and last name Kaylee Schaff

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232962  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose the repeal because massage therapy is a heal care profession and deserves recognition as such. I work on clients often who are there for therapeutic reasons wether it be a recent injury or from an accident in the past. I think it would be a disservice to take away its medical status not only for health insurance recognition, but it would make it even easier to use massage ""parlors"" for sex trafficking which is a serious problem in Montana. Please reach out to me if needed.

**Please provide your first and last name** Jenny Smith

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232963  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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|Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events,, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Gary Willstein

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Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232964  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide your first and last name** Holly Hamilton

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IP Address:  
Unique ID: 1052232965  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program."" Being an athletic trainer who was educated in the state of Montana, I strongly oppose Version 1 - ATR Board to Program and have seen first hand what can happen without athletic trainers providing health coverage-lives are put at risk.

**Please provide your first and last name** Madison Siebenaler

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232966  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a health care profession deserving recognition in state law. As a licensed massage therapist in this state I work with clients in pain, with injuries, pre and post surgery, post cancer treatment. I provide health care daily to my clients as I have for 30 years here. Please continue to value and recognize what I do as health care. Thank you.

**Please provide your first and last name**

Debra Shorrock

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232967  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|I have been a massage therapist for 20 years, certified lymphedema therapist for 16 years and a PTA for 9 years. Even before becoming a PTA my services were consider part of peoples health care. I would with doctor referrals and chiropractor referrals. Please do not lump us into service industry like getting hair or nails done or confused with elicit activities.

**Please provide your first and last name** Candy Van Frachen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232968  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||Massage therapy is a very effective form of health care that works great with physical therapy and chiropractic care to get patients back to a healthy state after injury. Changing this law would take away those referrals from doctors for massage therapy which in return would hurt the patients healing process and long term outcome.

**Please provide your first and last name** John Ellis

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232969  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. As a female massage therapist I worked very hard to establish my business as a healthcare one, and now I will not only lose my patients, but also be a subject to unwanted sexual attention.

**Please provide your first and last name**

Irina Gernaey

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232970  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||Removing the healthcare designation for massage therapy ignores decades of research and legislative precedence which has led the way to legitimizing massage therapy as a viable alternative to costly medical procedures and prescription drugs for many conditions and, quite frankly, moves Montana backwards. ||Many medical colleges include curricula for massage because it has been shown to increase healing time and decrease psychological stresses associated with medical emergencies and procedures. ||Obstetricians, neo-natal nurses, midwives, and birthing support staff understand the importance of providing a variety of massage therapy modalities from pre-natal through post-partum, as well as infant massage. NIH, as well as the Touch Therapy Institute, provide several studies on the implications of massage on pregnancy, labor and delivery, post-partum depression, mother/child bonding, ease of breast feeding, and recovery from difficult birthing experiences.||Touch therapy studies are also widely available in the fields of psychology and psychiatry which demonstrate a reduction in anxiety and depression as a result of regular massage therapy sessions. (pubmed.ncbi.nlm.nih.gov Mar 2012; Neural correlates of a single-session massage treatment) Studies also show that massage accelerates brain development. (Journal of Neuroscience 6 May 2009, 29 (18) 6042-6051; DOI: <https://doi.org/10/JNEUROSCI.5548-08.2009>)||In addition to the implications removal of massage therapy as healthcare would have in the healthcare community, categorizing it as adult entertainment opens the doors to human trafficking in Montana much wider and endangers the thousands of licensed therapists currently legally working in this state.||In conclusion, I ask that you seriously reconsider the demotion of massage therapy from the rank of healthcare profession.||Thank you for your time.

**Please provide your first and last name** Jillian Boucek

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232971  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Leesah Lemm

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232972  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||| oppose repeal of 37-33-402 because|||massage therapy is a healthcare profession and deserves that recognition in state law.||| have worked long and hard and have spent a tremendous amount of money educating myself and others, it's not at all fair to say we're not health care practitioners

**Please provide your first and last name**

Linda Holenstein

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232973  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Melissa Nickol

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232974  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|I do believe that massage therapy should be considered part of healthcare as it is typically offered as treatment to many medical conditions and to aid with improving the patients health. There are various types of massage techniques which aid to trigger different responses in the individuals body. Additionally, massage therapists evaluate their clients similarly to other healthcare professionals and create customized treatment plan to meet the specific individualized needs. Massage has been shown to increase range of motion and flexibility - which both aid to decrease injury on the job. Massage also aids to decrease anxiety, depression and stress and can increase feelings of relaxation and calmness - which positively impacts individuals health in decreasing pharmaceuticals used, improving sleep quality, improving productivity and overall positively impacting one's overall wellbeing.

**Please provide your first and last name** Kathryn Mock

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232975  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Montana state crane license. |The insurance companies and big business in Montana know the truth about the Montana state crane license and had it figured out years before everyone else. That's why if you work for any sort of big business you also have to have a certification in addition to a license. The license is seen as a tax and the certification proves competence. The businesses realized that the Montana state crane license department is too wishy-washy, inconsistent and weird to provide any sort of substance or value to any business that has real liabilities. |Let's take a look at just the qualifications for the state crane inspector. Does the inspector look at cranes? No. |His job is to administer tests and check on operators to see if they have crane licenses. |The inspector without having any sort of training or certifications is supposed to test the crane operators on multiple types of cranes that the inspector may have never really been around. |He is required to have a state license for a crane. But in the real world that state license won't get you a job anywhere good. |The state crane department can't be an island, currently they're ignoring the federal government, the businesses, and the people that hold the licenses, and at some point they have to start listening to someone else.

**Please provide your first and last name** Allen White

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232976  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hi!!From Page 384 of Title 37 Reform, Ver. 4: Please remove 37-33-402 from Title 37 Reform, Section 216 that repeals the statute!!I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. If the healthcare designation is removed, it accidentally legitimizes those who use massage as a cover for sex worker activity and calls into question the work of those of us who help rehabilitate people with injuries.|PLEASE do not take the healthcare designation away.|All the best,|Michelle Clement, MDiv, MBA, LMT

**Please provide your first and last name**

Michelle Clement

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232977  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||Veterans deserve to have access to massage just the same as clients that have been in an accident we need to keep massage in the health care field. ||

**Please provide your first and last name**

Stephanie Colley

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232978  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

My comment is for the Massage Therapy Board. I am opposed to the changes or the repeal proposed to 37-33-402. I support keeping this statute exactly as written already. Massage therapy is a health care profession. We are one of many choices people make relative to their health care decisions. We are allied health care professionals. We refer to other health care professionals and receive referrals from them. This rule is clear, it is not repetitive and it is very important to the massage profession.

**Please provide your first and last name**

Patricia Ryan

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232979  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||If we are no longer considered a healthcare profession:||It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession||The state can combine our board with the cosmetology board||Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.||The state can refuse to allow massage therapy reimbursement for workers comp||Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.||It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

**Please provide your first and last name** Melissa Miculka

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232980  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To the Red Tape initiative,|There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below. |The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. |37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care. |(2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession. |History: ?En. Sec. 2, Ch. 451, L. 2009. |NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37-25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | |As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage

therapists. This would certainly not be in line with improving the efficiency of governmental operations. | |I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! |

Please provide your first and last name Tracy Miotke

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052232981  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hello. The three comments below are submitted on behalf of the American Institute of Architects (AIA) Montana Chapter, an organization comprised of architects and architecture licensure candidates residing in Montana. Thank you.

1. Board Consistency Reform, Ver. 2. New Section 3. Appointment - Qualifications - Terms. (5) Conflict of Interest on Pages 7-8.

a. We would recommend that serving in organizations that support Boards and related public safety, such as the National Council of Architectural Registration Boards (NCARB) and International Code Council (ICC), be clarified as not a conflict of interest for members of the Board of Architects and Landscape Architects. | b. We recommend this change because the Montana Board of Architects and Landscape Architects is a member of NCARB, as is each state's licensing board. The members of the Montana Board of Architects and Landscape Architects serve on this organization's board and committees as NCARB directly supports the Montana Board in facilitating licensure and development of national standards that eliminate red tape in the licensure process.

2. Board Consistency Reform, Ver. 2. Section 29. 2-15-1761. Board of architects and landscape architects on Pages 41-42.

a. With the reduction of the number of board members from 5 to 6, we would recommend one of the following changes:

i. Elimination of the teaching experience requirement for one of the architect members under item 2 (a). There are currently 521 active licensed architects residing in Montana, of which only 8 have current teaching experience. This requirement for teaching significantly limits the availability of engaged board members.

ii. Revising to three architect members and one landscape architect member in lieu of two architects and two landscape architects. While there are currently 521 active licensed architects residing in Montana, there are 61 active licensed landscape architects in Montana. This revision would proportionally represent architects and landscape architects on the Board in support of engaged board members.

3. Public Building Definition Conflict. Not currently addressed in the draft reforms.

a. There currently exists a conflict between the definition and application of public building in two existing sections of Title 37 that we would request consideration of clarifying in the proposed reform.

i. 37-65-102 (6) defines a "Public building" as any building that the state of any political subdivision of the state maintains for the use of the public.

ii. 37-65-103. Exemptions. Causes conflicts under item 4 (c) and (d) with the definition above.

a. 4 (c) creates an exemption for residential construction consisting of less than eight living units or farm buildings that are not intended for use or used as a public building.

b. 4 (d) creates an exception for construction of a building by its owner if the building is not intended for use or used as a public building.

iii. This could be clarified to create consistency within the statute, red tape relief, and increased public safety by changing the definition of public building to not only include state maintained buildings but any building occupied by the public and allowing for full exceptions as intended under items 4 (c) and (d)

Please provide your first and last name Shannon Christensen

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232982  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute.|| I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.| I have been a medical massage and injury recovery provider for 22 years and work closely with doctors,PT's and chiropractors to ensure that my clients receive the best care possible and improve their quality of life after an accident or injury. My fear is that this would allow insurance companies to deny massage care, when it is such a valuable therapy. It could also lump us in with cosmetologists and sex workers which is absolutely unacceptable. ||

**Please provide your first and last name**

Shanon Eff

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232983  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||((2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:?En. Sec. 2, Ch. 451, L. 2009.|| ||NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None|| ||The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. || ||Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider.|| ||As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing)

Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. || I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! || |Lena McAnally, LMT,NMT|

Please provide your first and last name Lena McAnally

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232984  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Tasha Kohlwes

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232985  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from the title 37 reform section 216 that repeals the statute. I oppose repeal of 37-33-402, because massage therapy is a healthcare profession and deserves that recognition in state law. I have been a massage therapist since 2003 and worked in many settings including MD offices. A huge complaint of why patients see a primary provider is related to back pain. When guess what can actually bring relief to patients...massage. Which helps address the problem, bring effective care and improve their quality of life. As a practicing RN as well I see so much healthcare benefits to patients in a majority of settings from hospice care, sports injuries, major physical complaints of patients, as well as the growing awareness of mental health and the benefits of massage to someone experiencing anxiety, depression, and the like. I am surprised to hear that it has been even considered to not include massage therapy as healthcare. Do better Montana.

**Please provide your first and last name** Rebecca Curtiss

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232986  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|It is a great preventive medicine.

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**Please provide your first and last name** June Voldseth

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232987  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Given my position on this board, I hope it goes without saying, but following my application and nomination to the Governor's Board of Athletic Training this year, I am against the proposed ""Version 1 - ATR Board to Program"" for many reasons. I've tried to understand the logic behind this move since the initial draft was sent out, but I just can't seem to understand the logic behind this decision. Supporting a proposal to eliminate the very Board that I sit on as a member seems foolish, short-sighted, and alienates our profession from our healthcare peers whose Boards will remain intact if this proposal is approved. ||There is a reason why myself, JC Weida, Kerianne Fuller & Nichole Borst sought out our positions on this Board; the future of our profession mattered to all of us so much that we were willing to donate our time in order to ensure that Athletic Trainers serving on this board would be the ones making licensure decisions on behalf of our fellow Athletic Trainers in the state of Montana. ||I am certain that this decision will undoubtedly put the health and safety of the athletes we work with on a daily basis at risk. Therefore, I want to state as clearly as I possibly can that I strongly oppose moving the Athletic Training Board to a Program, and would ask that you all reconsider this unnecessary initiative. |

**Please provide your first and last name** Taylor Purchio

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232988  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I have been a MT-Licensed Massage Therapist for 8 years. I have been able to become a certified John Barnes Myofascial Release therapist, due to massage therapy being recognized as a health profession. In my continuing education courses my peers are (physicians, nurses, physical therapist, occupational therapist, massage therapist, licensed health care professions ect. from all over the world). Many of these health professionals get their massage therapy licenses to be able to apply Myfascial Release principals to their clients/patient. Why would these health care professionals continue their education in massage therapy, if it was not a recognized health profession. I personally work with clients whom have chronic pain, and or on hospice. If this passes it will greatly impact my business. Why is this important? If we are no longer considered a healthcare profession: (1) It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession. (2) The state can combine our board with the cosmetology board. (3) Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved. (4) The state can refuse to allow massage therapy reimbursement for workers comp. Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it. (5) State workers and others may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed. (6) It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied. Thank you for your time. Elizabeth Lorenz -LMT

**Please provide your first and last name** Elizabeth Lorenz

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232989  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 for the safety of my clients. I have trained hard, and continue to do so to better serve my clients. I understand that massage therapy to the naked eye may seem unimportant. I had no idea of the extent that I was getting myself into. A massage therapist needs to be educated on bones, muscles, nerves, the circulatory system, and pathology to keep our clients safe. If a massage therapist has to endure the same depth of information as a Radiology Tech, or a nurse, how can it be considered anything less than a healthcare profession? Lets say, I have a client come in who has Carpal Tunnel Syndrome, inflammation or entrapment of the nerves. I need to make sure that I know the anatomy of the area. I need to be aware of the medical history, and specific evaluation tests (Tinel's or Phalen's) to be the most beneficial in developing a treatment plan. Among those, a massage therapist needs to address the pronator teres, the shoulder, cervical region and any other area the median nerve might be compressed. Did you know that if an individual has a history or neck or shoulder injuries that Carpal Tunnel Syndrome is common because of the compressed nerves within the muscles? Communicating with other healthcare providers (the clients doctor), is the most beneficial to provide my client with a comprehensive treatment plan. Perhaps, I have a client who is a cancer survivor. She had the cancer removed, a skin graph done, and lymph nodes removed on her right side of her neck. She is a candidate for massage, but when she comes in she has extreme swelling of her right arm; lymphedema. My client is able to receive the massage, the area of her lymphedema must be completely avoided. Treatment of where the lymph nodes were removed, can only have light massage. Massage is a great palliative care plan for cancer patients. If you remove massage therapists as a healthcare provider, you're taking away the possibility for sick loved-ones to receive care through insurance. The below message is from my instructor. I completely agree and his words were too good to not place in mine. "The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to "eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations." The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true "Healthcare Professionals" for specific

treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations." -Michael Eays||It is my sincere hope, that you strike the repeal of 37-33-402 from Section 216. Thank you for your understanding. Sincerely, Shana Brewer

Please provide your first and last name Shana Brewer

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232990  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Brad Beffert

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232991  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||I was professionally trained in a Physical Therapy office for the first five years while building my Massage Therapy practice. I have practiced for 22 years now. I am a healthcare professional and my clients depend on me staying in the healthcare industry. |I do not want to see our profession be marginalized by the government. We as therapist are trained in several healthcare therapies so why would we be considered otherwise?

**Please provide your first and last name** Donna McDonald

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232992  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Do not strike the following language on Page 321: ||However, an unlicensed person may not use the title ""landscape architect"", ""landscape|architecture"", or any description tending to convey the|impression that the person is a licensed landscape|architect unless the person is licensed as provided in this|chapter. ||Without this language, anyone can present themselves as a Landscape Architect and clients may hire unqualified individuals for their projects.

**Please provide your first and last name**

Troy Shcerer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232993  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I strongly oppose ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.

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**Please provide your first and last name** Sara Worrall

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Unique ID: 1052232994  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose the repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. If the healthcare designation is removed, it accidentally legitimizes those who use massage as a cover for sex worker activity and calls into question the work of those of us who help rehabilitate people with injuries. As a Licensed Massage Therapist, I have had extensive schooling and training which goes further with continuing education needed each year. I consider myself a valued member of the healthcare community for the care that I provide to my clients. PLEASE do not take the healthcare designation away. Respectfully, Anna Fausnaugh, LMT

**Please provide your first and last name** Anna Fausnaugh

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232995  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I oppose repeal of 37-33-402 because massage therapy is a Healthcare profession that deserves recognition under state law. The massage therapy board is an integral part of maintaining professional standards and ethics in Montana.

**Please provide your first and last name**

Dana Kraft

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232996  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Title 37 reform Page 236-237 37-33-502 Massage Therapy license requirements. (a) Successfully completed massage therapy education of a minimum of 500 hours. Please change to 650 hours to be in compliance with the massage compact requirements that have been purposed.

**Please provide your first and last name** Eric Hart

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232997  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. As a licensed massage therapist for the past 14 years those referred by medical professionals, such as doctors and physical therapists, have been the bulk of my patients. Those hurt from car accidents and on the job site injuries would have a monumental gap in care if they were unable to be referred to, receive, and bill for massage therapy. I say this as a professional who has worked on such individuals and as a patient who has had to seek out treatment for both examples given.

**Please provide your first and last name** Patience Ricahardson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232998  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Melinda Leas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052232999  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

We are writing to reply to the request for public comment on the "Red Tape Relief Initiative," as it relates to mental health counselors. We have both been licensed clinical professional counselors since 2006 and 2005 respectively and are master of science graduates of Montana State University. |Please reference Ver. 10/3/22, page 11, BHH Consolidation New Section, Section 3, part (2) strike, "a communication that otherwise would be confidential reveals that the client or another person is contemplating the commission of a crime or," add the word "client or others," in its place. Full sentence fragment reads, "when a client or others reveal a threat of imminent harm to themselves or others." |Please reference Ver. 10/3/22, page 11, BHH Consolidation New Section, Section 5 Exemptions from Licensure (1) Strike the words, "do not prohibit:" This double negative is confusing. Replace with word, "allows." The final wording should be, "The respective license requirement in this chapter allows:" |Please reference (a) on Ver. 10/3/22, page 11. Strike the word "from," replace with the word "to," this replacement occurs in 2 places in this paragraph. Change word "preforming," to "perform," this occurs twice in this paragraph. Strike the second "or," so that sentence fragment reads, "...qualified member of another profession who is not licensed to perform duties..." Add or implication following word "title," so it reads, "the persona does not represent by title or implication, that..." At end of this paragraph, strike the semi-colon, add phrase, "or mental health counseling." |Please reference (b and c) on Ver. 10/3/22, page 11. Strike all of these sections. Volunteers, federal, state, county and local employees and members of charitable organizations and employers are not trained to offer counseling. Counseling is a highly trained profession guided by professional ethics, continuing education, accountability, consultation and professional discretion. Non-counselors are not trained to provide counseling, it is not part of their professional duties. |

**Please provide your first and last name** Pamela Leach

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233000  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Title 37 reform:|If we are ""removing red tape"" I still strongly encourage easier, more accessible ( and actual bridge) programs for LPN professionals to achieve their RN licensing to assist in denting the nursing shortage and encourage our statewide LPN community to continue to stay and assist the Montana community. Especially for Critical Care Access areas and rural areas.

**Please provide your first and last name**

Kender Beeler

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233001  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am opposed to 37-33-402. As a massage therapist I have been able to see firsthand how massage therapy assists a body to heal. By no longer considering this profession as irrelevant to the health care industry you are harming many people from being helped mentally and physically. The benefits have been proven through years of tests and many chiropractic offices, hospice, hospitals, medical clinics refer patients to massage therapist. It is indeed a vital link in the medical field.

**Please provide your first and last name**

Terri Hensley

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233002  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|I'm a licensed massage therapist, who is also a retired Registered Nurse. Massage therapy is extremely important for patient healing. As a massage therapist, I have had patients referred to me for massage therapy from Medical Doctors, Psychiatrist, Psychologists, Physical Therapists, and Chiropractors. These patients come to me with both physical and emotional injuries and pain. Massage therapy is key in helping them to heal physically, and for some mentally as well. It is extremely important that massage therapy is considered and seen as being an important component of the health profession because it is an extremely important part of patient healing. Massage therapist ARE healthcare professionals and our licensing board should recognize us as such. Please, it is extremely important that massage therapists continue to be a part of patient healing and health and that we are always seen and referred to as health care professionals. Sincerely, Linda Murphy, LMT and retired RN.|

**Please provide your first and last name** Linda Murphy

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IP Address:  
Unique ID: 1052233003  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||Massage therapy is a healthcare profession and deserves that recognition in state law.||I am a service provider who has worked on dozens of motor vehicle accident patients referred to me under medical necessity, and have billed personal injury claims for all of them. Many have reported seeing significant relief after adding a bodyworker to their care team.||Massage therapists specialize in soft tissue softening and lengthening. Which is a crucial part of recovery for many soft tissue injuries. ||This change in policy would fly in the face of scientific evidence merited by academic, peer reviewed journal such as the Journal of Bodywork and movement therapies.||This change could directly effect my medical massage practice, and remove access of crucial care for many of my clients suffering with severe pain from injuries at work or from mva's. ||Please, look to science, and the professionals in this field for guidance on this change. It would negatively impact the entire industry, and those who rely on it for medically necessary treatment.

**Please provide your first and last name** Isaiah Duff

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233004  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Massage therapy is often more of a preventative and beneficial form of healthcare than our country's so called healthcare system. Let massage therapists be a vital part in our efforts to restore and maintain people's health and wellbeing!

**Please provide your first and last name**

Lia Hardy

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233005  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose it because It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession.||The state can combine our board with the cosmetology board||Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.||The state can refuse to allow massage therapy reimbursement for workers comp||Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.||State workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed. ||It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

**Please provide your first and last name** Jill Hermes

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233006  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name**

Kacie Kolar

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233007  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||The implications of removing this section from our state law could be a vary big deal not just for Massage Therapists but for Montanans in general. Currently massage therapists can submit to insurance for car accident claims/workers comp claims as well, clients that have a health savings account can use that money towards massage because it's preventative care. ||Not everyone has the financial stability to afford massage especially when working through an injury and the frequency that they might need to come in while working through said injury. Massage plays a huge role in the healing process and it's best when accompanied with physical therapy and chiropractic care. This could be a huge expense for the average Montanan if we are no longer seen as healthcare professionals.

**Please provide your first and last name** Theresa Vondra

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233008  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I strongly oppose ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. ||| |Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. |Dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. | | |Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program."" | |

**Please provide your first and last name** Douglas Hashley

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233009  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. |Hi my name is Alex Jokela, LMT #9963 and I oppose the initiative of repealing 37-33-402. This would harm roughly 500 Montanas that choose massage therapy as a part of their health care from my practice in Billings. Massage therapy is ionally considered complementary and alternative medicine and removing the repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider.

**Please provide your first and last name** Alexandria Jokela

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233010  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

**Please provide your first and last name** Elise Brady

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233011  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from the Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in State Law! I would not be able to continue in the profession I am in without these therapists. They deserve to be recognized as health care professionals and not adult entertainers.

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**Please provide your first and last name** Deborah Warren

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233012  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Cathy Hansen

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233013  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Retired clinical medical health professional

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Shelley Eisenrich

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233014  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I am self insured however, since I started doing regular message therapy my health has improved to the point of being able to hold position in laundry and one year prior to this I could not have done this job.

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**Please provide your first and last name** Rhonda Davis

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233015  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. This is an important and beneficial safeguard for so many

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**Please provide your first and last name** Lores Porter

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233016  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Previous Prof. Certified Massage Therapist in the state of Montana  
Massage

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Title 37 Section 216 37-33-402 I am in opposition of removal of this as Massage Therapists are a profession recommended by doctors, chiropractors, trainers of professional and non-professional sports and many others. The patient needs to know they are getting a proficient practitioner of massage. The education requirements for massage therapy and continuing ed that are required by a Board ensures that the profession stays current, proficient and safe. Massage therapy is a healthcare profession and deserves that recognition in state law. Do not repeal 37-33-402!

**Please provide your first and last name** Mary Warthen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233017  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. ||Dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy.

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**Please provide your first and last name** Karsten Williams

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233018  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

---

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations.

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**Please provide your first and last name** Karen Brady

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233019  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

PLEASE remove 37-33-402 from Title 37 reform section 216 that repeals the statute. ||I oppose repeal of 37-33-402 because massage therapy IS a healthcare profession and deserves that recognition in state law. ||Please consider the implications this could have on the legitimacy of all the professional massage therapists throughout the state who have upheld our standards, reputations, and businesses-in doing so, setting us apart from businesses disguised as massage therapists. Please don't set us back in time.

**Please provide your first and last name**

Kelly Herrera

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233020  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Melissa Wustner

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233021  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|The work we do to help humans feel better in their bodies is exactly what are health care system needs to acknowledge and embody. |

**Please provide your first and last name** eliza schwindt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233022  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Massage as Healthcare is in trouble - Action needed please!|We missed a critical part of the new proposals to change our statutes.|And boy, is it a doozy!! The state is going to remove the statute that says we are a healthcare profession!!|We need all hands on deck on this one.|There are two things to do NOW:|Please write in and oppose the change. AND|Please show up and comment at the virtual meeting. On Nov 17 at 10am (2 hours).|A third thing to do is to start talking to legislators you know about this.|We'll say why below, but wanted the how to's up front!||How to Register for the Nov 17 Meeting|Go here:  
[https://mt-gov.zoom.us/webinar/register/WN\\_Cb17XaeCQwi2Ca9qS\\_92xw](https://mt-gov.zoom.us/webinar/register/WN_Cb17XaeCQwi2Ca9qS_92xw)|  
EDIT: If you go to the meeting, be sure to leave a comment in the chat, otherwise they won't know why you are there. You could say that you're a massage therapist and you want them to strike 37-33-402 from section 216 in the Title 37 reform bill. Massage is healthcare and that section shouldn't be repealed!||How to leave a comment:|Go to  
<https://boards.bsd.dli.mt.gov/educational-sessions>|Scroll down to Comment Submissions|Fill out the form and Cut and paste the following into the comments:|Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||Why is this important? |If we are no longer considered a healthcare profession,|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession.||Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers comp|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|State workers may lose the bility to be reimbursed by their flexible spending/health care benefits if massage is prescribed.|It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.)||I am a massage therapist licensed in both Alaska and Montana. |In Alaska, I am seen as a autonomous health care provider and can bill health insurance under most plans without being overseen by a doctor. The state of Alaska Not only acknowledges us as licensed professionals but|Health care providers.||Please stop stripping massage therapists of our rights and legitimacy. || |Sincerely,|Tammy Gifford LMT|Alaska license 118090 |Montana license 19995|Owner of Maika'i Massage and Bodywork ||

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**Please provide your first and last name** Tammy Gifford

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233023  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below. ||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||(2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:?En. Sec. 2, Ch. 451, L. 2009.|| |NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10-105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37-25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33-402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | |As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage

therapists. This would certainly not be in line with improving the efficiency of governmental operations. | I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! | Sincerely, John Loucakis, LMT

Please provide your first and last name John Loucakis

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233024  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

the Red Tape initiative.||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:?En. Sec. 2, Ch. 451, L. 2009.|| [NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | |As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing)

Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. | I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! | Sincerely, Lorelei Loucakis, LMT

Please provide your first and last name Lorelei Loucakis

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233025  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|

**Please provide your first and last name** Brandi Hyatt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233026  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy has a long history in this country of being misconstrued as a sexual-services business, or otherwise denigrated from being a healthcare service. If we lose our designation as a healthcare profession, it will cheapen and degrade the value of the service we provide. Insurance companies and other interested parties need no longer compensate or value massage and massage therapists in Montana as a healthcare profession. Many of us help, hold, and heal our patients medical issues every day. Passing this bill opens a path to make it more difficult for patients to get the care they need, and therapists to get the compensation they deserve. It can be a pain to comply with regulations, board certification, etc. But if it keeps the government from throwing me in with sex-workers and cosmetologists (no offense- just verry different from what I do for a living) then its worth the trouble. Massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Alan Worf

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233027  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Having Multiple Sclerosis, I utilize massage therapy regularly to help alleviate the pain of muscle spasticity. ||Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|| I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Darlene Jasper

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233028  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||

**Please provide your first and last name** Lindsey Lehman

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233029  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Chantal Langlois, LMT|Massage by Chantal, LLC|191 Jewel Basin Ct, #4A |Bigfork, MT 59911||11/16/2022||To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:?En. Sec. 2, Ch. 451, L. 2009.|| ||NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None|| ||The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. || ||Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage therapist I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider.|| ||If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists. This would certainly not be in

line with improving the efficiency of governmental operations. I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! Sincerely, Chantal Langlois

Please provide your first and last name Chantal Langlois

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Licensing in multiple states becomes very expensive for a practicing professional engineer. It would relieve much of that burden were states to simply recognize and allow professionals licensed in neighboring states with equivalent licensing requirements to practice their profession without additional fees and redundant paperwork. Simple verification of a current license in the neighboring state should suffice.

**Please provide your first and last name** Matthew Beck

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I oppose repeal of 37-33-402 because Massage Therapy is a healthcare profession and deserves that recognition in state law. Declassifying Massage Therapy as health care would prevent insurance coverage for those who require MT after an injury or surgery. It would also send us back to the stone age! We have worked very hard over the last 50yrs to propel the field of MT into the future with licensure, higher education standards, and acknowledgement as a health care profession.

**Please provide your first and last name**

Kaia Van Natta

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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The Department of Labor & Industry -as part of its red tape reduction activities -is a bill draft that repeals medication aide legislation for both nursing homes and assisted living facilities. I am in opposition to repealing medication aides. They are a valuable resource to long term care. The delegation of medication administration duties allows nurses to properly assess and care for individuals in our care.

**Please provide your first and last name**

Jennifer Noble

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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November 10, 2022||Department of Labor & Industry|Business Standards Division|301 South Park Ave.|Helena, MT 59620||Please accept the following comments related to Version 3 of the Title 37 Reform bill. We appreciate the opportunity to comment and the work that went into these proposed changes. If you have any questions related to our comments, please contact Allen Lloyd at Allen@Montana.CPA or 406-442-7301.||Issue #1:|37-50-101. Definitions. (7) Peer Review Definition on page 269.||Proposal reads:|(8)(7) ""Peer review"" means a board-approved study, appraisal, or review of one or more aspects of the attest or compilation work of a licensee of a registered firm in the practice of public accounting, by another licensee or licensees a person or persons who hold licenses in this or another jurisdiction and who are not affiliated with the individual person or firm being reviewed. |Our concern is removing the explicit allowance for licenses from another jurisdiction could cause issues for both the firms being reviewed and the reviewing firms. The current Peer Review Program (PRP) for Montana is administered by the Nevada Society of CPAs. The number of firms in Montana performing peer reviews has shrunk over the past decade and this partnership allows for a PRP that maintains conflict of interest standards. ||Many Montana firms engage a firm from another state to perform their peer review. Retaining the ability for non-Montana firms to peer review Montana firms is critical. Our recommendation would be to retain the other jurisdiction language as follows:|(8)(7) ""Peer review"" means a board-approved study, appraisal, or review of one or more aspects of the attest or compilation work of a licensee of a registered firm in the practice of public accounting, by another licensee or licensees a person or persons who hold licenses in this or another jurisdiction and who are not affiliated with the individual person or firm being reviewed. |Issue #2 |37-50-101. Definitions. (10) Principal place of business Definition on page 270.||Proposal reads:|(10)?"Principal place of business"" means the office location designated by the licensee for the purposes of substantial equivalency. |One of the cornerstones of CPA mobility is the ability for firms to operate across borders, as long as they are actively licensed in their principal place of business. Current law follows the Uniform Accounting Act (UAA) which allows the licensee to designate the office location they use as their principal place of business. The term ""principal place of business"" is also referenced in 37-50-325 sections 1 and 2. ||Striking this definition could cause confusion for firms looking to serve clients in Montana. Without the clear ability to designate their principal place of business, those firms may decline to offer service to Montana entities. Our recommendation would be to retain this definition:|(10)?"Principal place of business"" means the office location designated by the licensee for the purposes of substantial equivalency. |Issue #3|37-50-101. Definitions. (12) Substantial equivalency Definition on page 270.||Proposal reads:|(12)?"Substantial equivalency"" or ""substantially equivalent"" means a determination by the board or its designee that the education, examination, and experience requirements contained in the statutes and rules of another jurisdiction are comparable to or exceed the education, examination, and experience requirements contained in the Uniform Accountancy Act or subsequent acts or that an

individual certified public accountant's education, examination, and experience qualifications are comparable to or exceed the education, examination, and experience requirements contained in the Uniform Accountancy Act. In ascertaining substantial equivalency, the board shall take into account the qualifications without regard to the sequence in which the experience, education, and examination requirements were attained."|Another cornerstone of mobility for CPAs is substantial equivalency. While we recognize our definition of substantial equivalency is lengthy, it is worded in a way to make it easy for licensees in any jurisdiction to easily know how substantial equivalency works. The references to the UAA allow each state to use their own wording and allow licensees from other states to transfer their license without doing a detailed analysis of the exact rules in both states. ||It is also important for the language related to the sequence of attaining the requirements. Some jurisdictions require applicants to obtain their entire 150 hours of education before sitting for the CPA exam. Without this language, licensees may have concerns about moving to Montana if their license would not qualify for substantial equivalency due to their completion of the requirements in a different order. |Our recommendation would be to retain this definition:|(12)?"Substantial equivalency" or "substantially equivalent" means a determination by the board or its designee that the education, examination, and experience requirements contained in the statutes and rules of another jurisdiction are comparable to or exceed the education, examination, and experience requirements contained in the Uniform Accountancy Act or subsequent acts or that an individual certified public accountant's education, examination, and experience qualifications are comparable to or exceed the education, examination, and experience requirements contained in the Uniform Accountancy Act. In ascertaining substantial equivalency, the board shall take into account the qualifications without regard to the sequence in which the experience, education, and examination requirements were attained."|Issue #4||37-50-302. Certified public accountants -- licensure -- qualifications and requirements. Section (1) on page 271||Proposal reads:|(1) is of good moral character have graduated from an accredited college or university with a baccalaureate degree and at least 150 semester credit hours including specific accounting and business credit hours; ||This section removes "good moral character" from the requirements for initial licensure, but 37-50-330. Compliance with ownership requirements -- firm registration. Section (c) on page 274 retains that language as it applies to firm owners. We would propose removing the "good moral character" reference in 37-50-330:|(c) all individuals persons with an ownership interest in the firm are of good moral character and individuals actively participate participating in the business of the firm or its affiliated entities. |Issue #5||37-50-302. Certified public accountants -- licensure -- qualifications and requirements. Section (3) on page 271||Proposal reads:|(3) meets the requirements have two years of education and accounting experience set forth in this chapter and in board rules; and |This change would significantly impact the current requirements for licensure and the ability of licensees from other states to transfer their license to Montana. The rule referenced in this section currently

states: ||24.201.502 ACCOUNTING AND AUDITING EXPERIENCE REQUIREMENTS|(c) takes place in the three years prior to the date of the application; and|(d) includes at least 12 calendar months (2000 hours actual work experience) of private, governmental, academic, or public accounting work acceptable to the board.||Current rule requires 2,000 hours over a time span of at least 12 calendar months but not more than the three years prior to application. Changing to a 2-year standard would double the length of time an applicant would have to wait to submit their application. ||This change would also cascade to create a number of other issues related to license mobility. Most states follow current Montana rules, requiring one year of experience. If this change is made, licensees from states with a one year requirement would not meet substantial equivalency to transfer their license. This would limit the ability of a CPA from certain states to easily relocate to Montana. ||Another impact would be for firm mobility. Currently, firms may practice in Montana if over half the firm is owned by licensed CPAs. If the CPA owners of a firm were licensed in a state with a one year experience requirement, their ownership would be considered non-CPA potentially impacting their ability to practice in Montana. Our recommendation would be to either maintain the current language:||(3) meets the requirements of education and accounting experience set forth in this chapter and in board rules; and |Or change the word two to one:||(3) meets the requirements have one years of education and accounting experience set forth in this chapter and in board rules; and ||Issue #6||37-50-335. Registration of firms - exemptions. Section 3 on page 277||Proposal reads:|(a)(3) offer or render A firm described in subsection (2) that offers or renders attest services and compilations in this state if the firm: |If this section is being amended, it would be beneficial to remove the words ""and compilations"". The UAA and most states do not require firms that do compilation work to meet the ownership and peer review requirements. The proposal would also allow out of state firms to provide compilation services in Montana as long as they meet the requirements of their home state. The impact of this word is increased regulation of Montana firms who provide compilation services. A firm from another state could offer those same services without participating in peer review. ||Our recommendation would be to strike the words ""and compilations"" from the proposal:|(a)(3) offer or render A firm described in subsection (2) that offers or renders attest services and compilations in this state if the firm: ||Issue #7 ||37-50-341. Reciprocal discipline for practice privilege. Section (1) on page 278||Proposal reads:||(1) The board may initiate proceedings under this chapter upon its own motion, upon a complaint made by the board of accountancy of another state, or upon the complaint of a person.|Our concern is this could limit the Board's authority to act in cases where an out of state licensee has action taken by another state's board of accountants. We are also concerned that this removes language allowing the Board itself to initiate proceedings. Our recommendation would be to retain this section:||(1) The board may initiate proceedings under this chapter upon its own motion, upon a complaint made by the board of accountancy of another state, or upon the complaint of a person.||Thank you again for the opportunity to comment. We

appreciate your review of our concerns and welcome any questions or explanations related to our concerns. |

Please provide your first and last name Allen Lloyd

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||Massage is absolutely healthcare!

**Please provide your first and last name**

Lisa Laird

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. As a speech therapist in the medical setting, I firmly believe massage therapy is a vital health care profession.

**Please provide your first and last name** Noel Shaw

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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November 16, 2022|||Department of Labor & Industry|Business Standards Division|301 South Park Ave|Helena, Montana 59620||We appreciate the opportunity to offer comments in advance of the meeting scheduled for this Thursday, November 17, 2022, to discuss efforts within Montana to streamline governmental processes and ensure their efficiency. ||First, a bit of background: The National Association of State Boards of Accountancy (NASBA), which was founded in 1908:||1. Represents Boards of Accountancy from 55 states and territories of the U.S. ||2. Works with the American Institute of Certified Public Accountants ("AICPA" - the professional accounting association with more than 400,000 members in 143 countries) to regularly update the Uniform Accountancy Act and the accompanying rules, both of which have served as the basis for accountancy laws and regulations across the United States since 1984. ||3. Manages, in cooperation with the AICPA, the operation of the Uniform CPA Exam, which is administered to more than 170,000 candidates throughout the world each year. ||4. Serves as the main contact for State Boards of Accountancy with the IRS, SEC, PCAOB, the Government Accounting Office, and the various national accounting standards boards. ||As part of this last item, NASBA supports the Montana Board of Public Accountants in its mission to protect the public by setting the regulatory requirements for obtaining a license to practice public accountancy. One critical way the Montana Board accomplishes this is by ensuring that the education, examination, and experience requirements are met by all candidates before a license is awarded in Montana. Such work takes place in tandem with the standards established by the Uniform Accountancy Act (UAA), the chief benefit of which is to establish uniformity in how the profession is regulated in all 55 State Boards of Accountancy across the United States, thereby allowing not only a high standard of professional practice and public protection, but also an ease of mobility across all jurisdictions.||As part of its work, the Montana Board will also renew an individual licensee's permit to practice public accountancy after determining that individual has completed the required hours of continuing professional education that proves his or her knowledge remains current in a rapidly changing field. For a CPA firm to maintain its permit to practice, it must undergo a peer review to determine compliance with technical standards, submit to a review of its system of quality control over its attest practice, and provide a report testifying to successfully passing such a review to the Board. Alongside these protective measures, should there ever be a complaint about the performance of an individual CPA or a firm, be in technical or ethical, the Board will investigate, and hold a formal hearing or negotiate a settlement that may result in suspension, probation, reprimand, and even revocation-with civil penalties as set forth by Statutes. The Board also has the authority to impose remediation as a means to correct a problem. ||Only State Boards of Accountancy can revoke an individual's right to practice public accountancy. This regulatory authority is reserved to the states. On the federal level, the Sarbanes-Oxley Act of 2002 created the Public Company Accounting Oversight Board (PCAOB) to monitor auditors of companies that register with the Securities and Exchange Commission. But what about those many private companies that make up the larger

percentage of the American economy and Montana's? They especially depend on the State Board to effectively regulate CPAs. In fact, even if the SEC were to ban a CPA from practice before the Commission, it would remain up to the State Board to revoke that CPA's ability to practice public accountancy. Over the years, other Boards of Accountancy have encountered a wide variety of changes to their operation, including reorganization. In December 2010, the State of Washington considered merging its Accountancy Board within a larger department, but first sought an independent consultant's study. The consulting firm released its report which stated: "Our analysis indicates that, as to efficacy and economy of operating the Washington Board of Accountancy (WBOA), there are no significant reasons to warrant a merger of the WBOA into the Washington State Department of Licensing... Given that the stated reason for the creation and existence of the WBOA is to promote the dependability of financial information and to protect the public interest, a reduction in the accountability of WBOA to the public and the profession would be a failure of WBOA's statutory purpose." A similar finding is discussed in the "Report of the Advisory Committee on the Auditing Profession," issued in October 2008 by the U.S. Department of Treasury (ACAP Report). It "urged the states to create greater financial and operational independence of their state boards of accountancy." The report cited a concern "about the financial and operational independence of state boards of accountancy from outside influences, such as other state agencies, and the possible effect on the regulation and oversight of the accounting profession." It addressed the merging of Boards by warning that "a number of state boards are under-funded and lack the wherewithal to incur the cost of investigations leading to enforcement. In addition, some state boards fall under the centralized administrative 'umbrella' of other state agencies and lack control of financial resources and/or operational independence necessary to carry out their mandate of public protection." In coming to a decision in Montana, it is important to keep in mind the CPA profession is unique in its accountability to third parties. Because individuals, businesses, and governments (federal, state and local) all depend upon rigorous and reliable audited financial information in order to make sound investing, financial planning, and lending decisions, in compliance with applicable federal, state and local laws-and because the body of knowledge used by CPAs is so highly technical and comprehensive, as are the accountancy statutes and regulations that govern them-enforcement cases require Board staff and members who possess a significant level of education, up-to-date professional knowledge, and experience. The impartial, professional, and technical knowledge that the Montana Board of Public Accountants members have contributed to the protection of the citizens of Montana could not be afforded through any other combined agency. NASBA recognizes and applauds your goal of finding the proper balance between public protection and governmental efficiency. Procompetitive benefits and efficiencies are key factors when regulating any profession. The 55 state boards of accountancy around the nation have worked diligently with NASBA to reduce barriers to trade in accountancy services. Beginning in 1997, the state boards, NASBA, and

the AICPA embarked upon a national legislative effort to remove impediments to interstate practice, ease restrictions on firm ownership, lift anticompetitive limits on fee arrangements, and permit the use of trade names. Concurrently, NASBA and the AICPA developed and promoted these changes through the Uniform Accountancy Act ("UAA"), an evergreen model law developed to provide a comprehensive, uniform approach to regulation of the accounting profession. As stated in the "Introductory Comments" to the UAA 8th Edition: "these changes achieve the goals of enhancing public protection, facilitating consumer choice, and supporting the efficient operation of the capital markets." In the past two decades, these procompetitive changes have been adopted in almost all U.S. jurisdictions where accountancy is regulated and has led to CPA Mobility. In a 2018 policy paper released by the Federal Trade Commission (FTC), Options to Enhance Occupational License Portability, the FTC recognized the accounting profession for utilizing model laws to achieve an interstate practice system. These laws gave the state granting practice privileges and the state granting the original license oversight over the licensee. At NASBA's 111th Annual Meeting, Tara Isa Koslov, chief of staff to the Chairman of the FTC stated, "We recognize accountancy as having done mobility and accountability right." Koslov also noted: "Importantly, you are providing disciplinary support beyond state lines." The UAA serves as a model for states and professional licensing so long as Boards operate within their statutory authorization. As a result of these efforts, the regulation of accountancy among the states is uniquely efficient and procompetitive. Other examples, under the UAA, as implemented by state laws, include:

- CPAs only need to be licensed in the state of their principal place of business. UAA §§ 3(p), 23.
- CPAs can practice in another jurisdiction without having to obtain a license or provide notice or pay a fee. UAA § 23.
- CPAs are subject to substantially equivalent licensing requirements. UAA § 6(c)(2).
- All 55 U.S. Jurisdictions have adopted "Substantial Equivalency" as set forth in UAA § 3 and 23. As a result, because the initial licensure requirements are identical in all 55 jurisdictions (Education, Examination and Experience), when a CPA licensee moves his or her principal place of business to a new jurisdiction, the reciprocal licensing process is minimal.
- Holders of substantially equivalent foreign credentials are allowed to provide certain services in the states. UAA § 14(j).
- For those CPAs who hold licensure in multiple jurisdictions, the reporting of Continuing Education is only required to be reported in the licensee's principal place of business (home jurisdiction) - as determined by the licensee. UAA Model Rule § 6-4(a) and 6-5(c).
- Non-licensees are allowed to render many accounting services to the public. UAA § 14(a).

At a time when Montana is taking steps to have a leaner, more effective government, it must be stated that a central part of effectiveness is trustworthiness and reliability. Confidence in professional financial services positively impacts the economy and is in the public interest. The Montana State Board of Accountancy is committed to the protection of the public and its direct accountability to the public should be preserved so both the perception and reality of independent, professional oversight remains. We are pleased to assist you and your staff in any

plausible manner in supporting the Montana Board of Public Accountants' independent effectiveness. ||Sincerely,|| |Ken L. Bishop |NASBA President & CEO||cc: Dan Vuckovich, CPA/ABV/CFF| Allen Lloyd, CEO, Montana Society of CPAs||Appendix A - NASBA's Comments to Version 4 Title 37 Reform Draft (Page 5-7)||Appendix A||Issue #1|Section 37-1-101, Duties of department is amended to read on Page 20. |Proposal reads:|37-1-101. Duties of department. (1) In addition to the provisions of 2-15-121, and other duties expressed in this chapter or chapter of a board or program, the department shall: (1) establish and provide all the administrative, fiscal, inspection, investigative, and legal,.... ||The National Association of State Boards of Accountancy (NASBA) concern is this change appears to replace the Board's authority to investigate complaints when scope of practice issues is alleged. Furthermore, if the Department is unable to timely investigate accountancy complaints, and if not investigated by an individual with technical knowledge of the profession, this could put CPA mobility in question with another jurisdiction. ||Our recommendation would be to strike the word ""investigative"" and replace with ""non-scope of practice investigations"" from the proposal:|37-1-101. Duties of department. (1) In addition to the provisions of 2-15-121, and other duties expressed in this chapter or chapter of a board or program, the department shall: (1) establish and provide all the administrative, fiscal, inspection, investigative non-scope of practice investigations, and legal,.... ||Issue #2|37-50-101. Definitions. (7) Peer Review Definition on page 264. |Proposal reads:|(8)(7) ""Peer review"" means a board-approved study, appraisal, or review of one or more aspects of the attest or compilation work of a licensee of a registered firm in the practice of public accounting, by another licensee or licensees a person or persons who hold licenses in this or another jurisdiction and who are not affiliated with the individual person or firm being reviewed. ||NASBA supports the concerns submitted by Montana Society of CPAs and their proposed language (See Attached). ||Issue #3|37-50-101. Definitions. (10) Principal place of business Definition on page 265. |Proposal reads:|(10)?"Principal place of business"" means the office location designated by the licensee for the purposes of substantial equivalency. ||NASBA supports the concerns submitted by Montana Society of CPAs and their proposed language (See Attached). In addition to CPA Mobility, the removal of ""Principal place of business"" would prevent Montana licensees, who maintain licensure in multiple jurisdictions, from only having to report their Continuing Professional Education (CPE) where they have designated as their Principal Place of Business. ||Issue #4|37-50-101. Definitions. (12) Substantial equivalency Definition on page 265. |Proposal reads:|(12)?"Substantial equivalency"" or ""substantially equivalent"" means a determination by the board or its designee that the education, examination, and experience requirements contained in the statutes and rules of another jurisdiction are comparable to or exceed the education, examination, and experience requirements contained in the Uniform Accountancy Act or subsequent acts or that an individual certified public accountant's education, examination, and experience qualifications are comparable to or exceed the education, examination, and experience requirements contained in the Uniform Accountancy Act. In ascertaining

substantial equivalency, the board shall take into account the qualifications without regard to the sequence in which the experience, education, and examination requirements were attained."||NASBA supports the concerns submitted by Montana Society of CPAs and their proposed language (See Attached). It should be noted that all 55 jurisdictions, where Accountancy is regulated in the United States, have adopted the same definition of "Substantial Equivalency" in their statutes. |||||Issue #5|37-50-302. Certified public accountants -- licensure -- qualifications and requirements. Section (3) on page 267.||Proposal reads:|(3) meets the requirements have two years of education and accounting experience set forth in this chapter and in board rules; and ||NASBA supports the concerns submitted by Montana Society of CPAs and their proposed language (See Attached).||Issue #6|37-50-335. Registration of firms - exemptions. Section 3 on page 271||Proposal reads:|(a)(3) offer or render A firm described in subsection (2) that offers or renders attest services and compilations in this state if the firm: ||NASBA supports the concerns submitted by Montana Society of CPAs and their proposed language (See Attached).||Issue #7| 37-50-341. Reciprocal discipline for practice privilege. Section (1) on page 273.||Proposal reads:|(1) The board may initiate proceedings under this chapter upon its own motion, upon a complaint made by the board of accountancy of another state, or upon the complaint of a person.||NASBA supports the concerns submitted by Montana Society of CPAs and their proposed language (See Attached). In addition, the removal of this language could not only put the public at harm, but also put CPA Mobility in question with other jurisdictions if the enforcement of complaints in Montana are not timely investigated - and not investigated by subject matter experts when it comes to scope of practice issues. ||

Please provide your first and last name John Johnson

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Cody Osborne

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233038  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This repeal of Medication Aides would make staffing in ALFs and other long term care facilities worse than it already is...bad idea for healthcare in Montana

**Please provide your first and last name**

Guy Hayter

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233039  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Nursing Resource to SNFs located in rural Montana

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The proposed action to remove certified medication aides from credible staff utilized in long term care facilities will have a devastating effect on the buildings whom care for the states elders and infirmed populations. Medication techs allow for the licensed nurses to concert their efforts on assessment and analytics while extending oversite to the medication aides. Additionally in the staffing crisis that faces Montana and the US , employing med techs allows for fewer nurses on the floor, typically needed for passing medication , and again have the opportunity for the nurses who are present to not utilize their time dispensing medication but instead assessing, analyzing, communicating with mds and families, when the nurses have time to only pass their medications, the previously mentioned tends to wain, hence some of the egregious deficiencies issued more frequently in MT. Removing this very necessary position would lend to furthering the staffing crisis seen in MT and ultimately effect those we steward. It is of no consequence to legislators to keep these positions in place as they historically have less medication errors than nurses because their scope is small and they don't have to multi task the same way a licensed nurse has to, as they don't follow up with mds, or assess, or document , nothing other than medication administration. As support to these providers, I respectfully ask to continue the use of medication aides/techs.

**Please provide your first and last name** erin thomas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233040  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Section 2 Medical Board Changes 2-15-1731 | (3) C - Delete Podiatrist -not a medical doctor.| D - Delete Physician Assistant - not a medical doctor, but an extender, to work directly under the supervision of a medical doctor, performing duties after the patient has be examined and diagnosed by a medical doctor. Using PA/NP in free-standing clinics and solo ER shifts is akin to leaving a 12-year-old babysitter in charge while the parents go backpacking for a week in YNP without phone coverage. Allowing PA/NP to practice medicine is an extreme economic decision that is sometimes necessary in third world countries, not in Montana.| E- Delete two public members - they have no concept of the medical training of physicians, of medicine itself, they cannot recognize sub-standard care and their vote only adds confusion to what can only be decided with clarity by medical doctors.|| Add that board members need to be practicing physicians or retired for a maximum of 1 year. (Your ideal board members are physicians who are too busy to serve.)|Thank you for the opportunity to comment!|Section 4 - Definitions 37-3-102|(11) Practice of Medicine: Can only be performed by a physician.| |

**Please provide your first and last name** Camillyn Weber

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233041  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. ||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||I work with MDs, DO's, DC's, ND's, PT's, and other health care professionals who refer patients to me and trust that I am a competent memeber of the health care team. ||Let's not go backwards by reducing the requirements a LMT must meet and maintain. Let's not demote the profession of massage therapy, making it impossible for patients to use healthcare benefits to access this essential part of healthcare. Let's not trivialize this profession by lumping it in with a completely unrelated field.||Therapeutic massage is an important part of healthcare. Demoting our profession is akin to claiming that the muscles, connective tissue and skin are not an important part of the human body. ||Thank you for your time and careful consideration of these points.

**Please provide your first and last name** Courtney Jackson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233042  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a current Board Member of the Clinical Laboratory Science Practitioner's Board, however, I am solely commenting as a currently licensed laboratory professional on my own behalf. ||My comments refer to Ver. 1 - 10-27-2022 - CLS Board to Program. ||I want to impress upon the reviewers of these comments how important having this board remain a board is. Clinical laboratory science is an extremely important profession with a massive amount of access to protected and private information as well as providing highly technical, clinical data used in the treatment of patients. Maintaining this board is imperative to protect the integrity of educational recognition to ensure the highest level of technical care from a laboratory standpoint. ||Review of complaints is another extremely important function of this board. These complaints need to be reviewed by specialists in the area to again ensure the highest quality of care from a laboratory standpoint. ||I'd also like you all to know that there is a trend or evolutions happening nationwide moving toward state level review/approval of certain aspect pertaining to acquiring, maintaining and regulating licensing. Over the past ten years or so, the number of states overseeing licensure of Clinical Laboratory Scientists/Specialists has increased from 2 to 13 with more states considering this improvement in their states.

**Please provide your first and last name** Matthew Aakre

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233043  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name**

Claire Hodgskiss

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233044  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Version 1 Repeal of Medication Aides|I feel that repealing this would have serious impacts on the quality of care that our Seniors are receiving. Medication Aides allow nursing staff both RN and LPN to focus their time on assessing and managing a resident's health and overall well being. By not having the burden of managing regularly scheduled medications such as stool softeners and ibuprofen the nurse can focus more on nursing tasks such as wound care, pain assessments, fall intervention and quality improvement. In addition to this the Medication aide provides a career path, and increase in pay to encourage more CNA's and care givers to consider going into nursing as a final profession. We all know what a nurse shortage there is and this would be another nail in the coffin for our struggling long term care and assisted living facilities. This would cause a huge hit to our budgets as well forcing us to utilize more nurses which currently do not exist or only through a very expensive travel nurse pool which often times can add to substandard care being provided. PLEASE do not do this. Many times our medication aides are so in tune to the residents that they can identify problems before the nursing staff can. They are a VITAL piece of our care teams.

**Please provide your first and last name** Bernice Zimmermann

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233045  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hello there, |From Page 384 of Title 37 Reform, Ver. 4: Please remove 37-33-402 from Title 37 Reform, Section 216 that repeals the statue! I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves resignation in the state law and communities of Montana. As a new LMT here in Montana, I have greatly witnessed the importance this practice holds for individuals in residing communities in such a short time. Not only does this bridge a gap for masking sex work under the name of massage therapy, it also minimizes the value of the work we do with citizens every single day. Massage therapy has a wide range of modalities that are treating people with: mental illnesses, chronic pain, physical injuries, chronic stress, sports rehabilitation/maintenance, end of life care, and so much more. Please do not remove such an incredibly valuable branch of healthcare designation away from this state. |With peace and wellness, |Anya Wolf, LMT

**Please provide your first and last name** Anya Wolf

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233046  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Licensure is the only way to ensure a qualified workforce of professionals, who are tasked with making life or death decisions every day. Voluntary certification would diminish quality and professionalism of the of Clinical Laboratory Scientist profession and have a detrimental effect on patient care and safety in the State of Montana. I strongly urge continuation of the Board as is. This is an attempt to sneak Right to Work agendas into Montana, which will decrease wages, workforce quality, and undermine labor rights.

**Please provide your first and last name**

Cathryn Watt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233047  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Healthcare Facility Leader

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events,, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Samantha Spencer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233048  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. To repeal 37-33-402 is counter productive of its objective to "eliminate excessive, outdated and unnecessary regulations which cause economic harm of people and businesses". Research findings indicate that integrating massage therapy into ongoing care has a positive outcome for patients and in many cases LOWERS healthcare costs. By repealing initiative 37-33-402 you are removing Massage Therapy from the healthcare industry therefore limiting patient choice and in fact contributing the the "economic harm" you claim to be trying to eradicate. Further more Massage Therapy's role in integrative healthcare has become widely accepted in major hospitals and in daily medical practice. A wealth of research and fact based studies has shown the positive impact of Massage Therapy for pain management and relief, psychological and pathological conditions and the overall benefit in the field of healthcare. If any red tape should be "cut" in regards to economic harm to people and businesses, it would be tearing down the wall patients encounter with insurance companies for covering Massage regardless if a physician has prescribed such treatments. Please reconsider your decision in the matter. Jessica Erler LMT, NMT

**Please provide your first and last name** Jessica Erler

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233049  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I do not understand why the Independent Contractor Exemption (for Worker's compensation insurance) requires a notarized signature. I even question the need for an IC exemption as an anesthesia provider reimbursed via 1099. I know I cannot make a workman's comp claim, and I don't care. I have health insurance. I don't know if workman's comp applies to me as I have no employees. I have been renewing my IC Exemption every few years for a very long time. I find it burdensome that I have to pay \$125 to not participate in something. Also, my signature has been on file for a very long time, I submit no new documents since the initial ones still apply, yet I am required to find a notary for my application to be valid (it was just returned). I sign lots of important documents in life and almost none of them require a notary. Perhaps there is a case to be made upon initial application, but requiring this on each renewal is burdensome and unnecessary. Obviously this process has been streamlined a bit, since new documents are not required to be submitted upon each renewal. Please remove the notary requirement on the IC Exemption Renewal form.

**Please provide your first and last name** Daniel Mattson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233050  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.||I've seen several massage therapist for years. They have improved my health and well being for years. They are health care professionals and deserve this recognition in the State law.

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**Please provide your first and last name** Maria Helterline

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233052  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.||I'm a high school student and I see a rolfer and he is incredible and he is a healthcare professional!!

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**Please provide your first and last name** alexis helterline

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233053  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I've seen massage therapists and rollers and they are healthcare professionals.

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**Please provide your first and last name** Dan Helterline

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233054  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

message therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Heidi Ransom

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233055  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Repeal Medication Aides - We currently use medication aides in both our assisted living and skilled nursing programs. Utilizing med aides to pass medications has freed up our licensed nurses to provide other tasks within the nursing scope of practice. In our experience medication aides are very thorough and in most cases, have fewer medication errors than their licensed nurse counterparts as they are able to focus on the task of medications and not be distracted by so many other duties. ||In an environment where it is hard to find both CNA and Nursing staff, this gives us another avenue for filling staff positions. It is a great career path for CNA's to be able to move up the career ladder without committing to a nursing program.||We currently start CNA's at \$18 an hour and Medication Aides at \$20 an hour. LPN's start at \$25 an hour. By having med aides pass the medications, we can hire more RN's that have a higher level of education and scope of practice to do the clinical functions and assessments needed by those we serve. ||It would be a huge disservice for you to do away with this job category for our industry. We are already struggling in many ways and this would be another area that would cause us increased hardship.

**Please provide your first and last name** Carla Wilton

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233056  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I fully support the state's suggestion to move the CLS Board to a Program

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**Please provide your first and last name** Shannon Walden

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233057  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|I was in a serious car accident. Throughout my 5 surgeries massage therapy played an intricate part in my recovery. I don't feel that I would have recovered as well without it.

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**Please provide your first and last name** Deborah Garcia

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233058  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The following is in regard to the use of Certified Medication Assistants. Certified Med Aides are crucial and integral part of long term care, especially with the nursing shortage we are currently facing. CMAs have the capability of providing major support to nurses on the floors and are an extra set of hands for both CNAs and Nurses respectively. They have to pass a course and take an exam in order to be qualified to pass medications, but they relieve the nurses of having to be tied to a cart and allows the nurses to perform nursing assessments, evaluations and provide nursing cares. Having CMAs as a part of the team allows nursing facilities to staff members of the community (especially in rural areas) who don't have the opportunity or ability to attend 2-4 years of college to obtain nursing licenses and still give our foundational CNA staff the opportunity to expand from their current positions and gain further education in the world of long term care. CMAs also have a leg up on their peers if and when they do seek further education because they already have an in-depth understanding of long term care pharmacology and understand a lot about the nursing processes. Within our facility, CMAs are the secondary set of eyes for our nurses and they are foundational to providing high quality nursing care. They are crucial to maintaining adequate staffing within LTC facilities especially during a time when nurses are very hard to come by in general, and when they are trained appropriately and exhibit competence in their role, they are absolutely wonderful assets to the nursing team and help facilities meet resident needs in a timely and safe manner.

**Please provide your first and last name** Wes Thompson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233059  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

1. New section 4 pg. 10 4b(i) - Why would radiology technologists should be included to be screened for a criminal record|2. 37-14-306 pg 152 Limited radiology technician language - propose changing to Limited X-ray Machine Operator (LXMO) for radiologic technology industry consistency. American Society of Radiologic Technologists (ASRT) oversees and develops practice standards for Radiologic Technology modalities|3. 37-14-306 pg 154 - Remove #4- hardship language - there are many online programs for education and training for LXMO and Radiologic Technologists|4. 37-14-313 pg. 155 #2 -language consistency - change technician to technologist

**Please provide your first and last name** Jerri Doyle

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233060  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

We oppose the bill draft that repeals medication aide legislation for both nursing homes and assisted living facilities. The MHCA worked very hard to get this legislation passed a number of years ago. We wanted to clarify in law that properly trained individuals can pass meds in our facilities. ||We use licensed med aides in our facility very successfully and find them helpful. We believe it would be a big step backward to lose this category of direct care worker - for the workers, for the facilities and for the residents.||Repeal of this law would likely mean that we would be restricted from using this level of worker because the board of nursing believes this is a nursing task under the nurse practice act.||There continues to be a shortage of nursing staff and licensed nurses. There isn't even enough slots for individuals to participate in such academic programs. We need to be able to continue to have med aides and for them to be able to pass meds.||It has been our approach to continue to recruit for them and promote our sponsored med aide training program for current and prospective CNAs. ||Thank you. |

**Please provide your first and last name** Rebecca Timis

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233061  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute.|| |As a Licensed Massage Therapist it is important to continue to be listed as a Health Care Professional so that we can bill insurance and offer this service to those in need.

**Please provide your first and last name** Carol Lesser

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233062  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I have been a massage therapist in Bozeman since 2006. My experience began at a chiropractor's office, then Bozeman Deaconess hospital for 3 years before starting a private, then group practice with other health care professionals for the last 12 years. Needless to say, I have seen how massage can benefit the health of people in many ways. Massage should not be compared to the beauty industry. You do not leave a massage treatment with the intentions of looking different. Massage treats the body's internal biochemistry through the blood and lymph systems, musculoskeletal and fascial systems and can go deeper into the viscera treating specific organs as well as the whole nervous system. I have personally helped thousands of people recover from injuries and accidents, avoid surgeries, change tension patterns that lead to chronic conditions such as headaches, frozen shoulder, plantar fascia, and many over-use injuries that several other health care providers were not able to successfully treat. Our western allopathic medicine can be a disservice to people who do not benefit from a quick-fix or a masking of symptoms through pharmaceutical pain relief or injections. Massage is one of the few modalities that uses simple & supportive manual techniques that are tailored to the individual's needs with time and care to heal the body, rather than manage symptoms. If massage is no longer considered a healthcare profession, it will devalue the integrity of the industry. My intention has always been to 'bridge the gap' in healthcare and has been challenged in legitimacy with insurance and our system. Taking away the way in which licensure is seen will further perpetuate the gap in holistic healthcare available to clients. I do not see any way that changing the profession of massage would benefit our industry or healthcare in any way. Please consider matter this closely as it will effect the industry, many careers, and many more who receive benefits from massage in supporting their health.

**Please provide your first and last name** Katie Cook-Bretson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233063  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||For 19 years I have been working with clients to reduce muscular pain and tension, increase range of motion, and increase lymphatic return. I have worked with clients to feel less muscular pain and tension, headache frequency/duration, for athletes and blue collar workers (construction, kitchen worker, etc). I have worked with clients who are recovering from surgery, TBI, concussions, and pain of loss (spouse death). I worked in Palliative Care at Bozeman Deaconess Hospital for 10 years and three years with weekly massage for Hospice patients. Most of the time they reported pain reduction, feelings of wholeness, and improved spirit/vitality.

**Please provide your first and last name** Elizabeth Allen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233064  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Working as a Chiropractor I deal with the complications of soft tissue injuries on a daily basis. Without the supporting soft tissues the skeletal structure has no support. Having trained and licensed professionals that specializes in these types of issues is an important asset. Having the skills to address everything from lymphatic drainage to repetitive use injuries is an important tool to have in our health care system and should not be minimized.

**Please provide your first and last name** Tommy Warden

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233065  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To Whom It May Concern, Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|| oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I've been doing Therapeutic Massage for 22 years. My business accepts claims for Motor Vehicle Accidents with a physician's prescription. Beneficial Neuromuscular therapy relieves up to 100 trigger points (nerve within the muscle) resulting in pain cessation. No other profession offers the God-given gift of therapeutic touch. Therefore, please keep our massage industry under the Healthcare status. Thank you for your help in keeping the massage profession a viable healthcare industry.

**Please provide your first and last name** Donna Podolak

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233066  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

||To the Red Tape initiative,||Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|| oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our massage therapy community's concerns noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. |37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||(2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.|History:?En. Sec. 2, Ch. 451, L. 2009. | |NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Downgrading massage therapist as non-medical healthcare professionals also limits choices for healthcare made by patients. Massage therapy is imbedded throughout our healthcare industry as an effective modality to address and treat with a non-pharmacological option for pain management, anxiety, depression, lymphedema and end of life care. The list could go on and on. Proper training and licensing through a healthcare lens is necessary for safety and professional integrity and ethics. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from other healthcare professionals and limit insurance reimbursement. Professional credibility of Montana massage therapist could then be viewed by massage providers and healthcare workers in other states as inferior by title and Montana state law description. | |Nationwide massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage therapist and licensed physical

therapist assistant I can tell you that LMT's receive advanced training that legitimize them as true "Healthcare Professionals" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | |If the state does not strike 37-33-402 from Section 216 repeal list, I am certain there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists and referring healthcare community. This would certainly not be in line with improving the efficiency of governmental operations. | |I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! | |Sincerely,||Loretta Merriman LMT, PTA|||

Please provide your first and last name Loretta Merriman

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233067  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To: Montana Department of Labor and Industry (MDLI)||From: Brian Huso, MT LTC Administrator||Re: Public comment on Version 1 - 10/3/2022 ""Repeal of Medication Aides""||Date: 11/15/2022||Please indulge me to provide a brief history of my involvement in this issue.||In an effort to address the nursing shortage of the early and mid 2000's time frame and provide relief and solutions to the LTC facilities in MT, the Montana Health Care Association (MHCA) (of which I was a Board member) began the process of introducing legislation as many other states had done to provide for Medication Aides.||In 2009 the MHCA began the process to introduce legislation to address this issue. When it was brought forward it was proposed that the MT Department of Health and Human Services conduct a study during the next biennium to reach out to other states that have used Medication aides to see what the benefits and risk were. After the 2-year study the Departments conclusion was that it was of benefit to the LTC facilities that use them and that the actual Medication error rate was lower than that of licensed nurses in those states that kept track of that data. ||As a result of this 2-year study legislation was introduced in the 2011 MT Legislative session as House Bill 377 to provide rule making language to allow Medication Aides to provide medications in a safe manner in Assisted Living and Skilled Nursing Facilities in MT. |Question: Why would the MDLI endeavor to repeal something that the MT Department of Health and Human Services concluded was beneficial to the LTC and ALFs of MT?||On 3/25/2011, HB 377 passed in its 3rd House reading by a vote of 91 Yea and 6 Nays. On 4/13/2011, it passed on the 3rd Senate reading by a vote 47 Yea and 7 Nay. |Question: why would the MDLI again endeavor to repeal something that the MT legislature thought was very important to the LTC industry of MT as evident by the voting margin.||In 2011 I was an integral part in getting HB 377 introduced and passed. I testified at all of the committee meetings and contacted many legislators regarding this bill and what it meant to all of the Montana LTC and ALF facilities. I brought facility staff to Helena to testify at legislative committee hearing as to its benefits.||As a licensed LTC Administrator in MT I currently have 2 medication aides in my facility, I wish I had 3 more. These Med Aides take a tremendous burden off of the LPN or RN by being able to pass the bulk of the routine medications that are so very time consuming to pass. This allows the Licensed nurses to have the time to provide skilled nursing services to the residents rather than just ""passing pills"". It also allows them the time to properly conduct their assessments of the LTC residents as require by CMS and Federal regulations.||The examination that the potential Med Aid candidate must take is approved by and overseen by the MT Brd. of Nursing.|Question: Why would the MDLI try to repeal something that the MT Brd. of Nursing decided was a valuable asset to the states nursing program?||As I read the changes that you are proposing I am baffled as to why this would even be considered. From the data I was given there are currently 23 ""Medications Aide I"" for ALF's and 142 ""Medication Aide II"" for SNFs in the state of Montana. The annual renewal cost of a Med Aide I and Med Aide II is approximately \$20 per year. This is an annual revenue stream of \$3300 for the MDLI or for the state or a state board, I am not sure who gets the money for this but the

state does in some way. While this may not be a significant revenue stream compared to other professional licensing fees it is not pocket change either and needs to be counted toward a Medication Aide License renewal fee cost recovery. I would venture to guess that this fee more than covers the Dep actual cost of annual license renewal, if it does not, why doesn't the MDLI raise the rates to cover the costs? ||The Long-term Care Industry across the United States and especially in Montana is probably in the worst crisis it has ever been in. In the middle of this crisis the MDLI is attempting to eliminate a very important asset to each LTC facility that is using Medication aides. In the facilities that use them, mine included they are helping provide ""licensed"" and safe medication delivery to residents of LTC facilities. At a time when license nurses are extremely hard to recruit because of the full healthcare spectrum demand for their professional services, coupled with the extremely poor Medicaid rates that the state of Montana pays the states LTC facilities that does not allow us to compete with the hospitals for the same people, Medication Aides are an absolute ""God Send"" to those LTC and ALF facilities that use them.||You are proposing your ""Repeal of Medication Aides"" under the auspicious of the ""Governors Red Tape Relief Initiative"". You have however failed to provide any argument, justification, data, or cost analysis to prove that your proposed changes meet the intent of the Governor's Initiative of: "".....identifying excessive, outdated, and unnecessary regulations."" You have also failed to provide the following:|1. How much ""Red Tape"" is involved in the Medication Aide process versus any other licensee application or annual renewal.|2. Why this so called ""Red Tape"" for the medication aides is a burden to the department of Labor and Industry and thus must be repealed.|3. Any effort on the Department side to find a solution to reduce any burden of ""Red Tape"" for the licensing of Medication Aides other than to repeal them.|4. Any cost justification or data for this entire proposed change.||As I ponder these proposed changes, I am left with perhaps three conclusions:|1. The Montana Department of Labor and Industry has no knowledge of this issue, the extreme value and benefit to the LTC residents that Med Aides are, or what the Med Aides mean to the survival of the LTC facilities that use them. I/we would be more than glad to provide the insight, knowledge and data to show the reality of this issue. |2. The Montana Department of Labor of Industry has an extremely limited and perhaps incorrect knowledge of what the Medication Aides do for the facilities that use them and hopefully would be willing to listen.|3. The Montana Department Labor and Industry doesn't really understand the value of Medication Aides to each LTC facility that uses them, and in a blatant attempt to harass and eliminate LTC in the state of Montana, just doesn't give a ""Rats Rear End"" about it or what it does to the facilities that use them. ||Which of these three conclusions is right? I guess it is for the Montana Department of Labor and Industry, the people of Montana, and/or the Montana Legislature to decide.||I challenge the Montana Department of Labor and Industry to logically defend this action to prove that it is in the best interest of all parties involved and truly meets the Governor's initiative intent of "".....identifying excessive, outdated, and unnecessary regulations."" ||I also personally challenge anyone from the

Montana Department of Labor and Industry to debate this issue with me regarding these proposed changes in a public form. ||Thank you for allowing me to voice my comments and concerns. |

Please provide your first and last name Brian Huso

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233068  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. Here are a few reasons I don't agree with this initiative:|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession.|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers comp.|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied. |Please consider how this initiative is going to effect already licensed and working massage therapists in the state. We need our license and credentials to be taken seriously as healthcare professionals.

**Please provide your first and last name** Autumn Patterson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233069  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have been notified of the agenda to eliminate Medication Aids in Long term care. We have been very vocal with our staffing needs. Montana is 5,000 nurses short at this time. Pushing this agenda forward will remove 165 Long term care workers from nursing homes putting a further gap in staffing. We use Medication Aides to extend the nurses at our facility. This agenda is not helping us care for the most vulnerable in our communities. Please consider Keeping the Medication Aide for the wellbeing of the seniors we care for.

**Please provide your first and last name**

kimberly Gordon

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233070  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|This is opening more doors for human traffickers. It will make it more dangerous for massage therapists! WE ARE NOT ALULT ENTERTAINERS!!!!!! WE ARE LISENSED MASSAGE THEREPISTES!!!

**Please provide your first and last name**

Sheila Hendrickson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233071  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please keep massage therapy classified as healthcare.

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**Please provide your first and last name** Diana Martinez-Yost LMT

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233072  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

||Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||

**Please provide your first and last name**

Diana Martinez-Yost LMT

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233073  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.| |Why is this important?|1. If we are no longer considered a healthcare profession,|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession|2. The state can combine our board with the cosmetology board|3. Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|4. The state can refuse to allow massage therapy reimbursement for workers comp|5. Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|6. It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.|7. It may reduce our client base as we will no longer be subject to HIPAA which provides clients with a sense of personal safety and privacy, just like in any other healthcare setting.|8. Removing it will de-legitimize the expertise and medical applicability that many massage therapists have spent countless hours and funds to learn in order to provide legitimate healthcare.

**Please provide your first and last name** Megan Biggs

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233074  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose the repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I am a massage therapist who owns and operates a private practice in Bozeman, MT. No longer considering massage as part of a healthcare profession is going to make it so people who need massage for healthcare may no longer be able to access it. Medical professional may no longer be able to regularly refer to massage therapy because of the potential liability involved. I have clients who have a prescription for massage from their doctor but if this legislation goes through may not be able to get the care they need as insurance companies would have more grounds to refuse payment for massage therapy. I am also concerned that my colleagues in medical settings (chiropractor, hospitals, medical clinics etc.) will be negatively affected as reimbursement for their services may be denied. Cutting red tape may at times be appropriate, but it is not universally "good business." Many of us in the field of massage therapy are very concerned with the ramifications of the repeal and don't see how it is going to benefit us or our clients in any way.

**Please provide your first and last name** Rachel Esbjornson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233075  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. We partner with other healthcare professionals (chiropractors, physical therapy, etc.) and are working towards a future where we can accept insurance claims to further assist people. Without the distinction of being in the healthcare industry, we will lose the ability to work with the other professionals. This would be detrimental to the clients that see us for clinical work. More than half of the work we do is clinical (meaning it is for the purpose of treating pain). Losing the healthcare title would diminish our professional reputation and open us up to more safety concerns with sex trafficking. We NEED regulation as part of the healthcare field, or there will be disastrous results!

**Please provide your first and last name**

Keri Kingland

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233076  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To Whom It May  
Concern: <https://boards.bsd.dli.mt.gov/Title-37-Reform---Ver.-4.pdf> is the draft I am referring to in the following comment. To those of you who have been working tirelessly on this Red Tape Initiative, I want to first and foremost say 'thank you!' I know this was no small undertaking and from the perspective of a small business that is struggling to not be destroyed by taxes both at the state and federal level, I appreciate the mission. Having said that, there are some areas of overreach and deep concerns I have regarding what you are proposing to do with the repeal of 37-33-402 listed on page 384 of draft version 4 for section 216 (standard) Repealer. I vehemently OPPOSE this action and ask that you remove 37-33-402 from your New Section, Section 216 as one to repeal. For starters let me send you the link to the National Institute of Health location where you can learn a bit more about the healthcare profession we are. Massage Therapy is listed in the National Institute of Health under Complementary & Integrative Health or otherwise known as NCCIH. You can find it here: <https://www.nccih.nih.gov/health/massage-therapy-what-you-need-to-know/> It baffles me that there are those of you who even considered adding this section in the MCA that recognizes massage therapy as a healthcare profession to the list of codes to repeal. Montana Code Annotated 2021 | TITLE 37. PROFESSIONS AND OCCUPATIONS | CHAPTER 33. MASSAGE THERAPY | Part 4. General Provisions | Purpose | 37-33-402. Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care. (2) It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession. History: En. Sec. 2, Ch. 451, L. 2009. I OPPOSE this action. Under no circumstances should massage therapy be removed from being recognized as the healthcare profession it is. Should your mission be to combine the Board of Massage Therapy with another healthcare Board such as the Board of Chiropractors or Board of Alternative Health, then we can have a conversation about amending (2) to reflect this change, but this section should not be repealed under any circumstances. Again, thank you for your tireless efforts and I appreciate your time. I look forward to this change to be reflected in your next draft. I also would love to be a part of discussions on how we can help with the Red Tape Initiative and as I mentioned above combine the Board of Massage therapy with one of the other Complementary & Integrative Healthcare Boards, like the Board of Chiropractors or Board of Alternative Healthcare. I can be reached at [barb@mariposamassagemontana.com](mailto:barb@mariposamassagemontana.com) or 406-437-1311.

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**Please provide your first and last name** Barbara Calahan

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233077  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name**

Katherine Berglund

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233078  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please strike 37-33-402 from section 216 in the title 37 reform bill. I oppose repealing 37-33-402 from the massage law because it is the only place in state law that acknowledges that massage is healthcare

**Please provide your first and last name** Annie Sites

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233079  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Robin Brooks

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233080  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am writing to oppose the Repeal of Medication Aides, as proposed. This change would significantly impact the ability for Assisted Living and Skilled Nursing facilities to meet staffing standards that allow for nurses to provide exceptional care of residents. Anyone familiar with this industry knows staffing is a challenge in this strained employee market as it is and this proposed change would only exacerbate a dire issue. The State of Montana needs to stop leaving seniors out of consideration. Please provide ample research and data that shows why Medication Aides should be repealed before making a decision that impacts so many businesses, employees and residents!

**Please provide your first and last name**

Teryn Waldenberg

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233081  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||((2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:En. Sec. 2, Ch. 451, L. 2009.|| ||NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None|| ||The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. || ||Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider.|| ||As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing)

Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration!

Please provide your first and last name Heather Barranger

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233082  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. ||I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. ||Why is this important? ||If we are no longer considered a healthcare profession, ||It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession. We are not adult entertainment. ||The state can combine our board with the cosmetology board. We need to be kept separate for rules and regulations as we have highly different roles. ||Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved. This affects those needing massage. ||The state can refuse to allow massage therapy reimbursement for workers comp. We know massage therapy is effective and helpful. ||Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it. Again, evidence backs massage therapy being effective in cases of MVA. ||State workers may lose the ability to be reimbursed by their flexible spending/health care benefits if massage is prescribed. ||It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied. This affects both the people receiving massage therapy and our professionals. ||Please reconsider repealing 37-33-402. ||Thank you. ||

**Please provide your first and last name** Brytany Cattaneo

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233083  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. ||I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law! ||I have been an LMT for nearly 20 years, and in that time, well over 1,000 comments have been made as to the health benefits of massage therapy. Clients have found more mental health wellness in massage therapy sessions than they have from their counselor. The benefits of healthy, therapeutic touch are tremendous for SomatoEmotional Release of trauma. ||Massage is so often recommended immediately after a major surgery, especially in the form of Manual Lymph Drainage. Massage is prescribed in conjunction with physical therapy, to rehab a knee or a shoulder. Massage therapists, in general, see more of the human body than any other profession. I have caught skin cancer on clients numerous times. I have found bumps, cysts and rashes they weren't aware they had. Our bodies aren't really looked at on a regular basis. Massage Therapists are health care professionals. To remove that description from our profession opens a door to a huge liability that may lead to terrible things, like putting us on the same playing field as sex workers. ||Please listen, so many of us have worked so hard to be where we are at today. We are honored to consider ourselves health care workers. We were honored to be in the earlier rounds of COVID-19 vaccinations. We are honored to have professional licensing in our reputable field. We love that we can help so many people in their healing journey, physically, mentally and emotionally. ||We are honored to be Licensed Massage Therapists, helping so many people in our profession as health care workers. ||Be Well,|Jessie May Campbell

**Please provide your first and last name** Jessie May Campbell

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233084  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|

**Please provide your first and last name**

Deborah McCrea

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233085  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Massage therapy is an incredibly important service that would be negatively impacted. People who depend on massage for their health and well-being would face unnecessary challenges.

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**Please provide your first and last name** Jordyn McGowen

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Form Name:  
Submission Time:  
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Comment Submissions - COPY  
December 30, 2022 5:02 pm  
Unknown  
1052233086

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Member of the public

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Dear BSD,|Thank you so much for your individual work and time as well as the overall effort of the Red Tape Reduction Initiative.||Below are a few VERY specific points to address in code about MASSAGE THERAPY. ||1. Small businesses are struggling and need simple code and lower taxes to survive.|2. There are some areas of overreach and concern that I have regarding proposed changes.||3A. STRONGLY OPPOSE what you are proposing to do with the repeal of 37-33-402 listed on page 384 of draft version 4 for section 216 (standard) Repealer. Please REMOVE 37-33-402 from your New Section, Section 216 as one to repeal.||3B. For starters let me send you the link to the National Institute of Health location where you can learn a bit more about the healthcare profession we are.||Massage Therapy is listed in the National Institute of Health under Complementary & Integrative Health or otherwise known as NCCIH. You can find it here: <https://www.nccih.nih.gov/health/massage-therapy-what-you-need-to-know>|3C. It baffles me that there are those of you who even considered adding this section in the MCA that recognizes massage therapy as a healthcare profession to the list of codes to repeal. ||Montana Code Annotated 2021|TITLE 37. PROFESSIONS AND OCCUPATIONS|CHAPTER 33. MASSAGE THERAPY|Part 4. General Provisions|Purpose|37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||4A. It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History: ?En. Sec. 2, Ch. 451, L. 2009.||4B. I OPPOSE this action. Under NO circumstances should massage therapy be removed from being recognized as the healthcare profession it is. ||4C. Should your mission be to combine the Board of Massage Therapy with another healthcare Board such as the Board of Chiropractors or Board of Alternative Health, then we can have a conversation about amending (2) to reflect this change, but this section should not be repealed under any circumstances.||In closing, thank you again for your tireless efforts and time. I look forward to this change to be reflected in your next draft.  
||<https://boards.bsd.dli.mt.gov/Title-37-Reform---Ver.-4.pdf>

Please provide your first and last name    Robyn Mohs

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233087  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Katie Miller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233088  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|By repealing this statute and placing the Montana massage therapist in this vulnerable position, the state could affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a licensed massage therapist, I can tell you that we receive advanced training that legitimize us as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to us. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider.||Thank you for your attention to this matter.

**Please provide your first and last name** Kristina Williams

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233089  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:En. Sec. 2, Ch. 451, L. 2009.|| [NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10- 105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37- 25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33- 402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. | | If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. | | I am asking you to please strike 37-33-402

from Section 216 as an item to be repealed. Thank you very much for your consideration!

Please provide your first and last name Zoe Peek

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233090  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Dear BSD, Thank you for the work and time to improve the lives and work of Montanans. Anything and everything that you can do to reduce bureaucracy, streamline licensing and decrease taxes is urgently needed in our economy and for Montana families. Today I packed a very small lunch (a banana each and graham crackers) to get my kids through our on-the-road lunch. While preparing for a non-profit board meeting at 3:30 at a locally owned coffee shop, my kids were asking for hot chocolate. I told them to ask how much it was (no listed prices). A small hot chocolate was \$4.25! I laughed out loud and said "Nope, that's not happening." It is NOT the fault of the local coffee shop that their prices are sky high, but the SMALL BUSINESSES and FAMILIES are definitely paying the high price of unnecessary bureaucracy, inflation and outrageous property taxes. What does this have to do with MASSAGE THERAPY? Bureaucracy adds up and makes it harder and more painful to run a small business. (1a). STRONGLY OPPOSE the repeal of 37-33-402 listed on page 384 of draft version 4 for section 216 (standard) Repealer. Please REMOVE 37-33-402 from your New Section, Section 216 as one to repeal. (1b). There is no logic for adding this section in the MCA that recognizes massage therapy as a healthcare profession to the list of codes to repeal. Montana Code Annotated 2021 TITLE 37. PROFESSIONS AND OCCUPATIONS CHAPTER 33. MASSAGE THERAPY Part 4. General Provisions Purpose 37-33-402. Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care. (1c). Massage therapy should remain defined as a healthcare profession as currently stated in MCA 37-33-402. Please remove from your list of codes to repeal. In closing, thank you again for your effort and time. I look forward to common sense improvements that mimic National standards in the next draft. Comments based on proposed changes in:  
<https://boards.bsd.dli.mt.gov/Title-37-Reform---Ver.-4.pdf>

**Please provide your first and last name** Chelsea Culpon

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233091  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. ||This would catastrophically effect thousands of people who use massage therapy to improve their lives. Removing massage therapy as a healthcare profession in the midst of an opioid crisis would be putting another nail in the coffin for those trying to seek pain relief without meds. |Massage therapy is a licensed profession and those therapists deserve the distinction of health care professional as do the communities they serve.

**Please provide your first and last name** Kira Pecarina

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233092  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law

**Please provide your first and last name** Katie Hall

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233093  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. To the Red Tape initiative. There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below. The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. 37-33-402. Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care. (2) It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession. History: En. Sec. 2, Ch. 451, L. 2009. NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10-105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37-25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33-402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to "eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations." The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true "Healthcare Professionals" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare provider. As a massage therapy educator for the past 24 years in Montana, I speak frequently with hundreds of Montana massage therapists

from Billings to Kalispell and beyond. If the state does not strike 37-33-402 from Section 216 repealer list, I am convinced there will be a massive surge of discontent and resistance from the nearly 2000 (and growing) Montana massage therapists. This would certainly not be in line with improving the efficiency of governmental operations. I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! Sincerely, Kellie R Allred Lic. Massage Therapist Atlas Chiropractic Kalispell, MT 59901

Please provide your first and last name Kellie Allred

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233094  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|

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**Please provide your first and last name** Brianna Greyn

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233095  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession that serves and benefits many Montanans, and it deserves that recognition in state law. As a practicing Licensed Massage Therapist who specializes in Therapeutic forms of bodywork, my scientific knowledge and ability to communicate with other healthcare professionals allows me to offer the best possible care. I work closely with several auto insurance and workman's comp clients who would no longer be able to receive the healthcare they need to improve their quality of life if this statute is repealed from law.

**Please provide your first and last name** Lindsey Caldwell

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233096  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I oppose the repeal of massage therapy from MCA 37-33-402, listed on page 384 of draft version 4 for section 216 (standard) repealer. Massage therapy is a valuable health care profession, and should remain classified as such!

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**Please provide your first and last name** Karen ODonnell

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233097  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name**

Stefanie Pierson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233098  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Licensed massage therapists not ""healthcare"" is going backwards once again in the state of MT. Every place has their parlors. But the difference is like going to a ""walk in clinic"" vs going to your medical provider. Your provider knows your medical history, medications, correlations that your body does, and your trust into your provider. Versus sometimes people choose walk in because they can't get into their provider. We know you are not getting the same quality but desperately need to see someone. This is the same for us in our massage practice. It may seem we should all be grouped into one section. I know my value, education experience, and my passion for my profession. I'm disappointed that I have to defend my career.

**Please provide your first and last name**

Leslie (James) Patterson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233100  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the Statute. |Massage therapy is a healthcare profession and deserves that recognition in State law. |I am a Lymphatic Drainage therapist who works daily with cancer survivors who have had lymph nodes removed . This is a preventative therapy that's helps prevent lymphedema (painful swelling of the extremities) . |

**Please provide your first and last name**

Sally Beall

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233101  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I opposed repeal 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I am a Lymphatic drainage Therapist who works with cancer survivors who have had lymph nodes removed. Lymphedema is caused by nodes removed and painful swelling can occur. lymphatic drainage helps the client to release the buildup of lymph in that area and it helps prevent cellulitis .(infection of the lymph system).

**Please provide your first and last name**

Sally Beall

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233102  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Shane Fahrnow

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233103  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|I have personally witnessed massage therapy positively impact the health and well-being of others as well as have experienced those positive impacts myself.

**Please provide your first and last name**

Christina DuFour

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233104  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

There is no need for an additional state license that simply uses our existing ASCP certificate to issue. Drop the state license, recognize national certifications and get rid of an unnecessary fee that does me absolutely no benefit.

**Please provide your first and last name** Mark Nelson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233105  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Brienne Stekly LMT||11/15/2022||To the Red Tape initiative,||There is a growing concern among Montana Massage Therapists that 37-33-402 is proposed to be repealed by your committee. Please see our concerns in this regard noted below.||The Montana code annotated 2021, under title 37. Professions & Occupations, Chapter 23 Massage Therapy, Part 4 General Provisions state the purpose below. ||37-33-402.?Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care.||2)?It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.||History:?En. Sec. 2, Ch. 451, L. 2009.|| |NEW SECTION. Section 216. {standard} Repealer. The following sections of the Montana Code Annotated are repealed: 37-3-101, 37-7-102, 37-8-101, 37-9-102, 37-10-105, 37-13-102, 37-14-101, 37-15-101, 37-16-101, 37-17-401, 37-18-601, 37-19-701, 37-22-101, 37-23-101, 37-24-102, 37-25-101, 37-26-102, 37-27-102, 37-28-101, 37-31-103, 37-33-402, 37-34-102, 37-35-101, 37-37-101, 37-38-101, 37-47-401, 37-49-101, 37-60-103, 37-65-101, 37-66-102 and 37-68-101, MCA. {Internal References to 37-3-101: None Internal References to 37-7-102: None} |The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist does not follow with the objective of the Red Tape Initiative. By definition, initiative 37-33-402 states its objective is to ""eliminate excessive, outdated, and unnecessary regulations which cause great economic harm on the people and businesses of Montana while also reducing the efficiency of governmental operations."" The initiative to repeal 37-33-402 would instead, create great economic harm to massage therapists. Placing the Montana massage therapist in this vulnerable position could also affect consumers from successfully receiving referrals from healthcare professionals and limit insurance reimbursement. The Montana massage therapist could then be viewed by massage therapists in other states as inferior by title and Montana state law description. | |Concerning economic harm, it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. Many massage therapists receive a significant portion of their income from these referral sources. As a massage educator I can tell you that MT's receive advanced training that legitimize them as true ""Healthcare Professionals"" for specific treatment of pathological conditions referred to them. The repealing of 37-33-402 would not only discourage reimbursement from medical professionals & insurance companies but would also be ethically dishonest as to the true status of the Montana massage therapists as a healthcare professional. | |I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. Thank you very much for your consideration! | |Sincerely,|Brienne Stekly

Please provide your first and last name Brienne stekly

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233106  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

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**Please provide your first and last name** Cassandra Crnich

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233107  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: In school to become a licensed progressional in MT.

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Fill out the form and Cut and paste the following into the comments:|Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|| oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Mariah Thurston

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233108  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the|| oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|| treat people for medical conditions and make an impact on their health. I am not a prostitute. I am not an aesthetician. I deliver clinical treatments within a medical-based approach. The massage school I graduated from has the words ""integrative medical massage"" in the title of it. To be delegitimized as a healthcare professional is insulting and completely unwarranted. I understand this is part of a greater ""trim the fat"" approach to state bureaucracy, but my profession as a healthcare provider is as legitimate as any chiropractor or physical therapist. I am not alone in this frustration.||Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.||The state can refuse to allow massage therapy reimbursement for workers comp||Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.||State workers may lose the bility to be reimbursed by their flexible spending/health care benefits if massage is prescribed.||It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.||Thanks for listening, I trust you'll do what is right for Montana.||

**Please provide your first and last name** David Kangas

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233109  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I have been a massage therapist for 3 1/2 years and have worked in the healthcare field as a professional for 20 years, most recently at Penn State College of Medicine. I have had the opportunity to take part in many client's healthcare needs with massage. I have had several client's that exhausted all options of treatment medically and found only relief with massage therapy; some I worked on for several weeks causing a limb to release that could not be moved for up to 6 months before massage therapy. I have had the opportunity to work in another state as a massage therapist. Our field is so well respected in that state as an imperative level of healthcare that medical insurances across the state, from hospitals, pay \$500 annually for their employees to have massage therapy. I am hopeful that Montana can become as progressive. As a massage therapist who works in Montana, I am asking that Montana continue to recognize how imperative it is that massage therapists be considered healthcare workers, due to the treatment we provide in conjunction with client's healthcare teams and needs. Thank you for your time and consideration.

**Please provide your first and last name** NICOLE LUKENBILL

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233110  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Ver. 1 - 10/27-2022 - SAN board to program||1. I have been a Registered Sanitarian/Registered Environmental Health Specialist since 1984 (38 years). I worked hard to gain the education and experience needed to sit for the professional exam. I have maintained my license since that time. I have given my entire career to this field with the professional license to give credence to what I do. Your proposal weakens the professional standing of a license to a certificate.||2. The field of environmental health and the professional licensing of registered sanitarians or registered environmental health specialists is nationwide. When a professional moves from one state to another, the license and education requirements may have reciprocity and eliminate the need for retaking the professional exam. This needs to be preserved for hiring and for maintaining the highest value for our license. ||3. Page 4 - (6). According to the Lewis and Clark County Human Resource Department, the position of sanitarian is one of the most difficult local positions in our county to hire due to lack of qualified individuals. Our last 3 hires were sanitarian-in-training positions because qualified licensed or registered sanitarians did not apply for the jobs. The proposed changes eliminate the Sanitarian-in-Training status (SIT), which functions as an apprenticeship and allows for the opportunity to gain practical experience under the direction of a practicing sanitarian. Rather, under the proposed rule, new hires will be required to have the certificate of registration. Since it is already a problem hiring qualified applicants, it will make the hiring process even more difficult by reducing the applicant pool. Retaining the SIT provision allows local government to hire qualified individuals and ensure that there is a properly trained pool of applicants. ||4. This will eliminate the board of sanitarians oversight of state licenses. This board is made up of 3 registered sanitarians and 2 public at large appointments. By eliminating the Board of Sanitarians, the rule-making authority for professional conduct, education requirements and sanitarian-in-training will revert to the Department of Labor and Industry. This removes the oversight of rulemaking from the hands of professionals in the field. Professionals in the field will not have a vote on the standards, CEU requirements or ethics of other professionals in the field. This is our profession. Sanitarians engage in work that requires an understanding of how disease spreads through the community in a variety of ways, including via air, water and food. Administrative staff at the Department of Labor and Industry may or may not understand the scientific process of disease transmission. ||5. Sanitarians pay the highest license fees in the state. This was done to make the Board of Sanitarians self-supporting. There is now a surplus of funds in this account. What is the purpose of eliminating the Board? Where will these funds go? ||As a Registered Sanitarian in the state of Montana, we must maintain the integrity of our license with education, NEHA examination, continuing education, ethics and licensure. Our license must have reciprocity with other states in order to obtain and keep an environmental health workforce.

Please provide your first and last name Laurel Riek

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233111  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Chiropractic Clinic Director

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I see massage as a valuable part of patients healing process and quality of life.

**Please provide your first and last name** Avrielle Simoneau

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233112  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Massage is a crucial part of pain reduction, improved mobility, improved daily function to perform daily and work tasks, as well as a great option for selfcare and improved mental health. Given the large benefit, massage is recognized by several medical insurances to provide coverage, and deserves the necessary recognition as a part of the healthcare profession. |Thank you, |Catharine Keller, Physical Therapist

**Please provide your first and last name** Catharine Keller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233113  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current Montana Professional Licensing Board Member

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Dear Mr. Cook and Red Tape Initiative,||Thank you for the opportunity to comment. |There are several issues that remain in the Title 37 Reform proposal: ||If there is only one thing to change, this would be it: |Title-37-Reform, Page 384, Section 216: Please strike 37-33-402 from this repealer! |Reason: This provision in your bill makes it harder for massage therapists to make a living and does not reduce red tape! | The implication of repealing this statute is that it will give insurance companies justification to deny payment to massage therapists, taking away an income stream for massage therapists. It can also affect our jobs: We work in a variety of medical settings which may now be denied our profession because of liability issues or the lack of ability for employers to gain insurance reimbursement. | This statute is the only place in Montana law that designates massage therapy as a healthcare profession. This may not be important for other healthcare professions because they are assumed to be healthcare. But because massage therapy takes place in a wide variety of settings, we are not always assumed to be healthcare. That is why we put it in the statutes in the first place. Thus, it is imperative that this statute NOT be struck. ||Other Changes: Listed in order of importance. |1. Title-37-Reform, Page 370, Section 215. Please strike 37-33-405 from here and amend this section to only keep the provision on continuing education (but amend it to allow a carryover of CEs into the next reporting period). |Reason: Leaving it to the board to determine the number of CEs has the potential to make it harder for licensees to keep their license - which is contrary to the red tape initiative. We have had zealous board members in the past who want to increase CE requirements and we wanted to ensure that this couldn't happen. This provision on CEs was a key compromise to even getting the practice act passed in the first place, because anti-licensing advocates wanted to ensure the board could not put onerous requirements on licensees. The number is reasonable, given that in our industry, CEs are not concerned with continued competency. ||2. Title-37-Reform, Page 33, Section 16 - Reinstitute the Quorum requirement |Reason: It's not clear what's going to happen with the Board Consistency proposal and the Enforcement proposal, they seem to have disappeared from your website. Board Consistency Section 4 dealt with the quorum issue there. But without that proposal enacted, there will be no quorum requirement at all. This is a concern because the lack of quorum can be manipulated in the decision-making process. ||3. Title-37-Reform, Page 39, Section 17 (3) - Strike or amend this provision to clarify it further |Reason: The term ""When necessary"" is arbitrary and needs clarification. |This entire provision could negate the ability of a board to abate fees without going through the rule-making process. The current system whereby boards can abate fees on their own allows boards to be agile when addressing the board's balance. Rulemaking is cumbersome and does not provide that flexibility. This also takes the determination of how to address excess income out of the board's hands and puts it into the department's. This crosses the line from the department's administrative role into policymaking that rightfully belongs to the board. ||4. Title-37-Reform, Page 26, Section 12 (3) - Strike this provision |Reason: We are also not keen on a tattle-tale provision. Forcing

people to report others removes the flexibility of trying to address the issue privately. For example, I do a private intervention on an alcoholic whose ability to practice massage is impaired. They get treatment on their own and self-report as required. If it comes to light that I didn't report them, I could be sanctioned - even though I played an instrumental role in getting that licensee to do the right thing. The same would be true if I tried the intervention and failed and subsequently reported them. I would be sanctioned because I failed to report in a timely fashion. This provision removes that flexibility.||Thank you for your time and attention to this matter.|

Please provide your first and last name Deborah Kimmet

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233114  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am in opposition of repealing MCA 37-33-402. Firstly, why is this being considered for repeal? Is it going to affect insurance reimbursements, licensing, oversight? ||Secondly, massage therapy is indeed a healthcare profession as it is based on a body of medical knowledge. Thirdly, I have received massages not only for muscular and soft tissue injury but also postoperatively for 2 major orthopedic surgeries. If not for professional healthcare management through rehabilitative massage, I would not be successfully walking. ||For whatever reasons DLI is wanting repeal of 37-33-402, I adamantly disagree and oppose it.

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**Please provide your first and last name** Carolyn Truscott

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233115  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** I oppose the repeal of 37-33-402 as listed on page 384 in version 4 of the draft. Please remove 37-33-402 from your list of codes to repeal.

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**Please provide your first and last name** Amber James

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233116  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Strike 37-33-402 section 216 Title 37 form bill||Alot of my clients come to me to feel better a natural way, so they don't have to turn to a prescription for a drug. They would rather have a prescription for a massage. I have clients that were taking prescription medication pain meds and when they started to see me they either stopped taking the medication or they decreased the usage. I can provide a list of names and numbers of clients that can tell you how much massage has helped them. I also have a few clients that were hit by drunk drivers to the point they can't really work anymore. Let me tell you how much massage has help. It us unbelievable the healing we can do with massage not just physically but mentally as well. It take our Healthcare statues away would be such a mistake.

**Please provide your first and last name** Kara Elmore

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233117  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

FSMTB opposes the Montana bill because it removes the purpose statement designating massage therapy as healthcare and removes the board's rulemaking authority by repealing 37-33-405.

**Please provide your first and last name**

Ashley Hernandez

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233118  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

FSMTB opposes the Title 37 Reform because it removes the purpose statement designating massage therapy as healthcare and removes the board's rulemaking authority by repealing 37-33-405.

**Please provide your first and last name**

Ashley Hernandez

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233119  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law.||As a Licensed professional I don't agree that the industry receives the recognition it deserves; this would be a step back in the progress we have all made to help our clients, and fellow practitioners. Massage is not a luxury item, it is a form of healthcare. If that is taken away you're removing the ability of not only practitioners to help, but the people to seek out the help they need.

**Please provide your first and last name**

Kiayah Wendel

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233120  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||Therapeutic massage is a healthcare profession and deserves that recognition in state law.||I am asking you to please strike 37-33-402 from Section 216 as an item to be repealed. ||Thank you for your continued support of our LMT Board and your respect for professional, licensed, certified massage therapists as an important part of healthcare.

**Please provide your first and last name**

Miss Peg Holwick

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233121  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Massage therapy IS a Healthcare profession and deserves that recognition in state law. | Please remove 37-33-402 from title 37 reform section 216 the repeals the statute.

**Please provide your first and last name** Laurence Deisz

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233122  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I ask that you repeal to section 216 to remove 37-33-402. ||As a licensed practicing massage therapist in this state for the last 25 years, with countless continuing education and high ethical standards, I and my colleagues have contributed to the healthcare and overall wellness of the people of this state, as any of my clients will tell you.||Massage therapy cannot be appropriately moderated by any board other than one made up of massage therapists who understand our training and practices. With the amount of initial education we go through, as well as the continuing education we each participate in, we have a vast working knowledge of the bones, muscles, nerves, and internal organs of the human body and the knowledge and skill to affect all of these. That knowledge and skill should continue to be recognized by the state as it is by other medical professionals. ||We have fought hard to gain legitimacy and we deserve to retain the status of healthcare professionals, with a board that is representative of our specific field of expertise.

**Please provide your first and last name** Rozi Pearson

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233123  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law.|I have studied human anatomy, physiology, kinesiology, pathology, the interplay between muscles, fascia, tendons, ligaments and the nervous system, the internal organs, the flow of blood and lymph and more. I routinely communicate with other licensed health care professionals to coordinate and provide the best care for my patients. I deserve to be considered and treated as a health care professional by the state and by insurers, other health care providers and the public. Please do not diminish professional healthcare massage therapists by removing massage therapy from the health care professions as this proposed repeal would do. Thank you, Linda Talbott, LMT-LIC-15808

**Please provide your first and last name** Linda Talbott

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233124  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I strongly oppose this change as a Montana state licensed massage therapist.

**Please provide your first and last name** Tera Graham

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233125  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.

**Please provide your first and last name** Jessica Golden

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233126  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform section 216 that repeals the statute|I oppose repeal of 37-33-402 because |Massage therapy is a healthcare profession and deserves that recognition in state law

**Please provide your first and last name** Barb Morris

Form Name:  
Submission Time:  
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IP Address:  
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Comment Submissions - COPY  
December 30, 2022 5:02 pm  
Unknown  
1052233127

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

• Sec. 194- 37-68-304 Pg 342: Under the requirements for Master Electrician the removing of item (3) The examination must consist of at least 80 questions designed to fairly test the applicant's knowledge and the applicant's technical application skills in the following subjects: (a) the national electric code; and (b) board rules and applicable laws under Title 37. Replacing it with: (d) have passed an examination prescribed by board rule. | • Sec. 197 37-68-305 Pg 343: Under Qualifications for journey level and Residential Electricians they are removing (b) completion of an appropriate training program conducted by a bona fide union or trade association; Replacing it with (a) have completed a board-approved apprenticeship program, training program, or trade school. | • Sec. 197 37-68-305 Pg 344: They are removing- (2)The examination for a journeyman's license must consist of at least 60 questions designed to fairly test the applicant's knowledge and the applicant's technical application skills in the following subjects: (a) the national electric code; and (b) board rules and applicable laws under Title 37. Replacing it with- (d) have passed an examination prescribed by board rule. | • Sec. 197 37-68-305 Pg 344,345: They are removing the following under the residential electrician in the same section as journey level- (c) completion of an appropriate training program conducted by a bona fide union or trade association. Replacing it with (a) have completed a board-approved residential electrician apprenticeship program, training program, or trade school | • Sec. 197 37-68-305 Pg 345: Just like the other areas they are removing |(4) The examination for a residential electrician's license must consist of at least 50 questions designed to fairly test the applicant's knowledge and the applicant's technical application skills in the following subjects: (a) the national electric code; and (b) board rules and applicable laws under Title 37. Replacing it with- (e) have passed an examination prescribed by board rule. || These could be an issue if the board was to say the union or trade association apprenticeship program is no longer approved by them then some apprentices couldn't get Montana licenses. The removing of the testing details and explanations and leaving it up to just ""prescribed by board rule"" is reckless at best, who's to say what that test would be. They could have a 5-question exam just to fill in the numbers or give the union members a different test than nonunion. Its wide open to do what ever they want with no guidelines at all to go from. ||

**Please provide your first and last name** Luke Hoffer

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233128  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.|Why is this important?|If we are no longer considered a healthcare profession,|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession|The state can combine our board with the cosmetology board|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers comp|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.||I am appalled to learn of this. As a healthcare professional of more than 30years, with over 4000 hours of education specifically in my field of practice, that this would ever be considered. Please rethink this one!

**Please provide your first and last name** Carolyn Dewey

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233129  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|||Please strike 37-33-402 from section 216 in the Title 37 Reform bill.||  
oppose repealing 37-33-402 from the massage law because it is the only place in state law that acknowledges that massage is healthcare.|| am in the business of pain reduction which IS healthcare at its most basic.||Sincerely, Jessie Vaillancourt, LMT Alberton, MT |

**Please provide your first and last name**

Jessie Vaillancourt

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233130  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft Name - Repeal of Medication Aides|I am referring to the Entire Bill|I am opposed to this Bill as it repeals medication aide legislation for both nursing homes and assisted living facilities. Todays law allows for properly trained individuals to pass medications in our facilities. As a licensed nursing home administrator and operator of an assisted living facility serving 50 residents, we have had success using med aides licensed in Montana vs. hiring a more expensive LPN to provide the same service. This Bill would be a BIG step backward to lose a category of direct care worker - for workers, for the facilities and for the residents. We use Med Aides as a career path for our CNAs who want to go up the career ladder. They are encouraged to train and pass the exams to pass medications . Once they pass and are licensed in Montana, they will earn a higher wage as a Med Aide. This frees up nursing time, has resulted in fewer medication errors with individuals dedicated to the purpose of passing meds. We need licensed Med Aides more now than ever with the nurse and direct care worker shortages. Please join me in opposing this repeal of common sense law that makes Montana smarter and more efficient during a time when we can not hire nurses or direct care workers. Thank you.

**Please provide your first and last name** Jason Cronk

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233131  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Earlier this week was the first time I heard about this draft by a peer. I have lived in MT for over 20 years, and I have been an LMT for 27 years. I was a member of the Bill Development Group Committee and Government Relations Committee to pass a bill for Licensure for Massage Therapy. I have also been an instructor in the massage community for 26 years. I continue to work toward elevating my professions standard of operations and protecting our community from injury and providing advanced therapeutic massage treatment. A portion of my clientele are individuals that have been referred to me by M.D.s, P.T.s, P.A.s and other HCP to provide massage therapy related to MVAs and work related injuries. Often times I am recruited to participated in the team of providers helping the individual to return to activities of daily living and work pain free. Often times I am the last ditch effort to provide a decrease in discomfort/pain to the client. If LMTs are lumped into the Board of Cosmetology will decrease public safety and respect for our profession. There is a good chance that insurance companies will stop allowing their clients to be treated by LMTs and collect reimbursement or direct billing to the insurance company. There are already a few auto insurance companies that are trying to make it so that only M.D.s and P.T.s can provide massage therapy. The reality is no M.D.s are trained and P.T.s either receive no training or very little. This population of our community may have this important treatment removed as an option. Physiologically massage therapy provides change in the client's tissue, posture and pain/tension levels that cannot be met by other HCP. If we are included under cosmetology's board (which is not a HCP, but a beauty profession), we would lose our professions elevation and respect within the health care world. Our community would no longer have access to insurance paid therapy.

**Please provide your first and last name** Nicole Kay

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233132  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Medication aides are an imperative position in long term care setting. As LTC facilities across the state of Montana continue to close related to staffing shortages, financial concerns and many other reasons, it would be a devastating event to cut this direct care employee. Medications aides assist with medication passes, in doing so this frees up the nurse to be able to complete more thorough assessments on residents and better meet needs of higher acuity resident's. I am a Registered Nurse and have worked hand in hand with medication aides in a LTC setting for several years and know the value that they possess. I think it would be a very foolish idea to cut this direct care position.

**Please provide your first and last name** Samantha Embody

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233133  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

This question was partially addressed in the informational session just concluded: As an LMT I have already made a comment on the changes to Massage Therapy, but something additional has occurred to me and I wonder whether it has occurred to the Department: If the healthcare professional designation is removed (the proposed removal of 37-33-402), many of us who get referrals from PTs or MDs and who get reimbursed through insurance will be threatened and probably become defunct. Has this been considered-or perhaps it was addressed somewhere I was unable to find?|The response was that the healthcare designation was enshrined elsewhere--can someone please give me the reference?|Thank you.

**Please provide your first and last name**

Michelle Clement

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233134  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||massage therapy is a healthcare profession and deserves that recognition in state law

**Please provide your first and last name** Donita Sioux

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233135  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||| oppose repeal of 37-33-402 because|||massage therapy is a healthcare profession and deserves that recognition in state law.||1. It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession.|2. The state will be able to combine our board with the cosmetology board.|3. Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|4. The state can refuse to allow massage therapy reimbursement for workers comp.|5. Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|6. It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.|7. It could possibly close the doors of many massage therapists as a small business.

**Please provide your first and last name** Donita Sioux

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233137  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law. Massage therapy is an incredibly important service that would be negatively impacted. People who depend on massage for their health and well-being would face unnecessary challenges.

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**Please provide your first and last name** Jordyn McGowen

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233138  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**      Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. I appreciate your giving me this opportunity and considering my points and expertise on these issues. I have spent 22 years as a professional educator in the State of Montana. I am currently enrolled in the Massage Institute of Montana School to obtain my massage therapy certificate. Learning a new skill at age 48 can be daunting, but at the same time supports my belief in being a lifelong learner. For the past twenty-two years it has always been my passion to be a massage therapist. I have held on to this dream and have never wavered from it. I have been spending recent years dedicating my time to being an educator and being a mom to my 8-year-old son, whom my husband and I adopted at birth. I am excited about my new endeavors in such an important and rewarding career of helping people to feel better. Which is needed more than ever following the worldwide pandemic we all went through. Obtaining my Massage Certificate would help me to live the dream I have held onto for so many years. I desire to be a role model to other students in the class by leading and managing a study group. In addition, I want to also be a role model to my son as a lifelong learner and show him that anyone can achieve their dreams when they set their mind to it. I am frustrated to read that my dream to get my massage therapist certificate is now being changed to a less appealing certificate and one that is less reputable. This is not appropriate. Massage Therapists are health care workers. Period. This is important that Massage Therapist stay in the healthcare profession because of several reasons listed below: -medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved. -it opens up to be regulated like adult entertainment (sexually oriented business), not as a healthcare profession. This is NOT acceptable! -massage therapy would no longer be workers comp eligible. -Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it. -It will affect massage therapists employed in medical settings (chiropractic offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied. -It is ridiculous to put massage therapists in with cosmetology; they are completely different fields of study. My driving passion to be a massage therapist is to understand the human body and how to alleviate pain, so people can enjoy life more! The medical field, with the new terminology in anatomy/physiology, pathology and kinesiology is challenging and one that has difficult classes; however, I feel that I will have no problem rising to this challenge. I have had many challenges in my life including a cancer diagnosis 16 years ago. at the age of 32. I had a three-inch tumor in my sigmoid colon, which required me to have a colon resection followed with radiation. I also needed to have my uterus and ovaries removed at the age of 32, which was extremely difficult because I had not yet had children and being a mom continues to be the most important dream to me. I became a mom at age 40 after a very long seven years wait and a painfully failed adoption. Just like my goal to be a massage therapist my goal to be a mom never changed. It might have

taken me a bit longer to reach these goals, but nevertheless I did. I fought cancer and won, but the scars I live with are much deeper than the incision down my abdomen and pelvis. The scarring from the radiation has caused damage throughout my abdomen cavity. Through professional myofascial massage, diaphragmatic breathing, gentle yoga, Physical Therapy and calming meditation I have managed to lessen the pain. I want to share with others what has worked for me and can work for them. ||Massage therapy has been the single MOST important aspect to maintain and improve my health. I have been free from cancer for 16 years but have the extra burden of monitoring my health and having yearly CT exams, colonoscopies, endoscopies, pelvic exams, and medications that I need to take to maintain my health and help others improve their own health. I have fought and overcome so much in my life but continue to struggle. With the help of my professional massage therapist, I am able to improve myself physically, spiritually, and emotionally. I desire to help others as I have been helped by massage therapy.||I appreciate your giving me this opportunity and considering my points and expertise on these issues. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute.]

Please provide your first and last name natalie sorensen

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233139  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Medication Aide positions: I oppose the idea to eliminate Medication Aides. Medication aides are utilized in our facility. They are able, under a nurse, work and pass medications allowing our LPN's and RN's to complete assessments, wound care etc that is necessary to help long term care facilities stay afloat. They help in case of nurse call off's, sickness, Covid outbreaks. They are able to help in times of crises when there are not enough nurses to go around. I employ you to seriously reconsider eliminating this position.

**Please provide your first and last name**

Karin Propp

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Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052233140  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: RRT for 26 years, licensed in 10 states

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First let me I thank you for allowing me to comment topic. Montana is already a step ahead of other states by willing to cut red tape and ask for suggestions. Eliminating licensure verification from each state would be very helpful for applicants saving time and money. All state websites have this information in real time on their sites to access for free, Why not use this to compare it to a list on an application for verification? Colorado and Maine specifically use this process for licensure application and only use their website for verification. Neither state will send verification, I hope this is helpful to some degree. Thank you for your time.

**Please provide your first and last name** Jay Farnam

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
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Unique ID: 1052233141  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The repealing of 37-33-402 which takes the title of Healthcare Professional from Massage therapist is incredulous. I am paying hard earned money to receive ethical professional training, and will continue to contribute toward state fees for professionalism (licensing, etc). Our profession pays to practice in this state, our industry contributes, and we demand to be recognized as such: as the healthcare professionals we are. |As a current student enrolled in a MT state program and will prepare for my MT Massage Therapist licensure in May 2023. The training is rigorous, involving many clinical hours mandated by the state. I am learning health care professional standards and terminology so I may be respected as such and part of a team of caregivers ensuring Montanans feel optimal. This state is nothing without its hard working, value-driven and kind hearted people who make this the last best place, and I have given up an enormous amount in order to serve and support my fellow Montanans in feeling their best. |In summary, I am paying hard earned money to receive ethical professional training, and will continue to contribute toward state fees for professionalism (licensing, etc). Our profession pays to practice in this state, our industry contributes, and we demand to be recognized as such: as the healthcare professionals we are.

**Please provide your first and last name** Jamie Kujawa

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233142  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a Longtime Licensed CLS, i want to make a few comments regarding the changes proposed for the Licensure protocols for CLS. It is critically important that there are people who understand the profession are the ones making decisions such as the appropriateness of CE (37-1-306) The whole point is that our work force stays current and provides quality answers for our patients. There needs to be a standard way to monitor and address complaints against licensee's (37-1-101, 37-1-131) with out a board who understands the profession it will be difficult for proper/appropriate monitoring. Our State has been at the forefront of licensure, and this is a benefit to the care of Montanans, NOT a detriment! It is something to proud of. CLS licensees have earned the right to be licensed and should be managed appropriately- not by by well meaning folks who have no true idea what is required but by people who have provided outstanding care and hard work to provide exceptional results and understand the importance.

**Please provide your first and last name** Renee Kloser

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052233143  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Other: Association Executive Director

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The Montana Health Care Association is an association that represents nursing homes and assisted living facilities throughout the state of Montana. I am submitting these comments on behalf of our member nursing homes and assisted living facilities. ||MHCA opposes the repeal of medication aide statutes because: ||1. Prior to medication aide licensure, the board of nursing took the position that passing medications falls under the scope of practice of nurses and that others could pass medications only under delegation from a licensed nurse. That meant that an individual had the ability to be a medication aide only if a licensed nurse authorized that. Many nurses opposed allowing anyone else to pass meds and there was a significant turf battle when we had legislation proposed on our behalf to create medication aides with their own ability/authority/license to practice. The legislation you are now proposing to repeal is what has allowed medication aides to practice in Montana in a meaningful way. This licensure allowed for properly trained medication aides to carry on a profession without interference or turf issues and in a way that is safe for the public. ||2. Medication Aide I and Medication Aide II licensure provides for the safety of the public, which of course is the purpose of licensing. Public safety requires that only properly trained individuals should provide medication to people in our long term care facilities. The reason there are two levels of medication aides is to take into account the frailty and health issues of the people being served to assure the practice is safe. The provisions for Med Aide I are less stringent than for Med Aide II because the individuals who are served in assisted living are not as medically frail/complex as those served in nursing homes. The Med Aide II adds requirements to take into account the more fragile state of nursing home residents. This licensure absolutely adds to the safety of the public. ||In most assisted living staff cannot pass medications. However, they can ""assist with SELF-administration"" and that has been defined to include pretty much everything that is including in actually administering medications. That is probably why there are so few who have obtained the Med Aide I license. However, we would argue that any number of licensees in this category is improving the care and safety of the individuals served. We are doing all we can to promote this level of practitioner (even though it isn't required) because we believe it adds to the health and safety of the residents. ||In nursing homes there is no such definition of ""assisting"" with self administration. So medications have no ability to practice unless a nurse is willing to delegate. ||3. Delegation. (24.159.1611 ARM) The Department has taken the position that nothing really changes when you repeal med aid licensure - we can simply use ""delegation"". However, everything changes. We can no longer hire a trained medication aide and put them to work. Their ability to work depends on the delegating nurse. While licensed nurses have come to respect and see the need for medication aides (in the facilities that are using them), many nurses are not comfortable with delegation. The main reason is that the delegating nurse retains professional accountability for the delegated task. If a medication aide makes a mistake, it is not the aide that is accountable - but the nurse. Some nurses have described it as putting their license on the line and accepting liability that they are not willing to accept. It is reasonable for

them to not want to accept this risk. Med aide licensure has allowed them to use med aides without accepting unreasonable risk. Delegation is also cumbersome. It is more red tape- not less. Delegation is person by person. In other words, the nurse can't simply delegate the medication pass to another individual or even a trained medication aide. Among the things that must be determined is whether delegation is safe for each particular resident on a case by case basis. For each delegation the nurse delegating is responsible for determining if the person to whom the task is delegated is competent and has proper training, determining for each patient whether that patient is appropriate for the task to be delegated, and a whole list of other determinations/judgments that fall on the delegating nurse. It is not surprising that nurses aren't always enthusiastic about this process. With a licensed medication aide, the legislature has set the basic criteria for the practice in various settings, keeping public safety in mind. The legislature has also put this category of practitioner under the Board of Nursing and provided rule making authority so the Board is able to implement this level of practitioner in a way that is safe to the public. Once licensed, the state has determined this person is qualified to have a license and practice within their scope - as with all other licensure.

4. Workforce shortage. Long term care is experiencing a workforce shortage that surpasses what is being experienced even in other health related services. Bureau of Labor Statistics information shows that the long term care sector /congregate living has been the slowest sector to recover staff - and for the most part has not recovered staff lost over the past few years. Our numbers are far lower than hospitals and other health care sectors. This is a time when we need to utilize Medication Aides more than ever. We cannot afford to do anything that could even remotely affect our workforce. The medication aide licensure is being used to help with the nursing shortage and also to help attract and retain staff as it is an important part of a career ladder for CNA's. While it is not the purpose of licensure to create a career ladder for our facilities, it is the purpose to protect public safety. Anything that would make our worker shortage any worse than it is would certainly affect public safety. Anything that anyone does in this particular sector of health care right now can have unintended consequences to the detriment of those being served.

Are changes needed to Med Aide licensure? Yes, there are some changes that would improve this licensure category, to make it easier to attain/use and more reasonably align the requirements with what is needed to protect the public. Some helpful changes would be:

1. 37-8-423. (1)(3) Medication aide II - qualifications. Reduce the requirement for employment as a certified nursing assistant in a long term care facility from 2 years to 6 months. Receiving the 80 hours of CNA training and working in a facility for 6 months - plus the med aide training - can be reasonably expected to protect the public while allowing us to train and utilize med aides at a time we need them most.
2. 37-8-423 (7) ...qualifications. Reduce the continuing education requirement from 12 hours annually to 8 hours annually. Twelve hours is more than what is necessary to keep a trained medication aide abreast of current and ongoing education in pharmacology and medication administration.
3. All language that refers to a medication aide practicing in a "long term care

facility licensed to provide skilled nursing care" should be changed to clarify that Medication Aide II can practice in a critical access hospital with swing beds. Critical access hospitals in our rural communities provide a great deal of skilled nursing care in their swing beds and it would be appropriate that they be allowed to use Med Aides II. I appreciate the opportunity to comment and would be happy to work with you on issues related to medication aides. The bottom line is we believe it would be a mistake to repeal this licensure and are asking you to reconsider your decision to propose legislation to repeal medication aide statutes. There are, however, improvements that could and should be worked on to provide the needed balance between unnecessary regulation and assuring public safety. Again, thank you for your work on red tape reduction and your consideration of our comments.|||||||

Please provide your first and last name Rose Hughes

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IP Address:  
Unique ID: 1052233144  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Fix your site links, they are inactive. Click on Apply for License and the site never responds. Why?

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Fix your site links, they are inactive. Click on Apply for License and the site never responds. Why?

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**Please provide your first and last name** Rex Rex

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|I oppose repeal of 37-33-402 because|massage therapy is a healthcare profession and deserves that recognition in state law.||I am currently attending school to become a massage therapist, if this is not removed this move the massage therapy professional to a lower level than all other states by not be considered a healthcare profession. Why is it important that the profession is classified as a healthcare professional?|It opens us up be regulated like adult entertainment (sexually-oriented business), not as a healthcare profession|The state can combine our board with the cosmetology board|Medical professionals who regularly refer to massage therapy may no longer do so because of the potential liability involved.|The state can refuse to allow massage therapy reimbursement for workers comp|Insurance companies can refuse to pay for massage therapy for personal injury cases (motor vehicle collisions) even if a doctor orders it.|It may affect massage therapists employed in medical settings (chiropractor offices, hospitals, medical clinics, hospice, etc.) as reimbursement could be denied.

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**Please provide your first and last name** Colleen Lillie

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute|||I oppose repeal of 37-33-402 because|||massage therapy is a healthcare profession and deserves that recognition in state law.|

**Please provide your first and last name** Kris Crozier

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Unique ID: 1052233147  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).** According to a report published by the Montana Department of Public Health and Human Services, in 2021, Montana ECPs administered fentanyl 6,840 times, versed 1,412 times, morphine 1,195 times, rocuronium 122 times, and vecuronium 87 times. ||I share this information to emphasize the importance of physician medical director involvement in all aspects of ECP regulation and the importance of maintaining ECP access to a medical assistance program as the Department of Labor and Industry moves forward with this proposed change. |

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**Please provide your first and last name** Terry Mullins

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The following comments are made as a private citizen, not on behalf of the Board of Clinical Laboratory Science Practitioners. In principle I agree to the overall concept of red tape reduction and standardization of licensing across professions. I think this effort seems well thought out and for the most part there are a lot of good changes proposed. However, I strongly urge those involved to reconsider the proposal to eliminate the Board of Clinical Laboratory Science Practitioners and replace it with a Program. My comment narrowly is this: eliminating the Board of Clinical Laboratory Science Practitioners will lead to a significant and real reduction in public safety and welfare. As a current Board member who has served for three years I can provide many real-world examples of how Program management would fall short of protecting the public, particularly in deciding and carrying out disciplinary actions against licensees. The details of these cases are of course confidential and I will not discuss them here. The reduction in public safety and welfare is not limited to disciplinary action, but also in the function of setting standards for licensure. Being a CLS license holder does of course mean that the individual is a subject matter expert in the practice of the profession, performing complex diagnostic testing. However, particularly in our profession, simply being a license holder does not equal being a subject matter expert in the standards of our profession, i.e. scope of practice, legality, licensing requirements, accreditation, continuing education. The function of our Board is absolutely necessary and cannot simply be replaced by drawing from the pool of license holders. I am happy to provide examples and further discuss my concerns. Respectfully submitted, William Peterman MLS(ASCP)

**Please provide your first and last name** William Peterman

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Version 1 of private security. My concern here is what is the plan? If you repeal 2-15-1781, 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112, Is there a plan to take care of these needs in the state of MT? Process servers also act as levy agents. Our jobs are to legally and ethically serve documents like summons and complaints, divorce papers ect. We also execute Writs of Execution issued by the courts in the state of MT. That means we seize bank accounts, garnish wages, seize property ect. Then we file affidavits with the court.|| To not have licensed and bonded companies/people performing these things, seems like a huge risk to the public.|| The company I work for serves thousands of papers a year and executes several thousand writs a year. We levy millions of dollars a year. There are many companies that do this in MT, indicating the need for this to be done. The process in place works. It could use some more oversight on the licensing part as far as ensuring the licensed folks do not have prior records every time the licenses gets renewed, other than that the current MCA and rules work very well for this industry. || I have HUGE concerns and would like to know what the plan is here. || Thank you for your time.

**Please provide your first and last name** Danyelle Moore-Lowry

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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My comments below are in relation to draft Version 2 - Board Consistency Reform Draft (10/3/22). There are 4 elements of this draft that I oppose:|1. NEW SECTION 3 (4), Changes to Public Member. The public member of any board needs to be someone who has subject matter expertise with the industry that they represent. Removing those who have relations who work in the industry simply eliminates the best possible candidates to serve on the board.||2. NEW SECTION 3 (5), Disqualifying Seated Association Directors. As a licensed outfitter, I also serve as the Director at Large of the Montana Outfitters and Guides Association. One thing that has become clear to me over the years of this service is that there are very few of us who are licensed that are engaged enough to serve as association directors. If you eliminate these individuals from qualification to serve on the Board of Outfitters, then you are left with very few, if any, individuals who have the requisite background and experience to effectively serve on the Board. Like the comment above, this would automatically leave the least qualified and least engaged as our Board members. Furthermore, I do not view serving as an association director as a conflict of interest that would preclude the association director from serving as a neutral Board member. Nor have I seen any of these conflicts of interest from past Board members.||3. NEW SECTION 3 (2), Appointment-Qualifications-Terms. I oppose the authority of the Governor to dismiss ANY Board member without cause. Largely this opposition is for those instances when a new Governor becomes elected. In these instances, the new Governor could completely dismiss the entire Board without cause, leaving us with a Board that has zero experience in the governance of the Board. This is never a good situation for any professional Board. When changes in administrations do occur, current seated Board members are needed to provide a level of continuance with the standard Board practices before the newly appointed Board members learn how to effectively operate as member of the Board.||4. Section 34 MCA 2-15-1773 (a) Elimination of Packing Endorsement. During the last legislative session, MOGA wrote and helped pass SB 275. This bill established the preference for a packing endorsement for the public land fishing and hunting outfitter seat on the Board. This was not a move that MOGA unilaterally decided on. There are 2 outfitter associations in Montana - MOGA and FOAM. While SB 275 was in draft, there were many deliberations between these 2 organizations in how to most effectively reorganize the Board of Outfitters. The result of these deliberations was the industry consensus found in SB 275, which was passed by the legislature and signed into law by Governor Gianforte. Eliminating the preference for a packing endorsement is contrary to what was passed in SB 275. Therefore, it is contrary to the consensus of the outfitting industry.||Thank you for your time.

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**Please provide your first and last name** Scott Vollmer

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Myself and many others know that massage is more than just "pampering". I have a degree in Physical therapy, as well as my massage license. I have helped clients with improved range of motion, decrease in pain, and overall benefits for well-being. Even stress relief is an integral part of self care. I also know massage therapists who offer lymphatic drainage which is very important for those with lymphedema diagnoses, especially important for cancer patients. There are so many health benefits massage can offer. Thank you for understanding this.

**Please provide your first and last name** Amanda Weller

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

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As a Laboratory professional who has worked in states with and without licensure, I am extremely concerned about this proposal to remove the CLS Licensure Board. Licensure is critical to patient safety and Montana is in the forefront in the country with not only an excellent licensure law but also a licensure board made up of CLS who know the ins and outs of this profession. The clinical laboratory is a highly complex field with severe patient safety implications. Removing this board removes the knowledge necessary to ensure that only those with the expertise and knowledge necessary to work in this field are taking care of you and your family. After working in states without licensure, I know how critical this is. I have seen what can happen without the necessary oversight and I do not wish to see that happen here. |Concerns:|1. Licensing will not go away, it will be handled by Division of Labor and Industry staff| - this means License increase will be determined by DLI staff with no input from licensees| - 37-1-306 this also means that continuing education will be determined as ""germane to the profession"" (or not) by DLI staff who don't really know what a CLS is. This may allow credits to be accepted for CE that have nothing to do with our profession.||2. 37-1-101. 37-1-131. There is no proposed way to continue with screening and adjudication of complaints against licensees. | - this is the most important part of the board's job. Without this process, in place the safety of our patients in Montana is at great risk. ||3. It has been shared that ""only 13 states require CLS licensure"" so it's not that important. In reality, Montana licensure ensures we are a state leader in providing the highest levels of patient safety and are a leader in that realm. Without this, we are decreasing the value and technicality of our profession so that anyone has the potential to perform your family's laboratory testing regardless of their risk to patients.|

**Please provide your first and last name** Holly Weinberg

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Director or member of an association connected with a licensed profession

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Comments on Behavioral Health Consolidation bill ||The Montana Psychological Association is submitting the following comment regarding the Behavioral Health Consolidation bill||NEW SECTION. Section 5. Exemptions from licensure. (1) The respective license requirements in this chapter do not prohibit: |(a) a member of another profession from performing duties and services consistent with the individual's licensure or certification or, in the case of a qualified member of another profession who is not licensed or from performing duties and services consistent with the person's training, as long as the person does not represent by title that the person is engaging in the practice of behavioral health; ||We don't understand why title protection for the term behavioral health is being inserted into this bill when the Department is removing title protection from other practice acts. The practice of behavioral health is a generic term and is used by many mental health practitioners such as psychologists and behavioral analysts. It is so generic that there are billing codes that are for behavioral health that providers other than those licensed by the Board of Behavioral Health use. There are CMS definitions for reimbursement of behavioral health that include psychologists. It is possible, but we have not had the time to verify, that billing codes for dementia treatment could be impacted. It will be very confusing to the general public if all practitioners that engage in the practice of behavioral health are suddenly not allowed to inform the public of their practice. Throughout its entire history, the behavioral health field- including current behavioral health and integrative behavioral health models- has incorporated the practitioners under the BBH as well as nurses, medical doctors, psychiatrists, psychologists, behavioral analysts, and more. Never has the field of behavioral health only included those professions which are licensed through the Board of Behavioral Health. This language needs to be further evaluated for long-term consequences.||

**Please provide your first and last name** Marti Wangen

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Unique ID: 1052233154  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Hello,||I would like to voice my concern for eliminating the license for Process Servers/Levying Officers and Private Investigators. While I agree that some of the licensing requirements could be loosened, I don't believe that this is the best way to go about it. ||Private Investigators have access to a lot of sensitive information through subscription services like TLO, Accurint, Merlin, etc. Without a valid license, I don't know if they will participate with us to get us set up. Conversely, if they will work with unlicensed people, anyone will be able to get access to that information. ||With regard to Levying Officers, there is nothing that I can see that outlines how to become one of those. If the license for Process Server is removed, the Levying Officer designation goes with it. That would cut off an arm of my profession that accounts for about half of our earnings. The only entity that would be able to serve Writ's of Execution would be the Sherriff, which they would not be able to handle. I know the governor's initiative is meant to open up private business, but this would cause a huge shift from privatized business to public.||I think there are some things that we could do to make it easier to get a license, but completely removing the overseeing board would cause a lot of issues for the courts, the Sheriff's Office, and every Process Server that also serves Levies.

**Please provide your first and last name** Tyler Paulsen

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Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Draft Version 1 Repeal of Medication Aides. I oppose the Repeal of Medication Aides. There is an extreme nursing shortage and by having Medication Aide I and II available for both assisted living and long term care allows facilities to better manage the time their nurses have to care for residents. Nurses spend a minimum of 60 percent of their day passing medications when they could be spending more time with their residents doing assessments and treatments. ||This program is very important and is desperately needed. For Long Term Care it enables current staff such as CNAs to get further education allowing them to stay in health care and move up the ladder to a position that requires less physical exertion but more mental. This program was fought for and is desperately needed. Please do not get rid of this option. ||I am the Administrator of Gallatin Rest Home in Bozeman Montana. Being a county owned SNF it has taken time to get where we can request a position such as a Medication Aide II. We are looking into the education required in the hopes of retaining some of our current staff using this as a career ladder. This industry needs all the options it can possibly get to keep those in health care motivated to stay. PLEASE DO NOT repeal the Medication Aide program.

**Please provide your first and last name** Darcel Vaughn

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Good afternoon, I am an LCPC (MT, currently inactive), MN, and ND. I am wanting to reactivate my license and look forward to re-establishing myself here. I am required to provide proof of CEU's (10 hours for each year I have been inactive). I am wondering if it wouldn't be easier to accept proof of CEU completion by the fact that I am licensed in good standing in the two other states, with no break in coverage, and both of which require proof of CEU's to continue practicing. It seems like it would save time for both the Board and licensees. Thank you for taking my suggestion.

**Please provide your first and last name** K. Olivia Janis

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Current licensed professional in MT

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PSP - Board to Program|Private Security Bill referring to sections: 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112, 37-60-201, 37-60-211, 37-60-302 and 37-60-309||I fully oppose the delicensing of process servers and levying officers. We deal with sensitive data, millions of dollars every year, and important court documents that pertain to any form of lawsuit to subpoenas. To de-license someone that handles this type of classified information is substandard, and a move backwards in our industry. We have a large impact on people's lives and there should be oversight on a process server, including federal background checks. How does the state plan on keeping legal rights from the public infringed upon, if this moves forward?||I strongly oppose this Bill to move forward as there are too many negative effects to Montana citizens in this profession and those who deal with the likes of professionals like myself.

**Please provide your first and last name**

Cassie Koch

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Unique ID: 1052233158  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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I am against ""Version 1 - ATR Board to Program"" as this removes athletic trainers from overseeing licensed athletic trainers and places oversight into the hands of individuals in the program that likely don't have the proper education, training, or credentials to adjudicate cases and make medical recommendations. Athletic trainers are recognized by the American Medical Association (AMA) as allied health professionals and are trained in the prevention, diagnosis, and intervention of emergency, acute and chronic medical conditions involving impairment, functional limitations and disabilities. I am against ""Version 1 - ATR Board to Program"" as dismantling the Board would result in athletic trainers being governed differently than other healthcare professionals, which only puts the health and safety of the thousands of Montanans that are treated by athletic trainers in jeopardy. Often confused with personal trainers in local gyms, athletic trainers (ATs) are recognized by the American Medical Association (AMA) as licensed healthcare professionals. Though ATs are commonly seen on the sidelines of high school, collegiate and professional athletic events, they do work with public safety organizations, in occupational health, and with the military to prevent, diagnosis, and treat acute and chronic medical conditions involving impairment, functional limitations and disabilities. Dismantling the Board of Athletic Training and not having ATs governed like other healthcare professionals would put the health of countless Montanans at risk. Due to this, I strongly oppose ""Version 1 - ATR Board to Program.""

**Please provide your first and last name** Justin Hunt

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Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: PA APPLICANT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

TRANSCRIPTS OF MEDICAL PROFESSIONALSIS FRANKLY, USELESS. IF ONE HAS COMPLETED THE TRAINING AND PASSED PANCE, ONE IS QUALIFIED TO PRACTICE MEDICINE; GRADES NOTWITHSTANDING. | A TEMPORARY LISENSE IF ONE IS LISENSED IN ANOTHER STATE AND IN GOOD STANDING WOULD TAKE THE TEMPORAL PRESSURE OFF ON EVERYONE. |

**Please provide your first and last name**

GERALD BOSSERT

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052233160  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Submitted by Montana Pharmacy Association- 11-22-2022||While our association concurs and supports many of the changes in the Red Tape Reduction Initiative, we respectfully ask for consideration in keeping the Board of Pharmacy as is, or consider a restructuring formula that would maintain all four pharmacist positions on this important regulatory board. Reasons we make this request include:|- The Board of Pharmacy is already one of the smaller regulatory boards and helps the agency regulate a major health care profession with just seven members.|- The pharmacy profession is very diverse. A regulatory board with at least four licensed pharmacists is needed to understand the pharmacy services that are provided in a variety of settings such as community pharmacies, hospital pharmacies, long-term care facilities, clinics, and other research- or industry-related settings. |- Above all, we are concerned that a smaller Board of Pharmacy with only three pharmacists is a regulatory step backward for patient safety at a time when the services provided by pharmacists across Montana and the nation is growing and becoming more complex. For instance, pharmacists in Montana not only dispense medications but also provide immunizations, perform medication therapy management, assess patients and prescribe medications (under collaborative practice agreements), and provide a variety of consulting services. Therefore, a Montana Board of Pharmacy with at least four pharmacists is justified and should be maintained to provide adequate oversight to ensure patient safety.||Sincerely,|Stuart Doggett|Executive Director, MPA|

**Please provide your first and last name** Stuart Doggett

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233161  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute. I oppose repeal of 37-33-402 because massage therapy is a healthcare profession and deserves that recognition in state law. There is much science behind this profession to help aid in the healing processes of those who suffer physical, mental, and emotional pain. This is not just a practice that focuses on just relaxation. It aids in healing for the injured. For those who need more than a Chiropractor, PT, or other Doctor. We aid in the process of healing making massage therapy apart of the medical field as an additional part of the Doctoral team. Taking massage therapy away is like taking an Oral Hygienist away from the dental practice. We both deserve our Licenses to keep the medical profession afloat and give patients hope for a better and improved life. amta states, "Legal recognition of the practice of massage therapy and clearly-stated requirements to practice are essential to promote the profession and protect the health, safety and welfare of the general public. Legal recognition of massage therapy through licensure enables a state or jurisdiction to discipline a massage therapist when warranted and to create standards of care. Therefore, legal recognition of massage therapy through licensure protects the public through establishing a consistent standard of practice which is enforceable by a professional code of ethics"(amtamassage.org). Any person without the proper training and knowledge to administer professional massage cannot adhere to these high standards.

**Please provide your first and last name** Jocelyn Gouchenour

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Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233162  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

It appears that ""Sanitarian-in-Training"" is being eliminated. This would greatly hamper the ability of local health departments to hire someone and have them work under the supervision of a current registered sanitarian while studying to take the exam. It takes most new hires 6 months or more to prepare for that exam. In almost 19 years of employment with one of the larger county health departments, we have never hired someone who was already a registered sanitarian. I imagine it would be even harder in the more rural counties.

**Please provide your first and last name** Jesse Green

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052233163  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The Montana Environmental Health Association (MEHA) represents the expertise of 121 Registered Sanitarians and environmental health professionals across Montana who assess, provide compliance assistance, and enforce state and local regulations related to clean and safe food and environments. ||The Montana Environmental Health Association presents the following considerations and concerns to the bill for an act entitled: ""An Act amending the sanitarian licensing statutes amending section 37-1-401, 37-40-101, 37-40-302, and 37-40-312, MCA; repealing sections 2-15-1751, 37-40-201, 37-40-202, and 37-40-203, MCA.""||1. The term ""Registered Sanitarian"" should be explicitly retained and continue to mean a sanitarian registered under 37-40-101. Because a sanitarian with a certificate of registration can use the initials R.S. after their name, keeping this definition will make it clear what R.S. stands for. Alternatively, the Department could consider aligning with the National Environmental Health Association's (NEHA) terminology of ""Registered Environmental Health Specialist (REHS)"". ||2. The Sanitarian in Training (SIT) pathway is critical to supporting an individual in becoming a licensed Registered Sanitarian and critical to local government recruiting and retaining their environmental health workforce. The current proposal deletes a reference to a SIT. It would be very difficult for counties to hire only Registered Sanitarians, without a provision for a new employee to legally work as a sanitarian while completing on-the-job training and preparing to take the comprehensive, national test as required. The year as an SIT allows the employee to do inspections, give advice, teach classes, and pursue compliance with the regulations, while under the direct supervision of a Registered Sanitarian. ||3. The current licensing process, under the Board of Sanitarians, is slow and expensive. The process needs to be more efficient and cost-effective. The fee is a burden to the workforce, which is already in a state of crisis. MEHA asks the Department to reconsider the licensure fee for Registered Sanitarians to 1) ensure the cost-savings from program administration is passed onto the workforce and 2) ensure that the Registered Sanitarian fees are no longer disproportionately higher than other professions. (For example, R.S. pay \$270 annually while licensed nutritionist pay \$75 every two years.) ||4. If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. Specifically, MEHA believes that it is important for sanitarian ethics to include a statement that unprofessional conduct includes the ""failure to uphold Montana laws, rules, and regulations pertaining to environmental and public health"" which is currently in the Board of Sanitarian rules in ARM 24.216.2301. This language would be an addition to the unprofessional conduct outlined in 37-1-308, MCA. ||5. The NEHA examination should continue to be the standard. ||The Montana Environmental Health Association supports changes that will lead to more efficient registration and oversight as long as Registered Sanitarians remain a professional position, with required education, knowledge (based on testing and continuing education), ethics, and licensure. ||

Please provide your first and last name Lisa Casper

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Unique ID: 1052233164  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a Sanitarian in Training the current system of the licensing board is an important structure, the proposed plan of changing to a board-less system will decrease the effectiveness of my training and remove the goal posts to become an RS. The removal of Registered Sanitarian and Sanitarian in training along with the basic requirements for that position is a reductionist move that increases the likelihood of mistakes being made by lower quality sanitarians. The position as a SIT or RS requires essential knowledge gained in higher learning institution and a lack of that basic knowledge will lead to mistakes being made when investigating foodborne illness outbreaks. These changes will also make it harder to higher qualified individuals from other states and current RS will lose chances for reciprocity to other states.

**Please provide your first and last name** Damion Lynn

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052233165  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hello, I appreciate the red tape initiative and believe many good things will come of it. I would like to bring to your attention the unintended consequences of the proposed repeals in the attached draft. I have attached the draft I am referencing for your convenience. If they are repealed I am concerned for the negative impact, wellbeing and safety of the public. Most people do not know or understand the complete role and scope of a licensed process server or the amount of work we do. Our profession was formed to help with the work load to the sheriffs depts allowing them to try and focus on their main job of public safety. We are required to be honest, ethical, impartial and licensed. To gain the license we are required to be fingerprinted have a background check, have insurance and maintain the required bonds. Those requirements are paramount to this profession. The current process for getting licensed with the state of Montana is clear and easy to follow. I will give a brief explanation of what we do and why it is so very important to be licensed. We do not only serve legal documents we execute writs of execution. What does that mean? We do things like - 1. Levy bank accounts 2. garnish wages 3. Seize property 4. Till taps- Walk into a business and have them open the till and take the funds out. We can also walk up to the person named in the court order and have them empty their pockets or purse and seize any funds on their person. 5. Seize state tax refunds. Those things are not voluntary, we have a court order and the funds are taken. We have MANY legal steps to follow but the funds are paid out to the proper parties and affidavits are filed with the court as to what happened with the funds and where those funds came from. We have many records of peoples home address, work places, bank accounts and SOCIAL SECURITY NUMBERS. The information we have should require licensure to help maintain the safety of the public. Right now if the MCA is repealed (there is nothing on the books to replace it or amend it), the only entity left to execute writs of execution is the Sheriffs dept. They are already overworked, short staffed and under paid. There is no legal way for the public to execute writs and form a business at this time with the current laws that will remain on the books after the repeal. The company I work for already handles ABOUT 2,200 SERVICES AND 6,600 WRITS THAT GENERATE AN AVERAGE OF 28,264 LEVIES AND 10,300 PAYMENTS A YEAR TO PROCESS. That is just one company in the state of MT, so please extrapolate those numbers as to what that would do to our sheriff depts across the state. It would also make our jobs obsolete, causing us to lose our jobs and the businesses that do this, to close their doors. If this profession is made to have no licensure, for serving papers as it would not pertain to writs of execution, it would be open to the public, No background checks or enforceable oversight would be there to protect the public. It will not create jobs, it will cause job loss and increase the risk to the public. It would inhibit the service of legal documents. It already can take the sheriff months to have time to serve a paper, serving papers is not their only duty. Protecting the public is their main concern and should be! We help collect funds for unpaid services. They are for small and large companies. Companies that would face going out of business due to lost funds. There is the possibility of interest rates increasing as the risk of loans will increase

if there is no timely way to collect due funds. The ramifications of this are wide reaching and very concerning. ||It would also tie up the court systems that are already overburdened with lawsuits do to unlawful service. ||The laws in place at this time work well and should be left alone. If not, then there needs to be many new laws written to protect the public and allow privatization of the business, not add to the sheriffs work load.

||<https://boards.bsd.dli.mt.gov/educational-sessions+>25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112,||If you would like to discuss this further please do not hesitate to contact me.||Thank you for your time,|Dany Lowry |Cell 406-459-3114|

Please provide your first and last name Danyelle Moore-Lowry

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Unique ID: 1052233166  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am writing in opposition to some of the proposed changes put forward in the draft bill SAN-Board-to-Program. Specifically, I would like express my strong and sincere agreement with the Montana Environmental Health Association's comments that:|1. The term ""Registered Sanitarian"" should be explicitly retained and continue to mean a sanitarian registered under 37-40-101. |2. The Sanitarian in Training (SIT) pathway is critical to supporting an individual in becoming a licensed Registered Sanitarian and critical to local government recruiting and retaining their environmental health workforce |3. The current licensing process, under the Board of Sanitarians, is slow and expensive. |4. If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. |5. The NEHA examination should continue to be the standard. ||Furthermore, as a Sanitarian-In-Training, I can personally attest that the removal of that position would greatly hinder the efforts of county/local health departments by increasing the workload upon a limited number of Registered Sanitarians and degrading the quality of service provided to Montana taxpayers, while simultaneously increasing wait times for inspections, permits, and services generally. Sanitarians-in-Training are currently authorized to perform a number of duties which other non-sanitarian positions are not authorized to perform. These duties, such as septic permit application site reviews and the issuing of permits, restaurant inspections, and public accommodation inspections are required for private citizens, developers, and businesses to proceed with planned projects and business operations. Decreasing the number of professionals authorized to perform these duties would significantly increase the timeframe for the performance of these duties, and would consequently hinder economic growth and job creation. These duties also provide SITs with valuable on-the-job training that ensures their qualification to operate as Registered Sanitarians. The Sanitarian-in-Training position provides incoming employees with a clear path forward to become Registered Sanitarians. Removing this category would greatly increase the difficulty of recruiting and hiring personnel to perform essential duties. The effort to increase government efficiency through the reduction of red tape is certainly admirable, but the changes proposed in the SAN-Board-to-Program, as written, would serve the opposite purpose. |

Please provide your first and last name Jacob Rubow

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Unique ID: 1052233167  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

1. The term "Registered Sanitarian" should be explicitly retained and continue to mean a sanitarian registered under 37-40-101. |2. The Sanitarian in Training (SIT) pathway is critical to supporting an individual in becoming a licensed Registered Sanitarian and critical to local government recruiting and retaining their environmental health workforce |3. The current licensing process, under the Board of Sanitarians, is slow and expensive. |4. If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. |5. The NEHA examination should continue to be the standard. ||I believe these are the minimum standards that should be continued to be upheld under either a Board or Program, in order to ensure a professional workforce that is compensated fairly for the knowledge and education required to perform the essential duties of maintaining a "clean and healthful environment" as required in the Montana Constitution.||I support the change to a program but also want to bring attention to the statutes that define Registered Sanitarian and the practice thereof: 37-40-101 MCA and the cross references in 76-4 MCA, 75-5 MCA, 50-50 MCA and other statutes. I have been a licensed and practicing RS in Montana since 2012 and feel strongly that the SIT program allows us to bring in new hires to the field in general and allow sufficient and less restrictive training time than NEHA, therefore leading to shorter onboarding to help counties sufficiently staff their offices. This also allows a person to become licensed and practice in Montana while continuing to pursue full REHS licensure through NEHA which then allows them multi-state license reciprocity. We will lose this under the proposed changes.||Thank you for your time on this matter.  
Brittney Krahn, R.S. License #1355

**Please provide your first and last name** Brittney Krahn

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Unique ID: 1052233168  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

1) 37-40-101 2 (a) is missing body art, body piercing and work camps as these are separate programs that are inspected and licensed by registered sanitarians in each county. Please be sure to add these as these are also requirements in the State Administrative Rules of Montana. || I am also curious if the food references should be more specific due to the passing of SB199 in Montana. || 2.) S.I.T requirements should stay in place someone who just started on the job does not have the training knowledge or skill to be a Registered Sanitarian. This is why both Sanitarian and Registered Sanitarian should be defined separately. The R.S. should only be received after passing the national exam given by NEHA and then receiving approval from the board. || 3) The NEHA examination should and must continue to be the standard in Montana to stay in alignment with other states. || 4) If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. |||

**Please provide your first and last name** Jera Samuelson

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IP Address:  
Unique ID: 1052233169  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

1. The term ""Registered Sanitarian"" should be explicitly retained and continue to mean a sanitarian registered under 37-40-101. |2. The Sanitarian in Training (SIT) pathway is critical to supporting an individual in becoming a licensed Registered Sanitarian and critical to local government recruiting and retaining their environmental health workforce |3. The current licensing process, under the Board of Sanitarians, is slow and expensive. |4. If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. |5. The NEHA examination should continue to be the standard. |

**Please provide your first and last name**

Nicholas Haskell

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

SAN board to program|-The Sanitarian in Training time period is a necessary step in becoming a qualified sanitarian. During this time period, people learn the education and experiences needed to be a professional and effective sanitarian. |-The NEHA examination needs to remain the standard as it is a national exam and sets the national standard. |-Body art, body piercing, and work camps are also some of the programs that are inspected by sanitarians. |-The term "registered sanitarian" is proposed to just be sanitarian, but a holder of a current certificate can have the initials "R.S." after their name? The term registered sanitarian is a term that is earned after meeting educational qualifications and passing the national NEHA exam. These credentials are important for our professional development and are a part of our work experience. The terms "registered sanitarian" and "sanitarian in training" are also referenced in other state regulations (ARMs and MCAs). |

**Please provide your first and last name** Mary Valenzuela

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Submission Time: December 30, 2022 5:02 pm  
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IP Address:  
Unique ID: 1052233171  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comments on Sanitarians Board to Program. || I have been a registered sanitarian for about 30 years, and now manage a number of sanitarians and sanitarians in training. I support the change that would move sanitarian licensing from the Board to the Department, but I have a few concerns with what is currently proposed: || 1. It is critical to maintain the concept of a Sanitarian in Training (SIT) in the law. 37-40-203, MCA currently gives the Board the authority to define the qualifications of an SIT. The current proposal does not transfer that authority to the Department, but needs to do just that. In addition, the definition of an SIT should be retained (Section 2, page 4 of the current proposal), as well as the concept that SITs can work for only one year as an SIT before having to register as a Sanitarian. I cannot express how important this is for recruitment and hiring. A sanitarian, or Environmental Health Specialist, is not a career many people have on their radars as they graduate from college. We need to be able to develop our workforce and recruit good, capable people through the SIT program. || 2. Retain the definition of a Registered Sanitarian (Section 2, page 4 of current proposal). Having this definition gives meaning to 37-40-302(4), which allows us to use the initials R.S. after our name. || 3. One of the things that would be lost without a Board are the ethic statements specific for our profession. 37-40-203, MCA is proposed for deletion. Please give the Department the ability to adopt rules addressing unprofessional conduct specifically for sanitarians and sanitarians in training, that would be in addition to those already listed for programs under 37-1-308. || I appreciate the opportunity to comment on this legislative proposal.

**Please provide your first and last name** Shannon Therriault

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

A sanitarian must start as an SIT as they do not have the knowledge and training to properly perform inspections and provide information to the public as well as the operators. The time as a sanitarian in training is essential to obtaining on the job training as well as time to study for the national test. ||A sanitarian to become an RS must pass and a national exam provided by NEHA as well as be approved by the board of sanitarians. This is essential in ensuring that all registered sanitarians are trained and have the knowledge to provide public safety and maintain national standards. ||The NEHA examination needs to continue to be the standard in order to becoming a registered sanitarian. ||The term registered sanitarian and sanitarian in training are also listed in other state regulations such as the ARMs and MCAs. ||Body Art, Body Piercing, and Work Camps are not listed under the job description suggested. These are establishments that are inspected yearly by sanitarians, These inspections are essential in protecting the public health.

**Please provide your first and last name** Frankie Nelson

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052233173  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

In response to Draft 10/30/22, Version 1, repeal of Medication Aids. This Draft is a hazard to the ever-growing population of the elderly dependent population in the state of Montana. The Medication Aids are trained and tested and are required to demonstrate competence. The state of Montana is experiencing the largest population of dependent elders in our history with ever increasing punitive actions by our legislators and now by our own State Board of Nursing. The current attrition rate is approximately 550 nurses per Annum, whether by retirement, advancement, or just finding other career paths. Nursing is a very hard job, that is under paid, underappreciated, and by and large we serve a population of clientele that are entitled and unrealistic in their expectations of healthcare. in the last 45 years, the population of Butte, Mt has gone from 72, 000 to 34,000, with the largest generations being the Baby Boomers, who are anywhere from beginning retirement to fully retired with significant health problems. We are replacing the nurses that retire at a rate of about 120 nurses per year with the graduating classes throughout the state, which is less than 25% of the annual attrition rate. Now you want to consider cutting the only lifeline we have to meet the needs of these patients but repealing the Medication aids? I assume that there are a few old RNs that are holding onto a lost ideal of only believing that students that learned the exact same things in the exact same traditional way are qualified, because they feel threatened that the world is changing and so is Healthcare. Many RN's in this state haven't even worked in long-term care and are woefully misinformed about the level of skill required by a nurse to manage care and medications for 20 - 50 residents with chronic comorbidities, while supervising CNAs and performing a variety of skilled cares including tube feedings, IV medication administration, wound care, physical assessment, communicating with families and contractors, post- op rehab nursing and collaboration with a multitude of specialized disciplines, and 4-5 hours on of preparing and administering medications. The Medication Aids have finally given us the opportunity to better meet the needs of a sicker population of elderly post-COVID. This takes 4-5 hours of popping out medications from bubble packed and labelled cards off the nurses that can now perform actual nursing assessments, treatments and care. The Medication Aids allow everyone to be able to perform quality healthcare delivery based on their knowledge base and skill level and give individualized attention to each of the residents in our care. Take an actual walking tour of a long-term facility, ask the questions that need to be asked, consider how soon you yourself will be relying on our Healthcare System to meet your long-term needs. What kind of care do you want?

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**Please provide your first and last name** April Angove

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Unique ID: 1052233174  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please remove 37-33-402 from Title 37 Reform Section 216 that repeals the statute||I oppose repeal of 37-33-402 because||Massage therapy is a healthcare profession and deserves that recognition in state law. Also it is known nationwide that massage therapists are considered allied healthcare professionals who receive prescriptions from physicians, chiropractors, physical therapists, along with other medical professionals. ||I personally receive a significant portion of my income from these referrals as I am a professional massage therapist for our Veterans and could not have become a provider for them through Triwest Health Care Alliance if I was not a professional in Healthcare as a Massage therapist .||Deletion of the title ""healthcare professional"" would not only discourage reimbursement from medical professionals and insurance companies but would also not be ethically honest to the true status of the massage therapists as a healthcare provider.||Personally I see no room for massage as ""adult entertainment"" and it should not be allowed at all as a guise for someone to prostitute themselves. It should only have a place in the therapeutic healthcare realm. Why anyone would make room for ""adult entertainment"" as a public business is beyond logic to me. Would anyone reading this far really want or encourage there children to pursue a job in ""adult entertainment""? Are we as adults who I hope are against the trafficking and prostituting of our children really wanting to push more business under this title ""adult entertainment"" and make the trafficking of the innocent even easier to happen. This doesn't make sense to me and at a personal level I have a big problem with what is being proposed. |Sincerely,||Douglas Bradley|

**Please provide your first and last name** Douglas Bradley

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Unique ID: 1052233175  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comment on SAN-Board-to-Program. ||This proposal is short sighted. While there are certainly opportunities to improve the Board responsiveness and reduce fees (to be clear, I'm not opposed to dissolution of the board), the wholesale elimination of the Board rules and the SIT credential/opportunity will hurt this profession. My most significant concern is the ramifications of eliminating the Board authority to create minimum standards for new sanitarians without transferring that authority and obligation to the Department. This rule is currently in 37-40-203. This is a broad and complex job, and a foundation of education and experience in similar subjects is essential to maintaining credibility and minimum environmental standards. Lastly, I have a strong belief that every licensed professional.in MT should be accountable to transparent and upheld ethics standards. It is unclear where an ethical question would be reviewed and potential license actions taken if a sanitarian we're found to be unethical.

**Please provide your first and last name** Jeanna Miller

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233176  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Dear BSD, I am a Registered Sanitarian (RS) having been in the Environmental Health field for over 6 years working in 3 different MT Counties after leaving academia. Currently the RS field is struggling to keep and hire qualified individuals. There are several factors the main of which is the low, non-competitive salaries (e.g., approximate starting hourly rate in the low \$20s - NOTE: food workers can start at \$20-22 and get free meals - and peaking at under \$30 per hour. Another factor related to attracting and keeping qualified individuals which is currently proposed to be eliminated is the SIT (Sanitarian In Training) provision. The SIT program should not be eliminated. Again, the SIT certification should not be eliminated. The SIT provides a way for departments to hire and train a person on the job allowing department work to successfully be completed while also enabling a mentorship type opportunity. For many departments, especially those in small counties, this enables builders to continue building houses (e.g., septic system review and approvals are part if an RS and SITs work), new businesses yo be inspected and approved and licensed to operate ( in Retail Food, Public Accommodations, food Manufacturing, Swimming Pools and Spas, Trailercourts & Campgrounds, Body Arts, School and Day Care kitchens, etc.). Please continue and keep the SIT provision for attracting and training future RS's. |Cheryl Juergens, PhD, RS

**Please provide your first and last name** Cheryl Juergens, PhD, RS

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233177  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Regarding the bill for an act entitled: "An Act amending the sanitarian licensing statutes amending section 37-1-401, |37-40-101, 37-40-302, and 37-40-312, MCA; repealing sections 2-15-1751, 37-40-201, 37-40-202, and |37-40-203, MCA.": ||Sanitarians provide the foundational services that separate our developed world from that of developing third world nations: ensuring safe food to eat and disposing of wastewater properly. Advances in wastewater treatment especially are to thank for our ability to live densely without fear of rampant disease outbreaks. Eliminating licensure of the sanitarian profession jeopardizes the basic expectations we all have that when we enjoy a meal out, we won't have a terrible sickness the next day; or when everyone flushes their toilets, the waste doesn't end up in our drinking water wells. Requiring licensure of this profession is critical. I agree that the management of the licensure could be more efficient. However, the answer is not to eliminate the licensing process altogether. The designation of a "Registered Sanitarian" should be retained, and the NEHA REHS/RS examination should be the minimum standard to obtain that license, as well as specific education requirements. Further, eliminating the "Sanitarian in Training" designation would be devastating to most counties, especially smaller/rural counties.

**Please provide your first and last name** Valerie Stacey

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233178  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Dear BSD and Department of Labor, I am a Registered Sanitarian (RS) having been in the Environmental Health field for over 6 years working in 3 different MT Counties after leaving academia. Currently the RS field is struggling to keep and hire qualified individuals. There are several factors the main of which is the low, non-competitive salaries (e.g., approximate starting hourly rate in the low \$20s - NOTE: food workers can start at \$20-22 and get free meals - and peaking at under \$30 per hour. Another factor related to attracting and keeping qualified individuals which is currently proposed to be eliminated is the SIT (Sanitarian In Training) provision. The SIT program should not be eliminated. Again, the SIT certification should not be eliminated. The SIT provides a way for departments to hire and train a person on the job allowing department work to successfully be completed while also enabling a mentorship type opportunity. For many departments, especially those in small counties, this enables builders to continue building houses (e.g., septic system review and approvals are part if an RS and SITs work), new businesses yo be inspected and approved and licensed to operate ( in Retail Food, Public Accommodations, food Manufacturing, Swimming Pools and Spas, Trailercourts & Campgrounds, Body Arts, School and Day Care kitchens, etc.). Please continue and keep the SIT provision for attracting and training future RS's. |Cheryl Juergens, PhD, RS

**Please provide your first and last name** Cheryl Juergens

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233179  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

|1. The term ""Registered Sanitarian"" should be explicitly retained and continue to mean a sanitarian registered under 37-40-101. |2. The Sanitarian in Training (SIT) pathway is critical to supporting an individual in becoming a licensed Registered Sanitarian and critical to local government recruiting and retaining their environmental health workforce |3. The current licensing process, under the Board of Sanitarians, is slow and expensive. |4. If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. |5. The NEHA examination should continue to be the standard. |

**Please provide your first and last name**

Kira Flagstead

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233180  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Private security bill- |Please see MCA 25-13-401. It requires the Sheriff or a levy officer to execute writs. A Levy officer is a process server. If you repeal 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112. That removes process servers as levy agents. Thus leaving only the sheriffs dept to execute writs of execution. The only way to fix that is to remove the repeals or make many new laws to oversee that aspect. |If there is a plan to allow an entity to execute writs - other than the sheriffs dept- please let me know. Otherwise, there will be a heck of a mess in the courts and major JOB LOSS with danger to the well being of the public. |I noticed that I get no response by email or phone call and none of my comments have been logged to the excel sheet noting that the comments have been noted.

**Please provide your first and last name** Dany Lowry

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233181  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

""An Act amending the|sanitarian licensing statutes amending section 37-1-401,|37-40-101, 37-40-302, and 37-40-312, MCA; repealing|sections 2-15-1751, 37-40-201, 37-40-202, and 37-40-203,|MCA.""|Pg. 4 I do not agree with the decision to change the job title of a registered sanitarian to sanitarian. It diminishes the training and work they have done to provide the public with their knowledge and expertise. Also, the training period for sanitarian workers is crucial in their learning process and ensuring they learn the necessary processes and policies. ||I believe the registered sanitarians should continue to use the national exam from NEHA as they set the national standards that should be followed by all registered sanitarians. I agree with MEHA's comments on this matter and hope you take my request and theirs into consideration.

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**Please provide your first and last name** Kalyn Brown

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233182  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

DRAFT: Version 1 - Sanitarians Board to Program||The proposed changes listed in this draft are ignorant and harmful to the health of the community. The proposed changes would lower not only the requirements but expectation of sanitarians within the community, risking for an unqualified sanitarian to make errors while performing their job. These errors could lead to substantial consequences including the safety and health of the community. ||The term ""Registered Sanitarian"" should be explicitly retained and continue to mean a sanitarian registered under 37-40-101. ||The Sanitarian in Training (SIT) pathway is critical to supporting an individual in becoming a licensed Registered Sanitarian and critical to local government recruiting and retaining their environmental health workforce ||The current licensing process, under the Board of Sanitarians, is slow and expensive. ||If the Board of Sanitarians is eliminated, the Department needs the authority to adopt additional unprofessional conduct statements for sanitarians. ||The NEHA examination should continue to be the standard.||Whoever proposed these changes probably doesn't wash their hands after using the bathroom.

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**Please provide your first and last name** KaeLee Massey

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233183  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Member of the public

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

The removal of ""Registered Sanitarian"" from 37-40-101 would be a detriment to public health and safety, in that it would undermined the value of the experience and education which being a registered sanitarian entails. The term ""Registered Sanitarian"" should be retained. Additionally, under 37-40-101 the removal of the Sanitarian in Training pathway would be a detriment to public health and safety, in that individuals who do not have the experience and education required to properly preform their workplace duties would have no way to obtain the Sanitarian Registration which would give them those tools. Furthermore, the removal of the ""Registered Sanitarian"" and Sanitarian in Training pathway would make recruiting and retaining staff exponentially difficult, as these terms and training process are nationally recognized, removing them would ostracize Montana and this isolationism will not benefit the public or the licensees.

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**Please provide your first and last name** Miranda Hoffman

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Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233184  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Employed by Environmental Health

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

San Board to Program. I am not a sanitarian, but have worked for the county Environmental Health Dept for 28+ years. The services provided by this department are critical for protecting our citizens and our environment. I believe it is very important to implement and maintain clear rules governing the profession. Recruitment has always been a challenge. The Sanitarian-In-Training option provides a path for individuals new to the profession to secure a job and receive crucial on-the-job training that prepares them for the exam and becoming a Registered Sanitarian. Without this option, the workforce pool would be even smaller. This would be a good time to evaluate and modify the definition of a Sanitarian, Sanitarian-In-Training, and add an Environmental Health Technician definition. There are a number of duties a technician could perform (i.e. groundwater monitoring, explaining COSA and septic approvals, establishment plan review process, etc.) that would alleviate the workload on the Registered Sanitarians. Clarifying the definitions would give this latitude. Many people do not understand what services a Sanitarian provides. It is the Department of Labor & Industries responsibility and duty to ensure that we have highly competent, qualified individuals in the profession to provide the citizens, taxpayers of Montana these services that protect them and the environment.

**Please provide your first and last name** Theresa Severeid

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233185  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

While moving Sanitarian licensing to a program vs a board has potential advantages such as reducing the time to process applications and reduced license fees, there are disadvantages that will adversely affect the public. ||Currently, the Board is composed of 5 members, 3 of which are Registered Sanitarians. These members understand the role of a Sanitarian as well as the importance of having educational and ethical standards. Moving to a program overseen by DLI staff will result in applications being reviewed by people who don't fully understand the profession. Being on the Board I have seen many transcripts with courses that initially appear to meet the educational requirements but upon further review do not. As the current Board Chair I often receive emails from DLI staff to help them determine if a course meets the requirements. Without a Board who will they go to?||Ethics complaints will have no Sanitarian input without a Board. Complaints will be reviewed by staff not familiar with the profession and they will not understand if the complaint is valid or not.||Areas of environmental health involve critical issues of public health, business and property development, as well as individual concerns. Professional licensing is intended to protect the public's health and safety. If the requirements for licensing aren't properly vetted, inconsistencies will occur with how the laws are applied, without recourse available to the public. It's important that the citizens of Montana have recourse if they believe they've been treated unfairly. ||In my opinion, there needs to be, at least, an advisory council for professional oversight, rather than relying on DLI staff. ||

**Please provide your first and last name** Megan Bullock

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233186  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Employer

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

37-7-308 and 37-7-703 require a pharmacy to prepare a utilization plan for technician and auxiliary services, submit the plan to the Board, and to keep the plan on file at the pharmacy. Only the state of WA also requires such a plan. CVS Health sees no benefit to public safety from preparing a utilization plan, and we believe this process places a burden upon pharmacies and the Board. As 96% of the States in the US do not require such a utilization plan, we believe the striking of this requirement is in line with the goals of a red tape reduction effort. |37-7-302 (a) requires the Board to approve accredited colleges or schools of pharmacy. The requirement in most states is for a licensee applicant to have graduated from an accredited or school of pharmacy, without having to burden the Board with approving each and every accredited school or college of pharmacy. We believe striking this Board burden is in line with the goals of a red tape reduction effort. |37-201(4) (l) strikes the requirement for the Board to promulgate rules to regulate the minimum standards for pharmacy internships, however 37-7-302 (b) requires the Board to establish these same internship requirements. Internship requirements are inherent within programs accredited at schools or colleges of pharmacy. You cannot graduate from an accredited school or college of pharmacy without achieving 1740 hours. Therefore, we suggest consistency in striking this requirement from 37-7-302(b), thus removing this burden from the Board of Pharmacy. ||

**Please provide your first and last name** Mark Johnston

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233187  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Other: Employer

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

37-7-308 and 37-7-703 require a pharmacy to prepare a utilization plan for technician and auxiliary services, submit the plan to the Board, and to keep the plan on file at the pharmacy. Only the state of WA also requires such a plan. CVS Health sees no benefit to public safety from preparing a utilization plan, and we believe this process places a burden upon pharmacies and the Board. As 96% of the States in the US do not require such a utilization plan, we believe the striking of this requirement is in line with the goals of a red tape reduction effort. [37-7-302 (a) requires the Board to approve accredited colleges or schools of pharmacy. The requirement in most states is for a licensee applicant to have graduated from an accredited or school of pharmacy, without having to burden the Board with approving each and every accredited school or college of pharmacy. We believe striking this Board burden is in line with the goals of a red tape reduction effort. [37-201(4) (l) strikes the requirement for the Board to promulgate rules to regulate the minimum standards for pharmacy internships, however 37-7-302 (b) requires the Board to establish these same internship requirements. Internship requirements are inherent within programs accredited at schools or colleges of pharmacy. You cannot graduate from an accredited school or college of pharmacy without achieving 1740 hours. Therefore, we suggest consistency in striking this requirement from 37-7-302(b), thus removing this burden from the Board of Pharmacy. ||

**Please provide your first and last name** Mark Johnston

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233188  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Director or member of an association connected with a licensed profession

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

These comments are related to the changes proposed for Section 37-40 SAN board to program. I oppose the elimination of the term registered sanitarian on page 3 as this term makes it clear the definition of a sanitarian that is licensed in the state. I also oppose the changes to the definition of sanitarian on page 4 to eliminate the qualifications needed to be a sanitarian. Sanitarians require a broad base of knowledge and training to conduct their work in a professional manner to protect public health. I am deeply opposed to striking the Sanitarian in Training definition on page 4. This position allows individuals to gain the knowledge necessary to be able to practice as a sanitarian under the guidance of a registered sanitarian. This will make the hiring of new sanitarians for counties almost impossible as few individuals come into the field with the training necessary to qualify as a sanitarian. There is usually a one year training period for individuals entering the field. The current language within the draft uses the following terms: license, registration, certificate. The license should be referred to as such and do not use alternative terms for the license such as certificate. If the Board of Sanitarians is eliminated, the department must have the authority to adopt additional unprofessional conduct statements for sanitarians that are specific to the job and not incorporated elsewhere in the legislation. Some of these are outlined in rule. It is very important to set and uphold the standards for sanitarians. The current requirement of the NEHA examination is important and should be continued to be used. The recognition of the national environmental health specialist credential should be used for licensing new sanitarians while providing a way for currently registered sanitarians to maintain their licenses. It is important to maintain the integrity of the license, reflecting that those licensed are professionals with the required education, knowledge (demonstrated by testing and continuing education), and ethics. The department has not provided any information on the proposed cost savings for sanitarians with these changes or the return of board funds to sanitarians if the board is dissolved. This additional information would be helpful. These comments are made from my personal opinion and do not necessarily represent the views of my employer.

**Please provide your first and last name** Nina Heinzinger

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233189  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I Oppose the bill to Title 37; Specifically, these statutes: 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112 as they are in place for a reason, and they work well. Taking away the license for a process server could enable the public to nefarious individuals acting as a process server and levying officer. We have to take a test, take federal background checks, and know the statutes and how to operate. Taking all of these safety measures is at the utmost importance to keep the public of Montana citizens safe. Delicensing could possibly mean a shift away from process servers serving levies and withholding money, to not only let a random person do this, but also be a burden to the sheriff's department. They are already over worked and understaffed. Staffing the sheriff's office would become another burden as it is already hard enough to find employees. This could also move towards higher taxes to pay for these new employees for each county. That is not fair to the citizens of Montana. The sheriff's office also charges large fees to the consumer, that will just add to the debt the consumer already has to pay. ||I'm sure this was not the intention of the Red Tape Initiative to delicense, but there is also the scenario of putting small businesses out of business due to this delicensing. There are several small businesses that serve process and are levying agents. The fact that there aren't many licenses given out or active right now is a good thing. We need this in place just like a sheriff and lawyers need to be trained and licensed in their profession. ||There is no good scenario of delicensing process servers and levying officers. It leaves too much room for failure and the ability to scam another person. How does this help Montanans? It doesn't. Please do not move forward with the delicensing off process servers. ||Thank you for your consideration.

**Please provide your first and last name** Cassie Koch

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233190  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Hi, |I can't comment on the page or section because I can't find it! That's my whole point. I am a veterinarian in the state and occasionally need to reference the Veterinary Practice Act. Unfortunately, it's not in just one place, tiny pieces of it are on dozens of webpages. And very frustratingly, a lot of the links don't even lead to anything. Please put it all on one page.|Thanks for your consideration.

**Please provide your first and last name**

Heather Toyne

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233191  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comments are in reference to: ||Draft for Public Comment Ver. 1 - 10/27-2022 - SAN board to program|| comment as a Registered Sanitarian with over 20 years of experience working in Montana and many years prior experience in other states working in the food service and outfitting industries prior to becoming an R.S. |My biggest concern reflects the most common concern described in the survey results, which is that without having a Board of peers to oversee the profession, that professional standards can not be fairly upheld. Also as mentioned in the survey results, I have concern that by doing away with the Board and Registration similar to other states, Montana will become noncompetitive in its hiring ability. Registered sanitarians, in addition to reducing disease in their communities through their work with licensed facilities and wastewater permitting, are a huge resource for business owners and individuals. By having experienced, highly professional sanitarians available to our businesses and people, it helps Montana be more competitive on a national and international scale. I do not agree with lowering the standards for any profession in Montana to something lower than what it is in other states in the country, and the standard for a sanitarian is to be a Registered Sanitarian or Registered Environmental Health Specialist. I chose not to license through NEHA when I became an RS but rather through MTDOL and the Board of Sanitarians because I believed in Montana's professional standards. I don't want to see this compromised. Registered Sanitarians have a great degree of credibility with business operators, and as I mentioned, we are a huge resource. No one wants to compromise this. I also notice that operators were not surveyed. I doubt that business owners would want to lower the standards of licensing or professional conduct on the sanitarians who inspect their businesses. A Board of our peers who understand the profession are needed to oversee others in the profession and to uphold the high standards that we enjoy here in Montana.

**Please provide your first and last name** Laura Hendley

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233192  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Opposing:|Bill Title 37 Version 1 - Private Security Board to Program|The bill draft in Section 15 repeals the following sections of Montana Code: 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112, 37-60-201, 37-60-211, 37-60-302 and 37-60-309.|The elimination of a registered process server removes the authority to serve process and execute writs in a private process service manner. This will remove checks and balances and will only harm the public. This will put small businesses out of business that serve in the private sector. The loss of jobs across the entire state is more than the licensed process servers that will be affected. |Please do not repeal these statutes nor de-license process servers. It will be a disservice to the public and the greater good of Montanans.

**Please provide your first and last name** Cassie Koch

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233193  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Please consider renaming Clinical Laboratory Scientist to Medical Laboratory Scientists as this is old and outdated language.

**Please provide your first and last name**

Cara Bushmaker

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233194  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I do think midwives in Montana should be CPM status. I also think there should be at least 3 licensed homebirth midwives on the board.

**Please provide your first and last name**

Averee Chifamba

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Submission Time: December 30, 2022 5:02 pm  
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Unique ID: 1052233195  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current Montana Professional Licensing Board Member

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

As a registered and licensed process server in this state for the past 27 years I am extremely concerned about the proposed repeals listed on page 1 of the Draft for Public Comment. From what I understand the bill draft eliminates licensure for process servers and that as a result process servers would no longer be considered a "registered process server" and, consequently, under Title 25 of the Montana Code are not permitted to serve process or writs. The bill draft in Section 15 repeals the following sections of Montana Code: 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112, 37-60-201, 37-60-211, 37-60-302 and 37-60-309. These repeals have the effect of removing the authorization of process servers to serve more than ten times in a calendar year any papers in Montana. I became a process server in 1995 and started my business along with a partner. He passed away in 1998, but I chose to keep going with the business and have been successful in building it for the past 25 years based on serving papers upon individuals AND by levying writs of execution upon wages, bank accounts and state tax returns. The business has been built on process serving AND levying for over 25 years. We serve hundreds of papers each year and THOUSANDS of levies. We are fully bonded up to the amount of the writs of execution we serve and have had the same clients since 1997. MCA § 25-1-1101 through § 25-1-1112 contain the current registration and bonding requirements for Montana Process Servers. These sections are proposed to be repealed in the bill draft. If these are repealed there would be no registration process for process servers in Montana. Montana Code currently requires a process server to be registered to be considered an officer authorized to serve "process" which includes "all writs, warrants, summonses, and orders of courts of justice or judicial officers." MCA § 25-3-101; MCA § 25-3-201 through 25-3-204 provide the authorization for service of process and define the duties of those who serve process. All these statutes refer to private process server as a "registered process server." Eliminating the registration process removes the authority granted by this series of statutes which permit private process service. Furthermore, to be considered a public servant for the purpose of the crime of obstructing a public servant the process server must be registered under Title 37, Subchapter 60 of the Montana Code. MCA § 25-3-105. MCA § 25-3-302 authorizes return of service by a "registered process server" and provides that the return is court documented evidence of service. Without the registration process, private process servers would no longer have the authority to serve process granted by MCA § 25-3-201 - 204, nor would any of the other statutes cited above have effect. I have listened to the recordings of the Board of Private Security meetings back to 12-10-2021 when the idea of what to do with process servers was first brought up. If you listen to those board meetings in their entirety process servers are mentioned a handful of times as far as removing the profession from the Board of Private Security and forming a 'workgroup' to regulate the profession. This workgroup idea was discussed in the 1-27-22 meeting. Darren Bayless and Charles Pesola were asked to collaborate and come back to the board with an idea how to move process servers to another board or workgroup. In the next meeting, on 5-19-22, nothing was mentioned again regarding process servers or the

workgroup. The next meeting mentioned was scheduled for 9-22-22, however, there is no listing for that meeting on the Board of Private Security site, no agenda, no minutes, and no recording. It is interesting how the subject was just dropped and the next thing that happened was the Draft for Public Comment with the proposed repealing of all the above-mentioned statutes. |One last thing that is particularly important to change or amend before it heads to the legislature is the Unofficial Draft Copy of LC 0394. If you look on page 28, line 20, the line reads a licensed one private investigator or a registered process server (in the actual wording on page 28 registered process server is struck though) and one public member. If we are still to be licensed by this board for the time being, registered process server should not be struck through. The new board/program will only consist of seven members from a security company, one electronic security company, one city police chief, one county sheriff, one member of the Montana public safety officer standards and training council: and one private investigator. My question is why wouldn't law allow a process server and levying officer to be appointed to the board as an SME? Contrary to widespread belief that all a process server does is deliver papers, I will testify there is much more to it than just that. Process serving and levying is a specialized field with many intricacies on the levying side of the business and it is a very misunderstood profession. Upon listening to the board meetings from the past year I gathered that none of the board members really have a good understanding of what a process server and levying officer does. Throughout the last listening session Dave Cook stressed that point multiple times and how important SME's are to this entire process. The board members are supposed to be subject matter experts on the occupation they are governing as board members. I would be very curious to know if there has ever been a process server/levying officer on the board in addition to a private investigator. The two professions are vastly different in many ways. I would definitely consider myself an expert on the subject of process serving and levying as I have been doing it for 27 years. If you would like to discuss any of this further, please feel free to contact me anytime. |I'm trying to keep this comment as short as possible so I will stop here. I will also be emailing letters to several other parties with more of my concerns and ideas. Thank you for the opportunity to comment on this matter. |Roxene Cook|Process Server/Levying Officer|LGDI, Inc. |

Please provide your first and last name Roxene Cook

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Unique ID: 1052233196  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I call for interstate compact laws to be established for Montana, along with the other states that are participating, in order to give access to more patients to receive care. Allowing this for Montana providers would allow them to provide care to individuals as the transfer to other states--especially those like traveling nurses or military spouses, who move a lot and this makes it difficult for them to repeatedly reestablish care every few months, when they could remain with the same provider and accomplish so much more in their treatment. It would also allow those other states in the compact to provide care for Montanan's that are not able to get in with providers in their area or to work with specialists that they otherwise may not be able to get in with. Please, please, consider enacting this policy for health care providers--especially mental health counselors to practice across state lines and continue with patients they have established care with.

**Please provide your first and last name** Michelle Burkhart

Form Name: Comment Submissions - COPY  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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A direct patient care department should never have board removal unless the approved program is of the same quality. Clinical Laboratory Science testing is responsible for 70% of a providers' medical decision. We do not have one specialty we cover multiple specialties including blood smear screening for leukemia, troponin testing for MIs, Glucose testing for diabetics, susceptibility testing for your antibiotics to ensure proper choices, and compatibility testing of FDA regulated blood products to patients. Section 25. Section 2-15-1753 has removed the set board of 4 licensees and been replaced with ALL licensees as subject matter experts. A new graduate does not have the experience or knowledge to understand adjudication and screening processes. Our board should be maintained until the time we can agree on an adequate program structure that does not compromise the safety of EVERY patient in Montana. I would wager that everyone you know has had a laboratory test done. This is a high risk profession and is successful because we maintain high standards like that of our current licensing board makeup.

**Please provide your first and last name** Cara Bushmaker

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Unique ID: 1052233198  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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Version 1 - repeal of Medication Aide||I am commenting to support continuing the medication aide program. Our facility currently utilizes medication aide II in Montana and there are an abundance of benefits to this program.||They are skilled professionals many who have been working in the long term/skilled spectrum for years and are not looking at going further in health care this is their career goal and they achieve it. Career progression and ladders in facilities are amazing and helps with the overall self evaluation of ones continuing in their career as well as feeling valued that as leaders we see the growth and aspirations that they theirselves are wanting to move toward in their career. ||They are the most dedicated individuals with passing medication, the medication error rate is extremely low as they are diligent at being sure every order matches their medication record to the label before administering. If an order is different than the medication label they address with the nurse, if the order has changed and a dose needs to be removed or added it is the nurse that has to make this happen. Any medication such as PRN pain medication the medication aide reports this to the nurse and the nurse has the time to spend with the resident to assess the pain and put interventions in place as well as the nurse administering the PRN medication and monitoring the efficacy of the medication.||When using medication aides in long term care it frees up the nurse to provide other services to the residents she/he is caring for such as wound care, compassionate bed side nursing, educating families and residents on their loved ones plan of care. Communicating with other health care providers for great continuity of care.||With the changes in staffing due to the pandemic as well as burnout due to these challenges and we know we will see this get worse before it gets better we need to put other levels of health care providers in place to assist with the overall wellbeing of each and every one of our residents. This will allow us to provide the care and services to achieve the best outcomes.||They are the ones who take ownership and accountability for their medication cart. Ensuring expired or outdated medications are removed and discussed with the licensed nurse on the unit for the nurse to destroy. They also, ensure medications are dated when opened such as our insulins and items that only have a brief time to be out of the refrigerator. ||Having medication aides in our facilities does not alleviate the need for a licensed nurse in our facilities it actually enhances the resident/patient overall experience. If we remove the medication aide our licensed nurses do become overwhelmed with the morning medication pass as again due to guidelines we have an hour before to an hour after to administer these medications. Well if you have higher priorities during that time such as new onset chest pain, or a fall or any change in condition it can put you significantly behind as well as residents being upset because they are not getting their medications on time or when they are used to getting them. When the nurse is behind with her medication pass she/he becomes anxious because they then feel they are not getting their job done or adhering to the residents' daily routine that they are accustomed too. Again causing burn out in licensed staff too many regulatory demands and taking good interventions away for nursing such as the medication aide.||Currently at our facility we are promoting the use of the medication aide. We currently have four medication aides, one

who just finished her class, one who is currently taking the class and four who enrolled. What will this do for our future well again by having the medication aide to pass the scheduled medications it gives the licensed nurse the time to assess and evaluate their residents with changes in condition or other needs that come up at any given time in the day. Gives them the time to use critical thinking skills when communicating with other health care providers.||Another great aspect of the medication aide, is they are aides too so they will take the time along the way to assist with ADL's and other tasks which again helps the resident and the team as a whole.||I do feel strongly that removing the medication aide from long term/skilled nursing would be a disservice to the health care system and will lead to further burn out to nurses on the units. Keep them in place and allow our residents to receive the best care and services that we can provide for positive outcomes.||

Please provide your first and last name Lisa Gandolfi

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Unique ID: 1052233199  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

RE: Unofficial Draft Copy LC 394; Page 28; Line 21 (g)(f) -one private investigator. |WHY: The proposed legislation strikes out any representation from a registered process server/levying officer. The job duties of a private investigator and a registered process server/levying officer are very different. If LICENSEE'S = SME'S the program NEEDS have subject matter expertise from a registered process server/levying officer. The current Board of Private Security has had the same private investigator representing PI's and process servers for the past 8+ years. Currently that representative does not have an active PI License. License #PSP-PI-LIC-12705, expired 3/1/2022. I've listened to the past year of board meetings and it appears the individual has not educated the current board on the duties and complexities of the job of a levying officer that go along with being a process server. If the process server/levying officer profession is to be licensed, regulated and complied with and have a disciplinary process, the profession needs to have an advisor and an SME with an active license.|WHAT: Line 21 should be amended to read (f) a licensed private investigator; Line 22 (g) a licensed process server/levying officer: Line 23 (g) one public member.|

**Please provide your first and last name** Roxene Cook

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am a current and past member of the Board of Dentistry. I am an Oral and Maxillofacial Surgeon and have a unique knowledge of the Anesthesia issues the Board has to deal with to help keep the public safe when sedation or anesthesia is administered to the public. I fail to see how the reduction of the actual number of individuals on the Board of Dentistry will meet the Governor's directive to reduce the "Red Tape" in the area of Professional Licensing. I believe the current number of Board Members does allow for discussion of the issues before the Board and the reduction of the number of personnel would hamper the actions of the Board and potentially deny the public the protection that this Board could provide. I am in opposition of the number of Board members and the makeup of the Board.

**Please provide your first and last name** Paul Sims

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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It is good to streamline such as reducing delay as a result of fingerprint searches. It is also good to make it easier for social workers to become licensed using credentials from other similar states. ||Please make sure that streamlining does not reduce licensees' accountability or qualifications.

**Please provide your first and last name**

Cynthia Garthwait

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Submission Time: December 30, 2022 5:02 pm  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I am writing to express my concern with the proposed changes to the Board of Private Security. As a current board member and Licensed Security Officer along with having over 16 years of Law Enforcement Officer i can truly say I am shocked that the idea of even eliminating the board shocks me. No only by doing this are you putting the safety and security of the public in jeopardy, you will be adding a large work load onto the current shorts handed state employee's. |As a board member I believe that the work we do in impermeable to the success of public safely and making sure the population of security Officers, Resident Managers, and contract and Proprietary Security. The board was able to view a complaint or a violation as a group and get the input from the board members and make a educated decision regarding the mater. By removing this board and putting it in to the hands of a State employee the experience and wealth of knowledge the board has would not be present in the sate overseeing these. This is a key thing the board is able to deal with as they review the non- traditional licensees and complaints. |I hope that this help you realize how imperative the Board of Private Security is to the Sate of Montana along with the safety and security of Montana residents.

**Please provide your first and last name** Darren Bayliss

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Unique ID: 1052233203  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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||December 13, 2022||David Cook|Montana Department of Labor and Industry|P.O. Box 1728|Helena, MT 59624||RE: Montana Department of Labor and Industry Title 37 Reform||Dear Mr. Cook:||On behalf of the American Speech-Language-Hearing Association, I write to recommend amendments to the proposed Title 37 Reform impacting the professions of audiology, speech-language pathology, audiology assistants, and speech-language pathology assistants.||The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 223,000 members and affiliates who are audiologists; speech-language pathologists (SLPs); speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 590 ASHA members reside in Montana. ||Following are ASHA's comments and recommendations for the proposed Title 37 Reform.||For Section 85, 37-15-103, (5), Exemptions, ASHA recommends retaining this language because it allows ease of practice for very limited periods of time by audiologists and SLPs licensed in other states. This language is commonly seen in many licensure laws throughout the country. In addition, ensuring flexibility to accessing care has been particularly important during the COVID-19 related public health emergencies and continues to be a need for patients, clients, and students who remain more mobile than they were several years ago and wish to have the option to retain the services of their practitioners while they are traveling.||For SLPs to be licensed in Montana, they must not only obtain a master's degree and pass the Praxis exam, but they must also have 400 hours of direct clinical practice with clients under the direction of licensed and nationally certified supervisors. SLPs are eligible to apply for a limited license while they complete their 36-week Clinical Fellowship year. Upon completion of the Clinical Fellowship hours, the student can apply for an SLP license.||For Section 86, MCA 37-15-301(3), ASHA recommends amending the strike out in order to maintain the limited license. This license is found in a majority of SLP licensure requirements nationwide and provides additional training needed to ensure the citizens of Montana are served by well qualified practitioners. ||For Section 87. Section 37-15-303, MCA Qualifications for licensure - speech-language pathologists - audiologists - assistants, (2) (a), the Department should be aware that ASHA's Scope of Practice for Audiology Assistants does not include an academic supervised clinical practicum for audiology assistants; however, the reference to (1)(a) does. ASHA recommends removing this specific requirement for audiology assistants only.||In the same section, (3), ASHA is concerned that the proposed language that allows for the delegation of tasks to unlicensed individuals by audiologists, SLPs, and assistants puts the public at risk of harm since there is no definition of what these tasks may entail. ASHA recommends one of two options.|1. deleting this section in its entirety, or |2. inserting the term ""unskilled therapy"" before tasks and providing a specific definition of nonskilled that does not conflict with tasks that remain solely within the scope of practice for each of the four individual professions. ||Either one of these proposed changes will ensure that protections offered to consumer and professionals under the Montana assistant bill (HB 210, 2021) stand.

||Thank you for your consideration of ASHA's comments and recommended amendments to the proposed Title 37 Reform regulations. If you or your staff have any questions, please contact Eileen Crowe, ASHA's director, state association relations, at [ecrowe@asha.org](mailto:ecrowe@asha.org).||Sincerely,|||Judy Rich, EdD, CCC-SLP, BCS-CL|2022 ASHA President|| American Speech-Language-Hearing Association. (2022). Montana [Quick Facts]. |<https://www.asha.org/siteassets/uploadedfiles/advocacy/state-fliers/montana-state-flyer.pdf>. | American Speech-Language-Hearing Association. (2022). Scope of practice for audiology assistants [Scope of Practice]. <https://www.asha.org/policy/scope-of-practice-for-audiology-assistants/#Minimum>.| Montana House Bill 210. (2021). Retrieved from <https://leg.mt.gov/bills/2021/sesslaws/ch0078.pdf>. ||

Please provide your first and last name Eileen Crowe

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Unique ID: 1052233204  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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CLS Board to Program, Entire Document||While I applaud some practical sense finally be applied to the Montana State licensure for CLS (Med Techs), the proposal in its entirety falls short of a practical and needed resolution, dissolution of State licensure. ||Unfortunately, I missed the last comment period when this licensure was under review but was able to read the supporting arguments for and against. I've also discussed this matter at length with CLIA auditors and other lab accrediting authorities such as CAP. State licensure is supported by emotional pleas and misguided notions of increasing personal financial reimbursement. ||Labs are without a doubt one of the most documented and regulated professions in healthcare. Lab records are required by Federal laws and overseen by existing Federal regulations (CLIA). So the challenge is a simple one, if State Licensure truly equals increased quality of a lab, then the data should be there to prove it. We have neighboring states of WA, ID, and WY all operating under no state licensure. Proponents that insist I should continue to finance their delusions of ""increased quality"" should bare the burden to prove that claim. Show me labs in these states have more corrected reports, more proficiency test failures, more CLIA violations. The data is out there, and it's public records. ||So, don't reduce the MT state licensure for CLS, eliminate it. ||Lastly, I would like to share one comment I had read from the past arguing for state licensure. I can't recall the exact verbiage, but the claim was made ""You need a license to give a haircut, shouldn't you need a license to perform lab tests?"". Well, I've had plenty of bad hair cuts. ||

**Please provide your first and last name** Reid Watkins

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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Current licensed professional in MT

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I noticed that in the surveys listed, there was no data from Emergency Care Providers (EMS). Was a survey conducted of this stakeholder group? No reference is made to the ECP-specific section of Health and Human Services, Emergency Medical Services, and Trauma Systems. This is the only staff familiar with the specialty of ECPs and EMS systems. In many other states, we conduct business with it is standard practice that the EMSTS Section / Office manages both licensure, investigation, and standards for the EMS profession. Please share why EMSTS is not included in the draft language. ||37-1-401 - Would you please define what a "Program" is in this context? How is it staffed, where does the funding come from, and what are the requirements of the people involved in administering the program? Can you please provide examples of other states using licensure programs? What are the perspectives of the state on the benefits of programs vs. boards?||2-15-1734 - What is the definition of "with emergency medical experience"? This is ambiguous language. If the intent of the new BOME is to provide an Emergency Medical Physician perspective, a board-certified emergency physician is the accepted standard.||50-60-203 - (1) Why is this entitled "Medical Assistance Program", is the state proposing the ECPs are designated as "medical assistants", is this referring to the medical assistance program for clinicians in need of rehabilitation? Who specifically will be responsible for this at DLI? Will this role be a dedicated FTE, and how will it be funded? What are the expertise requirements of this role? ||50-60-203 - (2) - There are three established, recognized, and standard scopes of practices for ECPs. Montana has struggled over the last two decades with multiple state-defined levels of licensure. This has caused significant confusion, sub-standard educational practices, unnecessary red tape for recruitment of new ECP providers, and harm to patients. It is ill-advised that DLI permits this loophole to continue. Additional scopes of practice "levels of providers" should be aligned with national EMS standards. This is the practice of nearly all other medical sub-specialties such as family practice nurse practitioners, pharmacists, physicians, etc... By leaving this undefined, we will continue to have a fractured EMS system where an EMT in Petroleum County is drastically different from an EMT Garfield county. The transition several years ago from the EMT I-85 scope of practice to the AEMT resulted in many MT ECP providers gaining significant scope of practice expansion with little to no education or clinical support. This is another example of the issues created when the state determines best practices for clinicians rather than following known best practices and standards. This also has a workforce impact, limiting ECPs in Montana from practicing in the State and in support of national disasters. ||50-6-201 - (4) EMS is a medical sub-specialty. Licensure of the profession requires a basic working knowledge of the profession and can likely be accomplished by training of existing DLI staff. However, the clinical practice of EMS providers, Paramedics, in particular, requires substantial education, experience, clinical knowledge, and training. The modern scope of practice of paramedicine needs subject matter experts to maintain and review best practices consistently. I am concerned that the current path proposed is the equivalent of suggesting that undefined persons would regulate nursing

licensure and scope of practice. ||50-6-202 - (2) Please elaborate on the intent of "including but not limited to" what other licensure type of EMS providers does the state intend to add? This is a non-standard language as there are only three recognized scopes of practice for EMS (ECP) providers. This language creates a variety of professional standard issues and has historically created significant confusion for ECPs in Montana.50-60-203 - Who specifically will be responsible for this at DLI? Will this role be a dedicated FTE, and how will it be funded? What are the expertise requirements of this role?||37-3-102 - (A) and (C) appear to contradict. If ECPs are not to be board governed by BOME, how can BOME then "Advise and Assist" county attorneys regarding ECPs licensed by the board? ||37-25-208 - (2) If ECPs are not board-governed, how will DLI determine "gross incompetence"? What measurement or professional standard will be used, and what will the qualifications of the person(s) making such a determination for ECPs be?||

Please provide your first and last name Benjamin King

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Unique ID: 1052233206  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

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Version 3 - Medical Examiners Board Changes||The ability to go specific change by change is quite difficult in this format. I complement the administration for there hard work on the red tape initiative and look forward to positive change moving forward. ||In this instance I urge the leadership to refrain from these extensive changes to the MT BOME. The role of the MT BOME is extremely important in our state and the planned amendments only lead to increased red tape and further bureaucracy. The autonomy and ability to work with independence for the good of patients and physicians is vital to the availability of high quality healthcare in Montana. I ask that the DLI and administration work hand in hand with the stakeholders including the BOME and MMA to create and design working language and policies that will enable the BOME to continue their mission of providing excellent oversight of Montana medicine.||Thank you for your time!

**Please provide your first and last name** Denny Orme

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IP Address:  
Unique ID: 1052233207  
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**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current Montana Professional Licensing Board Member

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While I realize this is just a memo to the Lt. Governor from the DLI none of the wording regarding the repeals of all the statutes regarding process servers and levying officers is removed. It is the SAME memo as the memo delicensing process servers, with an added line in red print stating process servers will not be delicensed, however, it doesn't correct anything else regarding the amendments and repeals. Considering how many times the 2nd draft regarding process servers has been removed then added back to the site it is surprising this has not been corrected at some point, just to be clear to everyone that the repeals proposed in the first draft are no longer being repealed. |TO: Lt. Governor Kristen Juras FROM: Department of Labor and Industry|DATE: December 6, 2022 SUBJECT: Boards to Programs.|Keeps Process Servers licensed (No Delicensing).|o Extends the cultivation of subject matter expertise for|policymaking from 3 board members in the profession to|the entire licensee pool of 2092 active licensees.|o Maintains full (same) disciplinary process to provide|protection for the public.|o Repeals - 2-15-1781, 25-1-1101, 25-1-1102, 25-1- 1104, 25-1-1107, 25-1-1111, 25-1-1112, 37-60-201, 37-60-211, 37-60-302 and 37-60-309|

**Please provide your first and last name** Roxene Cook

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233208  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I just need clarification on the displaying of licenses. I am the supervisor of the boiler plant on Fort Harrison which is a federal installation in Montana. There seems to be some confusion pertaining to licensing. Are we required to be licensed by the State of Montana working on a federal installation? And/or do we have to have our boiler licenses on display?

**Please provide your first and last name**

Clara Santopietro

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233209  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?**

Current licensed professional in MT

**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

I have been with this ambulance service since 1982, and have see a lot of changes for EMS in the past several years. i support the move of licensing from the BOME to the DLI. i do not support the move to this new health board. in 1982 we ran out of Community Medical Center with an RN to provide Advance Life Support to our community and surrounding area. in the very early 1990's Montana approved the practice of Paramedics for advanced life support, we transitioned out of CMC to fulltime paramedic service. The BOME took us from DPHHS to the BOME. It took a while but the BOME formed a medical director sub-committee which i believe was governor appointed, and Emergency Physician across the state of Montana. They gave us evidence based protocols that kept up with science. This committee was valuable to make sure protocols were evidence based and we remained in our scope of practice. we are providing some physician level skills in the prehospital environment that the make up of the new alternative health board is not a good fit. i would like to see the Medical Director subcommittee over see our EMS practice and protocols. since the staff and state medical director offices have been removed, there have been no protocol updates our anyone to talk to and get answers vital to EMS direction. i have seen many rouge EMS services in my career, i am afraid that is what we are going back to when removed from emergency room physician oversight at the BOME level.

**Please provide your first and last name** Don Whalen

Form Name: Comment Submissions - COPY  
Submission Time: December 30, 2022 5:02 pm  
Browser: Unknown  
IP Address:  
Unique ID: 1052233210  
Location:

**What role would best describe your connection with professional licensing in Montana (choose one that best describes your role)?** Director or member of an association connected with a licensed profession

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**Please provide comments on the released drafts. In your comments include the draft name, the page or section you are referring to, and provide specific details why you are in favor or opposition to the text. The drafts are in the section of this website called "Drafts" (below).**

Comments from Montana Dental Association (MDA) on|PROFESSIONAL & OCCUPATIONAL LICENSING LEGISLATIVE PROPOSALS|MDA is pleased to participate in Red Tape Reform effort directed by the Department of Labor and Industry, as follows:|BILL # 1 - BOARD CONSISTENCY REFORM (VER. 2 - 10/3/22)|Standardize Board Appointment & Membership, Officers, and Meetings - Title 2, chapter 15|Page 6, New Section 3, (2) ""The governor shall have the authority to remove members of the board with or without cause.""|We're concerned about the ability of a future governor to completely dismiss an entire board on inauguration. That would also be a disservice to the public. We believe current authority to remove with cause is sufficient.|Page 7, still New Section 3, (4) ""... A public member shall not be, nor shall ever have been, a licensee of the board on which the public member is appointed to serve, the spouse, parent, or child of a current or former licensee of the board...""|We believe this is extremely limiting for the pool of applicants and unnecessary, knowing that family members can certainly have differing philosophies. Disclosure of any familial relationship should be sufficient.|Pages 7-8, still New Section 3, (5) ""... No member of the board may serve as an officer or hold any leadership position in a state or national professional association representing the industry related to the profession regulated by the board for the term of the board member's appointment. A leadership position includes but is not limited to a voting member of an executive board, or service on an ethics committee, membership committee, examination committee, or other similar positions of the association or other similar organization.""|With all due respect, we believe in the integrity of our members and others to serve in a role of public service. While we believe our members already strongly support public health and safety, we believe they further understand and agree to that singular role for which they are appointed to a board. We also believe prohibiting the knowledge and connections that association members have through association is a disservice to the public. Technically, every single member of the MDA is in a ""leadership position"" due to their eligibility to vote at the General Assembly and elect officers. Could this provision be construed to only allow non-member dentists to serve on the Board of Dentistry? And if this concern is driven by immunity (market exclusion) concerns, what difference would it make whether a dentist is a member or not a member of MDA? Our members take an ethics pledge to join our organization; they will adhere to that. Nonmembers do not. <https://www.ada.org/about/principles/code-of-ethics>. Besides the chilling message this sends, it is also extremely limiting for the pool of applicants. I'm not aware of a dentist being appointed who is in one of those positions who has not resigned that position. Again, disclosure of relationship should also be sufficient.||Page 13, Section 7, revising MCA 2-15-1732 (1) ""There In accordance with [Section 1], there is a board of dentistry. (2) The board consists of ten eight members: (a) five four dentists,; (b) one denturist,; (c) two dental hygienists,; and (d) two one public members...""|This makes little sense. How is the current Board composition ""excessive, outdated, and unnecessary regulation"" as stated in the purpose of these changes? And what sense does it make for a Board looking out for public health and

safety to drop one of its public members? If there is a legitimate reason for this proposal, we're not aware of it. If it is to save money with fewer Board members, that paltry cost is supported by the licensees who pay for it. If it is to attempt consistency with other boards, it does not. ||BILL #2 - MODERNIZE & STANDARDIZE TITLE 37 UNIFORM PROFESSIONAL AND OCCUPATIONAL LICENSING ACT|...|Page 8, Section 6 - New Section. Military Spouse Temporary License|We support.|...|Page 10, Section 10 - New Section. Activated military personnel exemptions.| We support, as we also waive membership dues for those who serve.|...|Page 48, 37-1-121. Duties of Commissioner...|(1)(b) ...The department shall consult with the boards regarding recommendations for qualifications for executive or executive director positions.|Is it really that onerous to consult with a board?|...|Page 54, 37-1-145. Military training or experience to satisfy licensing or certification requirements|...|We support the amendments.|Pages 55-56, 37-1-304. Licensure of out-of-state applicants by endorsement - reciprocity.|...|We support the amendments. ||While these are the initial comments of the Montana Dental Association, we reserve the right to revise our position based on final bill language.|Thank you!|

Please provide your first and last name WEBB BROWN

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## October 17, 2022 DLI Red Tape Relief Initiative In-Person Public Comments

30:18 *Mac Minard: Director of Montana Outfitter and Guide Association*

- Senate Bill 275 passed by bipartisan majority- precipitated 14 different rule changes
- Board consistency reform draft comments: concern over board qualifications
- Draft will effect definition of a public member, meaning no direct link to the industry
- Difficult to find people who are interested without having a direct relationship to the industry
- How many degrees of separation -request for clarification
- Difficulty in getting qualified people if board members cannot have a link to an association
- Board of outfitters went from 7 people to 5 people, looked at specific disciplines for license type and endorsement type

36:04 *Scott Vollmer: Director at Large Montana Outfitter and Guide Association*

- Highlighted industry consensus in the process of Senate Bill 275- this determined qualifications for a public member and ensured they had subject matter expertise
- Wants the most qualified people in the industry on the board
- Concern over thinning of candidates and upholding level of expertise in the industry

39:37 *Alicia Beagles: Registered Nurse, Manager at Benefis Health System*

- Growing problem in the State of Montana and nationally of nursing shortage
- Propose change of Title 37 section 65 regarding medication aides: language change to remove long term care facility and insert facility licensed to provide nursing care instead
- CFR Federal law Title 42 chapter 4 subchapter G part 482.23 states that all drugs and biologicals, must be administered by or under supervision of nursing or other personnel in accordance of federal and state laws
  - Further interpretation of standard of practice
- Grey area for practice within the federal law- encourage state to verbalize in a licensing facility medication aides can exist
- Challenge the current standard of practice
- In order to provide better care there needs to be delegation of nursing tasks and medication
- This can help in change with CMS

46:05 *Patricia Steinmuller, Registered Dietician-Nutritionist, Member of the Montana Academy of Nutrition and Dietetics*

- Submitting comment today and in writing to revise Title 37
- p. 204 Section 111. Section 37-25-102

Add Medical nutrition therapy as #6 definition: “Medical nutrition therapy” means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions

- p. 204 Section 111. Section 37-25-102  
Revise the definition of nutritionist: “Nutritionist” means an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy
- p. 205. Section 112. Section 37-25-302  
Revise the requirement for nutritionist license. 37-25-302. Nutritionist license required.  
An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37, chapter 1.
- p. 206 Section 113. Section 37-25-303, MCA is amended to read:  
Revise the requirement for nutritionist license. 37-25-303. Qualifications for nutritionist license. An applicant for licensure as a nutritionist shall have current, valid registration from the commission on dietetic registration, or its successor organization, subject to the commission’s accreditation by the national commission for certifying agencies.
- Recommendation to replace outdated language with modern, standardized terminology; state clear qualifications for nutritionist licensure; create enhanced portability from state to state
- MSU Bozeman offers full continuum nutrition education program
- Advocates for the incorporation of these comments into the next Title 37 revision

51:54 *Terri James, Montana Funeral Directors Association, Assistant Executive Director*

- FDA opposes 2 provisions in the draft
- The first is that the proposal will prohibit a board member from also serving on the MT funeral directors association
- Believes that the provision likely violates the first amendment: the state has no basis to prohibit persons from associating with trade associations as well as serving on a regulatory board
- In addition FDA opposes draft legislation that takes the power away from board members and gives it to the Department; change in current practice; FDA seeks further explanation of why it is being imposed
- Boards are and should be independent decision makers and given a proper role in Department; would like that section removed
- FDA is willing to work with department on revising the draft

53:49 *Katie Patch, Montana Athletic Trainers Association*

- Version 2 section 33 of board consistency draft 2-15-1771: request to add must have current license to be on the board
- Background in sports medicine: preference to removes preferably to ensure that they do have that background

- Title 37 version 3 section 138 37-36-201 talking about degree from athletic degree from post-secondary education: MTATA would like it to say from CAATE which is the accrediting body, and would like language to say has passed the board of certification as well
- Question about when the bill will be introduced and who will be sponsoring the bill

56:47 *Jeff Havens, Registered Sanitarian*

- New power being proposed for the governor: ability to remove board members with or without case in paragraph 2 of section 3
- Believes it sets a system that could be corrupted
- Request to remove that particular sentence to be removed from bill

58:40 *Deborah Kimmet, Licensed Massage Therapist*

- Wanted to hear from other boards because each board is different
- Noticed in the past that one association dominated everything and raised the profile of the profession rather than focusing on public safety, as part of recent efforts they wanted to make sure that no one association dominated membership
- Made a statue for continuing education to address that
- 3 years of experience in field before they can sit on the board raises concern for experience needed to sit on a board
- Second concern is unlicensed practice provisions
- Unlicensed practice in massage therapy can be misused for human trafficking and sexual misbehavior
- Missouri uses the HOPE initiative
- How are things going to look on back end with compliance
- Complaint based system allows criminals to do what they're going to do instead of it being proactive
- LMT has had 29 unlicensed practices cases over the past 6 years
- Wants to allow law enforcement to take over not just department taking action
- If its happening by cartel it becomes dangerous to report
- Sent letter from organization addressing title protection and other issues

1:06:06 *Jim McLean, Montana Physical Therapy Association*

- Appreciates the opportunity to comment on bill drafts
- Concern about rulemaking authority: specifically in physical therapy statute which says board has the power to make rules, the new approach seems to be much narrower and it may be interpreted as restricting the board's authority
- Request to take a look at rulemaking authority



## QUESTIONS RECEIVED

Throughout this Red Tape Relief Initiative process, we have tracked questions submitted from interested parties to the Department. There is a dedicated [dlibsdcomms@mt.gov](mailto:dlibsdcomms@mt.gov) inbox that many people have sent questions to as well as the question-and-answer portion of our educational webinars.

**DLI Red Tape Relief Initiative Q&A Master List**

Date	Question	Answer
DLI Red Tape Relief Educational Webinar I 8-31-22	Landscape Architecture needs to stay as a professional board with Landscape Architects part of the board, and is in line with Council of Landscape Architectural Board for all licensing.	Answered at presentation
	Please describe the difference between program and licensing board.	Answered at presentations
	This has been very insightful. Why did these types of webinars not start before surveys were sent to licensees?	Received Comment
	I thought the initial survey that was sent to Registered Dietitians/Licensed Nutritionists was very confusing. It was sent with no background information related to the revisions. The survey seemed to try to collect "leading" responses which would benefit the state; not necessarily benefit the professionals who hold professional licenses.	
	I have tried 3 times to email questions and have had no response. I would've appreciated having the information to review prior to receiving the survey.	Met with this stakeholder multiple times
	Will you please post a link to the website in the comments so we can copy and past it?	Answered at presentation
	I did send these comments in via the comment box with in the last few days. Thank you	Received Comment
	Thank you for this session it is much appreciated	Received Comment
	Please define how the input and feedback is reviewed and facilitated? I heard a lot of comments requesting input and feedback but no discription of this is handled within the department.	Answered at presentation
	Thank you for your time today. Looking forward to adding comments and working alongside you all.	Received Comment

DLI Red Tape Relief Educational Webinar II 9-29-22		Thank you for your question Deborah. If you download and save the document it should allow you to manipulate it and make changes to your saved file. Please send comments under "comment submissions" on the DLI Educational Sessions Webpage and any questions to <a href="mailto:dlibsdcomms@mt.gov">dlibsdcomms@mt.gov</a>
	Does the system allow formatting; strike-throughs, underlining, and italics? If not, is there an email to send changes/comments to?	
	Right, I've already downloaded and saved the docs. BUT I want to send You changes with strike throughs, etc. How do I do that?	Ok, I see. Are you able to send as a pdf and send to the <a href="mailto:dlibsdcomms@mt.gov">dlibsdcomms@mt.gov</a> ? Adobe has a mark up function that we should be able to view and see your changes. We are also accepting written comment submissions so if you'd like to submit a printed copy we'd be happy to look at that as well. I hope this helps, let me know if I can clarify further.
	That's perfect. I just needed to know that the email with an attached pdf or just a formatted email would be acceptable to send our changes to. Thank you.	Absolutely! We'll be on the lookout for your submission. Thank you!
	how does the complaint process in a program utilize subject matter experts compared to a board?	live answered
	does program administration end at title protection? How would this affect practice exclusivity and other issues affecting public safety?	
	How does DLI plan to engage professional organizations? Will there be opportunities for meetings and engagement outside this larger comment and listening process?	live answered
	Will you be explaining how Program Administration functions?	live answered
	How often does the department suggest boards meet to be able to make faster decisions?	live answered
	Are you able to more thoroughly explain how "scope of practice" considerations will be handled or changed under this initiative?	live answered
	What boards are you considering as programs?	
	Explain how scope of practice is affected since our license scope of practice section is not identified in the title 37 reform draft.	
	How do you determine which comments involving the draft legislation gets added to the draft or modified accordingly?	live answered
		Thanks for this question! We have posted the drafts for everyone in the public and would love input from all stakeholders including boards! The drafts and updated versions are posted on the DLI Educational Sessions Website. We have heard from lots of board members already and hope that continues as we get further in the draft process.
	How is the state agency engaging the individual boards in these discussions? Have they been presented with the draft to gain their expertise, direct input?	
	I understand my license, or even a temporary one has been held from me, even though I am certified, have my hours but lack the affidavit that express the hours to qualify for licenses.	
	Question is...if we , electricians Nationwide go thru the same CODE NEC, why am i being shuned?	
	MEaning, I am licensed just, missing affidavit	
	Why are people without a PE allowed to describe themselves as an engineer	
	If we have comments about multiple sections is it best to submit as individual comments or lumped together?	Hi Allen. Great question! It is your preference but there is no character limit so if you'd like to combine them in one we will be able to see all of those comments.
	Title 37 Section 2 Timeline	live answered
	We have comments to submit on multiple sections of Title 37 reform in relation to our license. Should we make one submission to cover all comments or should each specific comment regarding a section be submitted separately?	Thanks for this question Pattii! If you identify which section you're commenting on that will help us organize the submission but we are happy to accept them in whichever format is easiest for you.
	My apologies, Title 37, Section 2 Timeline. The purpose of the program initiative is to speed up licensening, but in the document it states that the State has 45 days to issue a license. I am curious on how that is quicker or more efficient?	live answered
	The red tape relief is a review of overall licensing and standardization of policies and procedures.	
	We work like to work directly with DLI regarding Title 37 reform amendments that affect our license. This would be most efficient. How can working directly with DLI be accomplished?	live answered
	18 states have enacted legislation that allows boards and agencies in those states to recognize licenses from other states.	
	Is the DLI interested in comments about what legislatures in other states have enacted (a) to reduce red tape and (b) increase mobility?	live answered
	The Code explicitly states Who is a "Competent" for these licenses, and I have been approved from boards with same requirements... Just need this understood from someone that understand this and that in not asking in no way that this Board, or Program overrule in a unlawful way.	
	How will issues that are dealt with in two separate bills be handled if one bill passes and the other doesn't? Example: Quorum is eliminated in Title-37-Reform Section 4 and then re-defined in Board-Consistency Section 4.	
	If the first bill passes, but the 2nd one doesn't, you no longer have a quorum requirement. I noticed that this type of thing occurs elsewhere.	live answered
	Can you please identify which section in the draft and the specific proposed language that uniformly addresses "Title" protection?	
	*Title 37 Section 16.	
	The state agency shut out licensees from participating in the screening panel process without public notice; licensees had no vehicle to protest the change and loss of participatory role; while rolled back thanks to private sector protests, won't we be at risk of the state agency taking away rights through program administration?	
	I'm sorry I have not read all of the changes yet. However, have you considered lengthening the the licensing years to decrease the annual red tape?	live answered
	In connection with Title 37, section 2, Timeline. If the State has 45 days to issue a license, is it the intent of Title 37 to allow for a provisional license to practice a profession under section 24 while that Licensee waits for full licensure?	live answered
	I joined Late, in the red tape reduction process, is it being considered that if a Guide meets the requirements of the licensing process, eliminating the requirement to work under a outfitter, thus paying the outfitter a fee for the trips. we dont receive training or support commonly thus our on our own meeting the standards of behavior with clients and subject to the laws and common decency. it seem like a limiting the opportunity for others to get into this industry because you have to "pay to play"	
	I have another commitment and must leave during Q+A. Thank you for this session.	Thank you so much for attending!
	Will there be a "part 2" of this process that looks directly at each license type? To review and standardize policies and procedures specific to that particular industry. I.e. reviewing each license for its scope of practice	live answered
	What is the status of the Board of Medical Examiners? Will some professions be moved from Board to Program administration?	
Would it be possible to develop a table of contents or guide for the 379 page draft bill? Would be helpful to direct people to the specific page or pages that may affect their license or interest.	live answered	
Could you describe the difference between Board administration v. Program administration?	live answered	
Can you provide a link to the draft? I am not finding it on the state site.	<a href="https://boards.bsd.dli.mt.gov/educational-sessions">https://boards.bsd.dli.mt.gov/educational-sessions</a> There is a "drafts" tab at the bottom of that page	
In reading through the different board types they each have different numbers of members and different requirements for members, some more strict than others. Some have public members and others do not. How do you determine if that composition should have changes?	live answered	
Thank you for your answer. I think my question was poorly worded. When I mentioned standardizing i meant the policies and procedures for licensing within a certain industry. I.e. in the funeral business there are several types of licenses such as an a mortician and an apprentice. There are processes that could be reviewed and standardized within that specific industry.	live answered	
How does this provide clarity to applicants? It appears it causes confusion as one process is trying to regulate many different professions that are not similar. How do these rules change stop a person calling themself an architect when they are not licensed as an architect? Who would fix that problem when it happens? Draftsmen call themselves architects or architectural draftmen and they are not Architects.		
Will the October 17 also be streamed?	The October meeting will not. We really want to see people face to face. We do have 2 other streamed webinars coming up (1 in November, and 1 in December) if you are unable to attend the October meeting	
Will the October 17 meeting also be available for virtual viewing?	We are not planning on it at this time, but our November and December webinars will be streamed. We really want to encourage everyone to come in person in October.	

Was hoping it would be a hybrid session for those that would have to travel long distances.

**DLI Red Tape  
Relief  
Educational  
Webinar IV  
11-17-22**

What happened to the proposals for Consistency and Enforcement? Are those bills not moving forward or were there not changes offered?	
Can you please turn on closed captions for deaf LMTs such as me?	The live transcript should be running now. Thank you!
Is there a way to track changes between drafts? It is challenging to see what has been changed in a 400pg document.	
I am a licensed Massage Therapist that works closely with our rural hospital to provide pain and injury management. Please strike 37-33-402 from section 216 in the title 37 reform bill. I oppose repealing 37-33-402 from the massage law because it is the only place in state law that acknowledges that massage therapy is healthcare. This designation as healthcare is vital to my business and allows medical providers to refer their patients to me and work together for pain and injury management. Are other healthcare professional licensing boards being switched to this new model or is Clinical Laboratory Science the only one? How do these changes affect licensured massage therapists in Montana? Are you still considering ALL licensed professions move to this model or just specific ones that have been selected and listed today?	
Mr. Cook, how does this protect the public from those practicing the profession but not licensed, e.g. "surfer Dave" who's practicing as an architect?	
Please strike 37-33-402 from section 216 in the Title 37 Reform bill.	
Why: Your explanation on eliminating purpose statements is clear, but there is a case specific issue here: It's the ONLY place in statute where massage therapy is designated a healthcare profession. Your generalized purpose statement does not address this issue for massage therapists. The implication is that removing the purpose directly harms massage therapists as it can impact our ability to work in medical settings and receiving insurance reimbursement. Further comments on the "why" are in comments submitted in the other interface.	
In Hearing Aid Dispensers Board to Program draft I see numerous definitions listed, but no definition defining what a licensed hearing aid dispenser is. Since Audiologists and their assistants, Speech Language Pathologists and their assistants are listed in 37-15-102 section 1, but licensed Hearing Aid Dispensers are not defined, does that end my license as a Hearing aid dispenser? Also at the same time would it require Audiologists etc. to obtain a Hearing Aid Dispenser license to practice fitting Hearing aids? Thank you for all the rest of the draft! I think Board to Program makes sense. David Main HAD 321	
I believe the BOME has an 'Employee Assistance Program' for healthcare professionals who develop issues with substance abuse. Will ECPs not be eligible for this program if EMS is moved to Admin (and to where some other structure / system will need to get developed for EMS)?	live answered
When/when will you post the comments from the public? Will they be considered during the legislative process? Why were the Medication aides part of the reduction act? Lori Henderson	live answered
How do programs create more efficiency when we are asking a large number of licensees to make decisions as opposed to having a small group (board) discuss and determine action that will be taken for issues that arise?	
Why do they want to change the massage therapist statute?	
It seems like a large aspect of this project is to make language and oversight similar amongst the licensed professions. Why weren't all healthcare professions moved from a board to a program, especially in the case of healthcare professions that have direct patient care responsibilities to maintain continuity?	live answered
Where did these two bill drafts go? Board Consistency Reform Licensing Enforcement Reform	live answered
As an LMT I have already made a comment on the changes to Massage Therapy, but something additional has occurred to me and I wonder whether it has occurred to the Department: If the healthcare professional designation is removed (the proposed removal of 37-33-402), many of us who get referrals from PTs or MDs and who get reimbursed through insurance will be threatened and probably become defunct. Has this been considered—or perhaps it was addressed somewhere I was unable to find?	
Was the Board of Nursing involved in the Medication Aide I & II revisions?	
Is there Title Protection for the massage therapists repeal of 37-33-402 and if so where do we find this?	
Which 3 licenses are discontinuing?	
Is massage continuing as a board or program?	
I missed the beginning of the lecture, will the full recording be available to review later? or emailed out?	Yes it will be on <a href="https://boards.bsd.dli.mt.gov/educational-sessions webpage in the next 72 hours">https://boards.bsd.dli.mt.gov/educational-sessions webpage in the next 72 hours</a>
I understand the need to remove unnecessary or duplicate licenses, however, how do we know this will not in the future seek to eliminate even more. Often it is said about the lab only 13 states require licensing, how will it not eliminate our license in the future?	
Will Massage Therapists still be considered Health Care Providers?	live answered
Thank you!	
Why is the position of sanitarian in training being eliminated from the statute? Most sanitarians start as a sanitarian in training—it is difficult to hire individuals that can meet all the requirements for sanitarians without training.	
What is the purpose of excluding Massage from the Healthcare profession? This creates a huge dilemma for LMT's who provide for those seeking additional care to their medical care. This can also place our profession under "Adult Entertainment." By removing us from the Healthcare profession, we are subject to watering down the care we provide as well as misplacement under other categories. We provide care for the physiological body and more.	
I'm concerned about the proposed changes to regard massage therapy as a less viable therapy. There are plenty of studies showing the benefits of massage therapy so I don't understand why at this stage it is being questioned when I have been reimbursed for legitimate therapeutic sessions for 35 plus years for therapy, in Ontario, BC and MT. We all have ongoing education and have invested much time energy and caring into our profession.	
I also missed the early part of meeting due to being in a treatment session but will follow up. Thank you.	
Q1: What can licensee's expect in terms of license fee reductions given the cost savings with program administration?	
Q2: If national credentialing options exist, how does the Dept consider utilizing those nationwide credentialing programs? (i.e. National Environmental Health Assoc performs registered sanitarian credentialing for various states)	
Regards to Sanitarian Board to Program Admin:	
Q3: Based on this presentation, it seems licensure for Sanitarians will remain "licensure". Yet, the SAN Board to Program bill states that "the Department shall issue a certificate of registration". Can you explain why this "certificate of registration" language is used and what it means in regard to licensure?	
LMT's are being moved out from under the health care umbrella. Massage is preventative health care. How do we as LMT's comment on this process and stay in the realm of health care?	
I am not clear as to who will continue creating and maintaining the Statewide EMS Protocols created and maintained by the BOME. As an Emergency Physician and Medical Director for two fire departments and an ambulance company, the availability of the protocols is essential to the safety and consistency of prehospital patient care in the State of Montana. If they are who will be doing this. Not all licensees are not SME. Age and experience in Medicine are invaluable.	
Why were the testing requirements and details of what the test consists of removed from the electrical board sections.	
Correction: Not all licensees are SME	
Were subject level experts consulted about changes to WHAT (vs HOW) items prior to drafts? If so, what was that process? There are some changes in the SLP/Aud licensing area that do not affect procedure but quality/level of education required that impact consumer safety.	
Currently, how is the money used from licensing fees? What happens to licensing fees when a board is moved to a program?	
Can you please speak to New Section 216 (standard) repealer. Specifically removing 37-33-402.	
37-33-402. <a href="https://leg.mt.gov/bills/mca/title_0370/chapter_0330/part_0040/section_0020/0370-0330-0040-0020.html">https://leg.mt.gov/bills/mca/title_0370/chapter_0330/part_0040/section_0020/0370-0330-0040-0020.html</a> 1/1	
MCA Contents / TITLE 37 / CHAPTER 33 / Part 4 / 37-33-402 Purpose Montana Code Annotated 2021 TITLE 37. PROFESSIONS AND OCCUPATIONS CHAPTER 33. MASSAGE THERAPY Part 4. General Provisions Purpose 37-33-402. Purpose. (1) The legislature finds that the practice of massage therapy affects the health, safety, and welfare of the people of this state and declares that the practice of massage therapy contributes to choice in health care. (2) It is the purpose of this chapter to regulate the massage therapy profession, to create a board of massage therapy that will issue massage therapy licenses in accordance with this chapter and the board's rules, and to define the terminology describing competencies of the massage therapy profession.	Comment Received
In the architects example- you noted that the guy who went surfing instead of getting his license could not say he provided "architectural design" or use various other terms beyond just "architect". Where is the list of those other terms and how do folks now what terms are they protected if they're not published in the statute under 37-15?	Answered at presentation
He answered the whole question—thanks!	Comment Received
Why is process serving and levying, not deemed important in the scope of public safety?	Comment Received
Thank you for clarity!	Comment Received
Can someone give me the reference where massage is designated as healthcare?	Answered at presentation
Thank you for all your work.	Comment Received

	Thank you Mr. Cook for your time today.	Comment Received
DLI Red Tape Relief Educational Webinar V 12-15-22	My concerns are places that used to explain what is on a licensed exam has all been changed to " Board Rule' where is the board rule that explains what the test consists of	Comment Received
	Do you know when these bills will be introduced in committee?	Answered at presentation
	who will be in charge of ems licensing?	Answered at presentation
	With the changes to the Medical board with Nutritionist, EMT, Paramedics moving to a program will that change the make-up of the board? I believe currently there are designated positions of those disciplines on the board.	Answered at presentation
	Hello from Whitefish MT. This is Kim, representing "Flathead Holistic Practitioners". Question: As healthcare professionals & specific to licensed massage therapists, what changes are proposed & will LMT retain ability to work with insurance claims ?  Lastly, please confirm the major changes/consolidation board to LMT in MT.	
	Thank you!	Answered at presentation
	How many comments were recieved on the ECP Board to Program?	Answered at presentation
	how many comments about the ECP changes?	Answered at presentation
	Why did the drafts for "Board to Program" remove "program" and replace it with "department" in place of "board."	Answered at presentation
	what is the process for creating and assigning members for "program administration" what are the rules for these administrative groups, how are people appointed?	Answered at presentation
	Professional Licensing Communications Inbox	Is there still time for a submission regarding the Governor's Red Tape Reduction Initiative?
Attachment from Professional Land Surveyor		Received Comment
As the chair of the Montana Society of Radiologic Technologists, I would really like to meet, talk through this process and be an advocate for changes. I am seeing reasons to discuss further program vs board. I really like some things I am hearing. Please feel free to reach out to me		Stakeholders were told at presentation to send email request
In regards to the modernization of boards and rules, would this include adopting OSHA's final rule regarding cranes and derricks?		Received Comment
Would it be possible to develop a table of contents or guide for the 379 page draft bill? Would be helpful to direct people to the specific page or pages that may affect their license or area of interest.		Spoke at Live Event to this commenter
Attachment of comment from BLMTB Board of Directors		Sent response on 12/13/2022
Before I took on this role, I was the Colonel of the Montana Highway Patrol. Over the years, I have shepherded several pieces of legislation through the legislature, although I have never been around a 379 page bill. Unfortunately, the bigger the bill, the easier it is to vote no from a legislative standpoint. We learned that having a "cliff note" version section by section analysis that referenced page numbers of the draft bill was a great reference. Legislators, concerned citizens, lobbyists, etc., could easily reference the section of proposed legislation that applied to them. It went a long ways toward clearing up any confusion and also made it harder for someone to start a lobbying campaign against the bill by spreading misinformation. Happy to talk or visit in person if you have any questions.		Spoke at Live Event to this commenter
Hello. I am following up on comments you have made at the DLI webinar today. Montana Academy of Nutrition and Dietetics (MTAND) requests opportunities to work collaboratively in direct communication with DLI regarding Title 37 reform amendments that affect the nutritionist license. Many MTAND members are licensed nutritionists. We have subject matter expertise and have been drafting modernization text for our nutritionist license, even before the red tape reduction initiative was introduced. We have developed suggestions for revision of various sections of the Title 37 Reform draft document that affect our licensure. Working directly with key MTAND members would be most efficient, effective, and timely to meet the goals of the initiative. Please respond with information on how can DLI can arrange meeting with MTAND to work collaboratively with DLI on Title 37 Reform amendments that affect nutritionist licensure.		Met with Stakeholders multiple times
Please put me on the interested party list for the Board of Public Accountants and DOL red tape initiative relating to the Board of Public Accountants?		Done
Hello my friends. I was looking through the drafts about license changes and could not find the word crane at all. I hope we are still planning to address the issues on not meeting OSHA standards for license renewal, specifically the retesting every 5 years and hopefully getting smother reciprocity with the national certifications. It may also be helpful to put in writing that a DOT physical for a CDL works for crane license physical, every time the state hires new staff the new people are confused on that one. When relicensing that physical should be provided in my opinion.		Received Comment
My comment is on the Title 37 Reform Draft. I am in opposition of the draft because it does not address the title inequity of LPAs compared to CPAs or the fact that LPAs were written out of statute by the Board of Accountancy back in 2015, which is clearly evidenced in Section 153 of the draft, particularly 37-50-101(8), which defines the practice of public accounting as one who is licensed as a certified public accountant and not a licensed public accountant. The draft also does not serve to merge the three remaining LPA licenses into the CPA license class in order to eliminate the confusion and ambiguity given the obscurity of the LPA title given that in Montana, an LPA has the exact same scope of practice privileges that a CPA does. It has been acknowledged by a former executive director of the Accountancy Board that an LPA is basically a CPA under an alternate title. My proposed solution is to amend Section 156 of the draft legislation with the following verbiage: Section 1. Section 37-50-318, MCA, is amended to read: "37-50-318. Transition of Existing licensed public accountants or certificate transition. (1) A person who holds a licensed public accountant license and permit to practice on July 1, 2015 [date of passage or predetermined subsequent date thereof], issued under the laws of this state may renew the person's existing license and is not required to obtain a certified public accountant license under this chapter. The person must otherwise be subject to all provisions of this chapter shall be issued licenses as certified public accountants and shall be titled as such accordingly. The rationale for this has been addressed extensively in previous comments and therefore is not necessary to belabor herein. Suffice it to say, it serve to help clean up the licensing law language by eliminating confusion and ambiguity due to the obscurity of a title that is functionally identical with CPA and therefore does not pose any health and safety issues.		Comment Received
Re: Title 37 Reform - Title Protection Question: I've reviewed all three draft documents and noticed that title protection had been removed. for instance in 37-17-301. Has that section been moved into another part of this draft or one of the other drafts?		Emailed response 10/3/2022 10:34AM
I registered for the DLI professional licensure meeting in Helena on Oct 17 but I need to attend via Zoom or some form of teleconference. How can I attend virtually?		Contacted
Hope all is well! Would you be able to add me on the list for any upcoming events, webinars, news, renewals etc		Done
Will you please provide the rationale behind the highlighted items. A. Standardize Board Appointment & Membership, Officers, and Meetings – Title 2, chapter 15 Repeat redundant provisions in practice acts (to be accomplished in Bill #2 below) and create consistent standards under two new uniformly applicable statutes that: 1. Set four (4) year terms, limited to two (2) consecutive terms with a four year-break before reappointment may occur. 2. Eliminate the number of years of residency to qualify for board membership and instead require current residency. 3. Eliminate the number of years of licensure or experience to qualify and instead require "active license in good standing" and "current practice" for professional board members. 4. Require public members to be independent from the profession of the board they are appointed to and licensed members to be independent from related professional associations. 5. Require boards to meet "at least annually" and strike specific meeting locations as antiquated given remote meeting participation. 6. Standardize language and eliminate redundant or contradictory language on the organization of boards, election of officers, compensation, and travel expense. 7. Provide for removal of a board member automatically for failure to attend meetings, e.g., three board meetings over a period of 12 months without good cause. 8. Allow Governor to remove board member with or without cause.		Answered at presentation
Attachments from Montana Academy of Nutrition and Dietetics	Met with this stakeholder several times	
Revised Attachments from Montana Academy of Nutrition and Dietetics	Met with this stakeholder several times	
When will an agenda be posted for the Oct 17 in-person session? Have you read the revisions to the Title 37 Bill Ver 3 recommended by the Montana Academy of Nutrition and Dietetics? Please view them below. Do you have questions about those recommended revisions? Would the recommendation revisions by the Montana Academy of Nutrition and Dietetics be included in next version of the Title 37 bill? What is the DLI process that the DLI anticipates to occur before the election?	Met with this stakeholder several times	
Attachment from Benefits Manager of Patient Flow and Medical	EO Met with Stakeholder	
I am not able to attend tomorrow's meeting. I will read over the draft bill and comment. Subject: Key revisions by the Montana Academy of Nutrition and Dietetics to nutritionist sections of DLI Title 37 ver 3. This comment is a follow-up to information presented at the DLI meeting in Helena on October 17, 2022, regarding revisions to 37-25 sections of Title 37 Bill Ver 3, pp. 202-209 recommended by the Montana Academy of Nutrition and Dietetics, an affiliate of the national Academy of Nutrition and Dietetics. Members include registered dietitian nutritionists, other food and nutrition professionals, and students in the dietetics-nutrition fields of study. Many registered dietitian nutrition members are licensed nutritionists. The Montana Academy of Nutrition and Dietetics has recognized the need to modernize Montana's nutritionist licensure and has been exploring ways to reach that goal to protect public health and safety more effectively. However, the Governor's Title 37 reform bill now provides a more efficient process than has previously been available. Although comments submitted to DLI by the Montana Academy of Nutrition and Dietetics on October 7, 2022, provide greater detail, the four recommended revisions listed below summarize the key elements in achieving efficient and effective modernization of nutritionist licensure revisions in the Title 37 bill: 1) p. 204 Section 111. Section 37-25-102 MCA is amended to read: Add Medical nutrition therapy as #6 definition: "Medical nutrition therapy" means dietetics-nutrition practice intended for the treatment or management of diseases or medical conditions 2) p. 204 Section 111. Section 37-25-102 MCA is amended to read: Revise the define of nutritionist: "Nutritionist" means an individual who engages in the practice of dietetics-nutrition, including the provision of medical nutrition therapy 3) p. 205. Section 112. Section 37-25-302, MCA is amended to read: Revise the requirement for nutritionist license: 37-25-302. Nutritionist license required. An individual may not provide medical nutrition therapy unless actively licensed under this chapter and title 37, chapter 1. 4) p. 205 Section 113. Section 37-25-303, MCA is amended to read: Revise the requirement for nutritionist license: "37-25-303. Qualifications for nutritionist license. An applicant for licensure as a nutritionist shall have current, valid registration from the commission on dietetic registration, or its successor organization, subject to the commission's accreditation by the national commission for certifying agencies. Rationale: Medical nutrition therapy is the area of nutrition care services where risk of harm to the public is greatest when performed by unlicensed individuals. Thus, medical nutrition therapy represents the scope of practice for registered dietitian nutritionists. Medical nutrition therapy is nationally recognized and the essential element in modernized nutritionist licensure statutes in at least six states, including North Dakota in 2021, and underway in at least 20 other states. Additionally, the Medical Nutrition Therapy Act (2021-2022), is a bipartisan bill introduced in Congress. In total, the revisions recommended by the Montana Academy of Nutrition and Dietetics replace outdated language with modern, standardized terminology, ensure sound licensing practices, state clear qualifications for nutritionist licensure, promote efficiency and clarity, enhance portability of licenses, and greatly expand nutrition services of unlicensed individuals. Regarding the Governor's interest in workforce development, Montana State University-Bozeman offers the full continuum of undergraduate and graduate degree and dietetic internship required for successful individuals to take the national credentialing exam to become registered dietitian nutritionists, and then apply to the Montana DLI for nutritionist licensure. To date, greater than 50% of internship graduates have secured employment in	Met with Stakeholders multiple times	



<p>As a process server and levying officer, we have very sensitive information that we work with. Delicensing, not having background checks required, and all you are proposing is a risk to the public. Not having a license to be able to levy bank accounts, State Dept. of Revenue, and wage garnishments is a huge risk, and our government not wanting to govern this is a huge step back in our profession. I know our business is upstanding law-abiding process servers and levying officers, but not everyone is. So, making it easier for a non-upstanding person to do this kind of work is worrisome. Please reconsider the decision to de-license. Just because it may be easier for the department of labor, and possibly more cost effective as previously stated, does not mean this is the best for the residents of Montana, and the residents are whom truly matter. This could mean convicted felons, and the like could be hired to go to people's houses to serve documents and no one is the wiser. Situations as this and worse can very easily arise, being able to not have a license. It is quite clear the risks outweigh the good in the decision to de-license. Would it be possible that the county courts could require the license, background checks, and be appointed by court administrator? I know quite a few different states do this. Most states are starting to require registration and licenses to be a process server. Seems like Montana is taking a step back in the regulations, instead of moving forward like the rest of the states.</p>	<p>Answered 11/22/2024:17PM</p>
<p>I myself am a levying officer and process server. I mostly handle writs of execution and we employ quite a few people to do so. If there is no requirement for a license is there anywhere in the statutes that would protect our jobs that are at risk? In the statutes that guide us, it states levying officer or sheriff. Will this wordage be removed from statute and only the sheriff's office handle writs of execution? This is not only my job but the jobs of my coworkers and many others throughout the state. Was this intended to take away jobs of Montanans, and force this workload onto the short-staffed sheriff's offices around the state? This would not be ideal due diligence. How would this benefit the general public of Montana?</p>	<p>Answered 11/22/2022 4:22PM</p>
<p>After speaking with a number of process servers in the state, many are concerned that your draft will eliminate a process server's ability to levy or to serve more than ten documents per calendar year. This will cost a number of Montanans their jobs who are currently employed as process servers and levying officers, and I did not think that was the intent of the Red Tape Initiative. Please comment on what is left in the statutes that allow process servers to continue with their profession, including their ability to levy.</p>	<p>Answered in the email response sent 11/22/2022</p>
<p>Thanks for your answer and thoughts! Do you foresee, if the bill passes, some sort of formal process to work on the rules with representatives from various companies? Who would pick who sits at the table representing the industry? Just trying to get my head wrapped around how the process would work and look.</p>	<p>Spoke at Live Event to this commentor</p>
<p>I am worried about my business and 20 employees and their families. I have highlighted the statute below and wonder if there are any changes here? Also, my company wrote the current process server handbook, attached, is it obsolete now? Montana Code Annotated 2021. TITLE 25. CIVIL PROCEDURE. CHAPTER 1. GENERAL PROVISIONS. Part 11. Registration of Process Servers -- Levying Officers. Registered Process Server -- Levying Officer -- Use Of Title Reserved 25-1-1101. Registered process server -- levying officer -- use of title reserved. (1) Except as provided in subsection (2), a person who makes more than 10 services of process, as defined in 25-3-101, within this state during 1 calendar year must be registered under Title 37, chapter 60. A process server who holds a valid certificate of registration from a clerk of court in this state as of July 1, 2007, shall present the registration certificate to the board of private security, and the board shall exchange that registration certificate for a new certificate that expires on March 31, 2009. (2) This part does not apply to: (a) a sheriff, constable, coroner, eltor, or other government employee who is acting in the course of employment; or (b) a licensed attorney. (3) A registered process server may act as a levying officer under Title 25, chapter 13. (4) A registered process server may make service of process in any county in this state. (5) A person may not use the title of process server unless the person is registered as a process server under Title 37, chapter 60. History: En. Sec. 1, Ch. 548, L. 1987; amd. Sec. 2, Ch. 392, L. 2005; amd. Sec. 2, Ch. 405, L. 2007. I am looking for some insight and information as to what the plan is for process servers. That is the section of Private security- repealing sections 2-15-1781, 25-1-1101, 25-1-1102, 25-1-1104, 25-1-1107, 25-1-1111, 25-1-1112. When we are no longer licensed, who will oversee us? The role and scope of duties that process servers (we are also levy agents) includes- 1. Serving legal documents and providing affidavits to the court. Those services take place at peoples homes, work places or anywhere we can locate them to get them the documents. 2. Executing Writs of execution issued by the court. With the writ of execution we can seize bank accounts, property and garnish wages. Having the ability to do these things should require a license with background checks and require bonds. That is the current status of licensing. We have a HUGE impact on peoples lives and should have oversight and licensing. Just the company I work for serves several thousand documents a year and executes thousands of Writs of execution. We seize millions of dollars a year. I would like to know what the states plan is to replace/oversee that need and the plan to help keep the legal rights of the public from being violated.</p>	<p>Answered in the email response sent 11/22/2022</p>
<p>Attachment from Montana Optometric Association</p>	<p>Met with this stakeholder group</p>