OCCUPATIONAL LICENSING AND RECIPROCITY IN MISSOURI AND THE U.S.

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SUMMARY

- Occupational licensing requirements have risen from five percent of the workforce holding a license in the 1950s to about twenty-six percent of the workforce holding a license in 2016.¹
- Missouri is one of the least licensed states along with Kansas and Washington.² Missouri licensing fees and average education requirements are some of the lowest in the nation.³
- However, one-third of the lower-income professions Missouri licenses are not required in a majority of other states in the U.S.⁴
- In an IPP analysis of licensing in neighboring states, 139 professions were identified as licensed in at least one of the states. Approximately 27% of the examined professions were licensed by all six states and about 41% of the professions were licensed by only one state.
- Research indicates that additional training does not necessarily result in higher wages and lower requirements do not necessarily result in lower quality or outcomes.⁵
- Because occupational licensing regulations are enforced and controlled by each state throughout the nation, there are varying requirements and qualifications. This makes reciprocity, the policy and process of accepting an individual's license from another state, difficult due to significant disparities among state requirements.
- Disparities among states can create barriers for people working in licensed professions to reenter the same profession in another state.⁶
- Low income populations are more likely to be negatively impacted by licensing requirements and lack of reciprocity than other populations because of the additional resources required for relicensing.⁷
- Workers who hold a license are less likely to move across state lines than those who do not.
- Some states and professions have attempted to make reciprocity easier by creating compacts or agreements with other states.

INTRODUCTION

This policy brief examines reciprocity within occupational licensing in Missouri and the United States. Reciprocity is the policy and process of accepting an individual's license from another state for practice in the new state. This policy brief is a supplement to the research report, *Occupational Licensing and Women Entrepreneurs in Missouri*, produced by the Institute of Public Policy in November 2016 for the Women's Foundation.





HISTORY AND CONTEXT

Occupational licensing (OL) is a mechanism used by states to ensure public health and safety and provide for the public's wellbeing by setting standards of education, experience and fees for licensure within a profession. Over the course of the last several decades the rate at which American's are licensed has risen from one in twenty to about one in four. The practice of licensing of certain occupations has roots in early American history; colonies licensed occupations like bakers, ferry workers, and innkeepers. In 1889, the Supreme Court established the states' rights to regulate occupational licensing in *Dent v. West Virginia*. For more information about Missouri licensing structure, see Appendix A.

For decades, occupations like nursing, dentistry, medicine, pharmacy, and pesticide handler have required licensure as a means of protecting the public. However, some non-traditionally licensed professions have come under state regulation. Interior design, a newly licensed occupation, requires either a four-year university degree in interior design from an accredited university and two years of experience; three years of interior design courses and two years of experience; or completion of a two-year program and four years' experience in the field. Interior design has higher qualifications than many occupational licenses in the state, including an Emergency Medical Technician. An EMT-Paramedic in Missouri needs to complete 144 hours of training and take two exams to be licensed.

The debate continues among politicians, licensed professionals, and economists regarding the intent, necessity, and economic impact of occupational licensing requirements. Research indicates that while licensed professionals may earn higher wages, the required training and fees can result in a barrier for lower-income individuals to enter the field. Meanwhile, some licensed professionals, such as cosmetologists, argue that such strict, high requirements for a license protect public health interests, as improper skin treatment or other mishandling of chemicals could be potentially fatal. ¹⁶

Calls for occupational licensing reform have seen bi-partisan support with practice and policy reforms and recommendations from both Democrats and Republicans.¹⁷

- In 2013, former Indiana Governor Mike Pence (R) supported fewer OL requirements and worked to alleviate barriers to entering the workforce. He moved to eliminate many licenses altogether, and vetoed bills that would impose more licensing requirements. He moved to eliminate many licenses altogether, and vetoed bills that would impose more licensing requirements.
- In 2016, former President Barack Obama (D) released federal recommendations for states to create less burdensome requirements to benefit workers attempting to enter the workforce.²⁰
- In 2016, Arizona Governor Doug Ducey (R) signed six bills in order to reduce occupational licensing requirements.²¹
- In 2016, Delaware Governor Jack Markell (D) instructed the Chair of the Joint Sunset Committee to conduct an analysis of existing requirements to build on recent reforms.²²
- In 2017, Nebraska Governor Pete Ricketts (R) proposed reforms to lower OL requirements for 20 professions to better match the requirements of other states.²³





VARIANCE IN OCCUPATIONAL LICENSING REQUIREMENTS

Pure reciprocity would allow an individual with a license from one state to be able to use that license in another state to practice his or her profession with few or no extra fees, education, or experience requirements. An example is the reciprocity which occurs with driver's licenses. When a driver licensed in another state moves to Missouri, the driver's license is valid and the driver can continue to legally operate the vehicle in the state. Once the driver establishes residency, usually within 30 days, he or she can become licensed in Missouri by surrendering the out-of-state license and paying the appropriate fee.²⁴

Unlike driver's licenses, state requirements for occupational licensing can be starkly different between states. For example, for a cosmetology license in Missouri, an individual needs 1,500 hours of education and training along with an examination,²⁵ while in New York, an individual only needs 1,000 hours of education and training along with an examination to be licensed.²⁶

If a licensed cosmetologist moved from New York to Missouri just after receiving his or her license, he or she would not qualify for a Missouri cosmetology license until the individual completed additional hours of training or apprenticeship.²⁷ Until those requirements had been fulfilled, the new resident would not be able to practice in the state of Missouri.

A 2012 study of lower-income professions and licensing found *one-third* of the lower-income professions Missouri licenses are not required in a majority of other states in the US.²⁸ These circumstances raise ongoing questions and concerns regarding the necessity and intent of occupational licensing requirements.

Research also indicates that additional training does not necessarily result in higher wages and lower requirements do not necessarily result in lower quality or outcomes.²⁹ One study found that, "cosmetologists seem to earn smaller wages in states with more stringent licensing policies overall."³⁰ Another study conducted by Kleiner and Kudrle on the outcomes of licensed dentists found that, "tougher licensing does not improve outcomes,"³¹ such as untreated dental health deterioration, complaints against dentists, or malpractice insurance premiums.³²

Appendix B provides two tables listing the requirements for Massage Therapists and Speech-Language Pathologists, and the variation between Missouri and its surrounding states. Additionally, reciprocity terms and wages are also listed for each state. This table illustrates the stark differences in requirements, for each state for the same license.

MULTI-STATE COMPARISON

The Institute conducted a multi-state analysis of occupational licensing in surrounding states for comparison purposes. The Institute began by collecting data on all of the professions which are licensed in each of the following states: Arkansas, Illinois, Iowa, Kansas, Nebraska, and Missouri. While the Missouri Division of Professional Registrations oversees 41 boards and numerous professions, some licenses are overseen by other state agencies. For example, in Missouri, EMTs are licensed by the Missouri Department of Health and Senior Services, teachers are licensed by the Missouri Department of Elementary and Secondary Education, and pesticide handlers are licensed by the Missouri Department of Agriculture, all of which are included in this analysis.





For this analysis, duplications and subcategories were collapsed into a list of approximately 139 occupations that are licensed in at least one of the six comparison states. Required certification, registration or permits were not included in this analysis, only licenses overseen by the state. In an analysis of just these occupations, Nebraska licensed the most with 97 professions, Kansas was the lowest with 48, while Missouri licenses 68 of these professions. All states licensed certain professions such as accountancy, dentists, doctors, nurses, commercial drivers, cosmetologists and barbers. About 27% of the examined professions were licensed by all six states and about 41% of the professions were licensed by only one state. Iowa and Nebraska had the most professions licensed in only one state. See Appendix C for the full summary table. The analysis illustrates the differences in licensing requirements even among neighboring states.

RECIPROCITY

There are two different types of reciprocity that are important to recognize. One is a state-to-state agreement, like the Nursing Licensure Compact (NLC) where multiple states agreed to accept nurses licensed in other states within the NLC without any additional requirements.³³ The other type of reciprocity is on an individual basis, each state sets their policy regarding what qualifications are taken into consideration. For example, in Missouri, one can receive reciprocity for a Speech Language Pathologist license if he or she received the license in a state with equivalent or higher standards.³⁴

INTERSTATE MOBILITY

Research on occupational licensing indicates that having a license and the inability to easily transfer it to another state limits mobility of the licensed workforce. While licensure requirements have steadily increased over the past several decades, interstate migration rates have fallen 50% in the last twenty years. In fact, people who have a license are less likely to move across state lines than those who do not have a license. For example, barbers and hairdressers are 27 percent less likely to relocate to a different state when compared to peers in other occupations. Many states are working to alleviate extra requirements to licensing in order to make reciprocity easier and increase mobility. By allowing licensed professionals to maximize their potential earnings these policies could have positive impacts on the states' and industries' economy.

Organizations are also creating compacts, like the Nursing Licensure Compact (NLC), which make reciprocity easier. Multistate compacts like the NLC could aid those who move frequently for their job or their partner's job. Research has shown that a family's migration habits are predicted by a male partner's educational attainment of a bachelor's degree and not a female partner, therefore families are more likely to relocate for a man's profession. As a result, research indicates that relocation for a man's career tends to improve his career development, but impair a woman's career development. Additionally, people are also more likely to move to a state where their occupation pays more.

Research has shown that a family's migration habits are usually predicted by a male partner's educational attainment.





The findings on compacts like the NLC and mobility are mixed. In one study of interstate mobility, nurses were the only licensed workers who had migration rates higher than their peers, by two percent. In a different research studying regarding the effects of compacts the data indicates little or no difference in employment and moving patterns. The study looked at the NLC and found that there is no significant impact on hours worked, employment levels, earnings, and migration. While there were no significant findings, there were limitations to studying migration patterns, as the rate of interstate migration is very small.

Another important aspect of reciprocity is how people who live close to state borders are affected. In 2014, Missouri and Kansas passed the State Authorization Reciprocity Agreement for Distance Education in higher education.⁴⁶ This compact focuses on the ability of postsecondary institutions to offer distance classes in other states without additional state authorization.⁴⁷ This compact could serve as a model for how reciprocity of occupational licenses could be handled among states. Another example is the Missouri-Kansas Reciprocal Agreement on Architecture, Dentistry and Optometry which allows students to attend out-of-state programs for reduced costs.⁴⁸ Having border state reciprocity deals could be an option to better fit the needs of cities that lie close to state borders, like St. Louis and Kansas City.

RECIPROCITY AND MILITARY SPOUSES

Specific reciprocity laws for spouses of military personnel have made it easier for those spouses to work after moving across state lines. A spouse of an active duty member can obtain a temporary license in the state of Missouri that allows the individual to practice his or her profession for 180 days. Licenses can be extended as long as they meet basic requirements; such as, an individual holds a current license, the individual is currently practicing, his or her license has not been suspended, all appropriate fees have been paid, and a criminal background check is completed.⁴⁹

RECIPROCITY COMPARISONS

Some states are known for having industry specific requirements far higher than other states. Teachers in Illinois are a good example. Illinois has a specific exam teachers must take to be licensed to teach in the state. Teachers are not allowed to even apply to a school in Illinois without proof that they are licensed. In Missouri, education licensure is overseen by the Missouri Department of Elementary and Secondary Education. Read more in the following case study:

Case Study: Moving to Illinois as a Licensed Teacher

Illinois has a multistep process for teacher licensure that does not align with most states, and Illinois does not currently offer a complete reciprocity program. In order to become a licensed teacher in the state of Illinois, one must complete a teacher preparation program at an Illinois approved institution. ⁵¹ Before being accepted into an accredited program, educators must take the Test of Academic Proficiency (TAP). According to the Illinois State Board of Education, there are 76 Illinois institutions that qualify as a state approved, accredited program, and they will accept a degree from an out-of-state school if it is accredited by a regional accreditation agency. ⁵² In addition, secondary education teachers must also have educational experience in a specific subject (i.e. English or Math). ⁵³

From here, educators then take the Illinois Licensure Testing System (ILTS) Test. This test is specific to Illinois, and all educators (early childhood education-12th grade including special education) are required





to take this exam, even if they have taken a different state specific test elsewhere or are licensed in another state.⁵⁴

In addition, secondary educators must take an exam in the field they are pursuing (i.e. English or Math). The Education Teacher Performance Assessment (edTPA) is another exam Illinois educators, as well as educators in 30 other states must take; states set their own standards for test scores.⁵⁵ Illinois sets its own standards for this exam, but will accept a score if passed based on another state's standards.⁵⁶

These standards for educators were put in place to better Illinois' education system; however these standards may create barriers to entering the market, and may contribute to job shortages. According to the Illinois Department of Employment Security (IDES), job openings in Illinois schools are predicted to increase to a combined 3,274 by 2024.⁵⁷

In most cases, Missouri teaching licenses are issued with no further requirements other than having a license from another state.⁵⁸ The strict regulations and lack of true reciprocity make it difficult to enter the profession and results in teacher shortages throughout the state.

IMPACT OF OCCUPATIONAL LICENSING AND RECIPROCITY

Women in Licensed Professions

The portion of the workforce made up by women in the United States has been growing for the past half century.⁵⁹ In the US, in 2015, employed women were more likely to hold a certification or license than employed men (28.1 percent and 23.2 percent, respectively).⁶⁰ The occupations in which workers have the highest likelihood of having a certification or license were healthcare practitioners and technical occupations (76.9 %), legal occupations (68.1 %), and education, training, and library occupations (55.5 %). In most fields, licenses were the predominant credential,⁶¹ and many of these are womandominated occupations.

Women are more likely to fill jobs in human service type occupations, like teaching, managers or nursing professions, which have more geographic flexibility than male dominated professions like engineers or scientists. ⁶² Because occupations traditionally held by women have a wider array of locations than traditionally male-dominated jobs, women are more likely to move for their partner's profession. ⁶³ Teaching, managing and nursing may have more geographic flexibility; however, those with licenses are less likely to move across state lines. ⁶⁴ When they do, they can be met with new requirements to enter a

Missouri is the 10th
highest incarcerating
state in the country
and has the 5th
highest female
incarceration rate.

affects their personal income and the economy.⁶⁵

Formerly Incarcerated

Occupational licensing requirements provide unique obstacles to some seeking professional registration. State licensing boards have the authority to refuse a license to anyone who has been incarcerated. In Missouri, an individual cannot be denied a license *primarily* because of a previous conviction, however conviction may be considered as "evidence of an absence of good moral character." The board can also take into account the nature and date of the crime. Missouri is the 10th highest

field in which they are already licensed, creating a barrier that





incarcerating state in the country and has the 5th highest female incarceration rate.⁶⁹ Approximately 32,000 individuals were in prison in Missouri in 2014.⁷⁰ In Missouri, women make up about 10% of the prison population, compared with only 7% nationwide.⁷¹ There are nearly 65,000 Missourians on community supervision through probation or parole and 23% of them are women.⁷²

In the year following release, up to 75 percent of people are still unemployed.⁷³ And one's yearly earnings decrease by 40 percent after they have been incarcerated.⁷⁴ Individuals with criminal records could face a substantial barrier to entering the workforce and may not be able to participate in the field at all.⁷⁵

Because of different state requirements, it can often be confusing for people who have been incarcerated to know if they are eligible to apply to receive a license. Creating a prescreening process for returned offenders could prevent many from wasting funds and time seeking a license they cannot obtain.

The Pew Charitable Trusts' Public Safety Performance Project and Pew's Economic Mobility Project recommends creating a screening process to determine who would be a risk to society in the field, and who would be low-risk to create a better chance for offenders to succeed after reentry. Also recommended was to proactively connect offenders to training programs while incarcerated and with follow-up programs after release to connect offenders with jobs.

Low-Income Populations

Low-income populations experience greater barriers from occupational licensing requirements when compared to middle and higher-income populations. Barriers to entry include the cost and time associated with training, education, and licensing fees. These expenses represent a higher proportion of income for low-income populations and might prevent individuals from entering the profession.⁷⁸ Lack of efficient reciprocity also poses a barrier, as the need for additional resources to get relicensed in another state can keep people from obtaining a new license. According to the Bureau of Labor Statistics, once people are licensed or certified they can expect higher wages then those who are not.⁷⁹

Some states address the licensing barrier to low-income populations by providing vouchers or waivers to individuals who do not have the resources to afford licensing fees. Florida waives licensing fees for applicants at or below 130 percent of the federal poverty level. ⁸⁰ In 2017, Kansas introduced legislation that would waive all occupational fees for state or federal assistance recipients and those whose income is lower than 130 percent of the federal poverty line. ⁸¹ It would also waive fees for military families, veterans and their spouses. ⁸² In March a Senate committee recommended the bill, but it was not voted on. ⁸³

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INNOVATIVE RECIPROCITY SOLUTIONS

While OL is controlled by each individual state, compacts may form to make reciprocity for certain occupations easier for individuals. Nursing, for example, has the Nursing Licensure Compact (NLC) that allows individuals to change their state of residency and continue to practice nursing.⁸⁴ The NLC consists of 25 states, making it one of the largest OL compacts in the United States. Read more about it here:

Case Study: Nursing - Compacted and Nationally Tested

For most licensed occupations, testing and licensing happens at the state level. Nursing, however, is different. The National Council Licensure Examination or NCLEX is a national exam every nurse must take in order to become licensed in his or her state.⁸⁵ The test is the same across state lines making state requirements for nursing the same.⁸⁶ There are two different NCLEX tests, one for Registered Nurses (RN) and one for Practical Nurses (PN). While this exam is nationally recognized, it is up to each state to locally enforce licensing, renewing of a license and reciprocity.⁸⁷

This standard is helpful to nurses because they do not need to meet any extra requirements when moving to another state; they simply reapply for a license in the state they are moving to.⁸⁸ The National Council of State Boards of Nursing (NCSBN) oversees all state boards of nursing in order to insure public health and safety.⁸⁹

Along with having a national exam and national board, states can be a part of the Nursing Licensure Compact. Twenty-five states are a part of the compact, which allows nurses to practice in multiple states at once. This is helpful for people who live close to state lines or people who work at an institution that offers services across state lines. If one moves to another compact state, they pay a fee (\$55 in Missouri) to change their primary state of residence, and they can still practice in all other compact states if need be.

The way nursing is licensed allows for reciprocity in every state, as the requirements are the same for every state. States do, however, set specific rules and regulations that are different in each state. For example, In Missouri, one can work for six supervised months, while he or she prepares for the NCLEX. 92 However, in Illinois, one cannot start working until he or she has passed the NCLEX and received notification; Illinois is also not a part of the NLC.93

There is some opposition to this type of licensing structure. While there is a compact for doctors, similar but not as encompassing as the NLC, some doctors and associations are not supporters of the structure.

94 Critics believe that the licensing reciprocity of a compact would diminish the states' ability to regulate practice.

95 The Association of American Physicians and Surgeons criticizes the structure of a compact, arguing that they are causing patients and physicians to suffer expenses without gaining value.

96





POLICY CONSIDERATIONS

The following table identifies policy and practice considerations related to occupational licensing and reciprocity. These considerations include expanding reciprocity at the individual, professional, or regional level, standardizing licensing requirements and collecting data to improve decision making and to increase the efficiency of the licensing process.

These changes could remove barriers to new Missouri residents seeking an occupational license, increase interstate mobility into Missouri, and provide licensing practices and systems that are more efficient for professionals.

	Reciprocity Considerations						
Expand reciprocity	Modeled on reciprocity policies for military spouses - new state residents could receive a permit for 180 days to allow them to immediately begin practicing in the state.						
Waive fees for low-income populations	Waive licensing fees for individual at or below 130% of the poverty level.						
Implement a pre-screening process for license seekers	All workers seeking a license could benefit from a pre-screening process to determine eligibility. This resource would be especially helpful for individuals who were formerly incarcerated to determine if their conviction restricts their ability to secure a professional license.						
Standardize licensing requirements	Match national average requirements or requirements of surrounding states to allow for easier reciprocity and increase mobility.						
Create and join national compacts	Modeled on the Nursing Licensure Compact - other professions could form licensing compacts for easier reciprocity.						
Create and join regional compacts	Modeled on the State Authorization Reciprocity Agreement for Distance Education - neighboring states or the region could form licensing compacts for easier reciprocity.						
Collect and analyze data to improve systems	Collect and analyze data to identify and address occupational licensing and reciprocity issues.						



Appendix A – Excerpts from: Johnson, E., et.al (Nov. 2016). *Occupational Licensing and Women Entrepreneurs in Missouri*.

OVERVIEW OF OCCUPATIONAL LICENSING IN MISSOURI

Missouri Statutes

The statutes that allow for occupational licensing in Missouri can be found in Chapter 324 (Occupations and Professions General Services) of the Missouri Revised Statutes⁹⁷. Chapter 324.001 contains the statutes that give the Division the power to create rules and regulations for the renewal of licenses, establish fees and licensing periods, and for clerical and financial control over general operations⁹⁸. Enumerated elsewhere in Section 324.001 are the powers for the Division to issue opinions on qualifications for licenses, appoint members to boards, and impose disciplinary measures on licensees, as well as the statutes of limitations on disciplinary measures⁹⁹. Additionally, statutes give power to the Division to enforce laws, as well as the power of appeal for applicants denied licensure.

Structure

The Missouri Division of Professional Registration is an arm of the Department of Insurance, Financial Institutions and Professional Registration, or the DIFP. According to the Division's website, it has a staff of 216, which provides administrative support to professional licensing boards¹⁰⁰. The 41 boards and commissions housed within the Division of Professional Registration represent a wide variety of businesses and professions in Missouri, for which they are in charge of licensing and discipline. The administrative structure of the Division is led by the Director of Professional Registration. The Director of Professional Registration are the Director of Human Resources, Chief Counsel, Chief Investigator of the Central Investigative Unit, Director of Budget and Legislation, and the Director of Financial Services all report to the Director of Professional Registration.¹⁰¹

Financially, the Division receives its entire budget from licensing fees and is completely independent of general funding¹⁰². The Division's purpose is to ensure that only the most qualified professionals receive occupational licensure. In doing this, they protect members of the public from unscrupulous business practices, as well as establish quality standards for Missouri's businesses and professionals to ensure they are adhering to Missouri law. According the Director of the Division of Professional Registration, recently the Division and boards have found ways to administer more efficiently and in some cases have reduced the fees collected from professionals. State statute indicates that no board can keep more than the equivalent of three years' operating expenses in reserve.¹⁰³

Boards and Commissions

The 41 boards and commissions that oversee occupational licensure in Missouri each report directly to the Division of Professional Registration. They are the administrative bodies largely responsible for issuing licenses, reviewing applications, and conducting investigations on licensed professionals and businesses.¹⁰⁴ Missouri licensing boards are as follows:

Administrative Boards (14)

- Dietitians
- Geologists
- Hearing Instrument Specialists
- Interior Design
- Sign Language Interpreters for the Deaf
- Marital and Family Therapists





- Occupational Therapy
- Private Investigators and Private Fire Investigator
- Professional Counselors
- Psychologists
- Real Estate Appraisers
- Respiratory Care
- Social Workers
- Therapeutic Massage

Non-Administrative Boards (13)

- Accountancy
- Architects, Engineers, Land Surveyors and Landscape Architects
- Chiropractic
- Cosmetology and Barber
- Dental
- Embalmers and Funeral Directors
- Healing Arts
- Nursing
- Optometry
- Pharmacy
- Podiatric Medicine
- Real Estate
- Veterinary Medicine

Advisory Boards (10)

- Acupuncturist
- Anesthesiology Assistants
- Assistant Physicians
- Athletic Trainer
- Behavior Analyst
- Dental Hygienists
- Perfusionists
- Physical Therapists
- Physician Assistants
- Speech-Language Pathologists and Audiologists

Other Regulated Professions (4)

- Athletics
- Athlete Agents
- Endowed Care Cemeteries
- Tattooing, Branding, and Body Piercing





Staffing

Most boards and commissions have an administrative staff ranging from two to eight people, of which one is an executive director and at least one is a processing technician. One of the primary roles is to address complaints and check for compliance. Some of the boards have their own dedicated investigators and inspectors, while others rely on the Central Investigative Unit of the Division to accomplish this ¹⁰⁵. The boards have the power to revoke and suspend licenses if the board has filed a complaint with the Administrative Hearing Commission and they have found cause for discipline. In the case where cause for discipline is found, in addition to the authority to suspend and revoke licenses, boards can censor, reprimand, or put a licensee on probation. ¹⁰⁶

The boards are reviewed by the state Auditor's Office, which examines adherence to statutes and regulations as well as implementing sound practices. The Auditor's Office evaluates each board as either excellent, good, fair or poor. The audits determine whether the board is performing the role it is designed to perform, if the board is operating at an optimal level of efficiency, and also evaluates financial records and budgets when applicable. The three main issues addressed in the audits are deficiencies in internal control, significant noncompliance in legal provisions, and significant deficiencies in management procedures and practices. ¹⁰⁷

Audits are conducted in accordance to the standards applicable to performance audits found in *Government Auditing Standards*. In cases when the auditor finds significant issues with how the board operates, they will make recommendations for how the board can improve and achieve their stated goals more effectively. All audits are available for citizen review on the state auditor's website: (http://app.auditor.mo.gov/AuditReports/AudRpt2.aspx?id=1).¹⁰⁸



Appendix B

Requirements and Average Salary by State: Massage Therapist								
State	License Requirements	Wage	Reciprocity Requirements					
Kansas	N/A	\$29,130	N/A					
Missouri	 500 hours MBLEx, NCCAOM, ABT, AMMANCE, NBCE or Exam approved by Board 	\$33,600	 Criminal background check. Copy of current license. Application and fee.					
Tennessee	• 500 hours • MBLEx	\$35,250	 500 hours of education OR certified through the National Certification Board of Therapeutic Massage and Bodywork, practicing for five years. Complete five hours training in regards to statutes and regulations. Have ten hours of ethics instruction. 					
Nebraska	 At least 19 years old Be of good moral character 1,000 hours ACE or MBLEx 	\$35,490	 Currently licensed elsewhere. Completed 1,000 hours of massage training. Pass Board-approved exam by NCBTMB or FSMTB. Pass the Board-developed jurisprudence examination. 					
Oklahoma	N/A	\$42,460	N/A					
Arkansas	 At least18 years old High school diploma/GED 500 hours MBLEx and State Law Exam 	\$42,780	Home state must have equivalent licensure requirements as those in AR.					
Kentucky	 At least 18 years old Is of good moral character 600 hours MBLEx, OH and NY State Exams 	\$43,100	 Holds a current license in another U.S. state, having standards equivalent to those of KY. Applicant may appeal for experience and education, or the board can determine equivalence. 					
Illinois	 At least 18 years old Must be of good moral character 600 hours MBLEx 	\$43,590	 At least 18 years old, and of good moral character. Must hold active license, in state with requirements equivalent to IL. 600 hours of instruction. Passing FSMTB or NCBTMB exam. Fingerprint processing. 					
lowa	At least 18 years old600 hoursMBLEx	\$43,660	 Current license meets requirements equivalent. Pass any NCBTMB exam. Provide license verification from any jurisdiction. 					





	Requirements and Average Salary by State: Speech-Language Pathologist							
State	Requirement	Wage	Reciprocity					
Nebraska	 Proof of citizenship or immigration status Master's degree, doctoral degree or equivalent 36 weeks of full-time professional experience Passage of a Praxis exam 	\$65,860	Current license meets requirements equivalent to Nebraska.					
Missouri	 Approved Master's or doctoral degree. Evidence of completion of coursework and clinical practicum equivalent to that required by the CAA Passage of the national examination for speech-language pathology and audiology 	\$69,140	 Licensed equivalent or more stringent standards than MO. License to a Certificate of Clinical Competence (CCC) holder. 					
Kansas	 Master's degree or equivalent. 400 hours supervised clinical practicum. Completion of supervised 9-month postgraduate professional experience Passage of a National Teachers Exam Specialty Area test administered by ETS 	\$70,150	 Evaluated by comparing qualifications met for original license and any subsequent licenses with the current qualifications for Kansas. No administrative or disciplinary actions pending 					
Kentucky	 Citizen of the United States or declared intention to apply for citizenship Master's degree or substantive equivalent education in the area of speech-language pathology or communication disorders. Nine months of full-time postgraduate professional experience Passage of a national Praxis exam in speech-language pathology 	\$71,720	 Letter of good standing, national certificate, or a passing score on the national exam, and a master's degree in communication disorders. Waive exam, grant licensure to applicants with national certification. 					
Iowa	 Master's degree in speech pathology or a master's degree or doctoral degree with a major in audiology. Completion of 400 hours of supervised clinical training, and not less than nine months of clinical experience under supervision. Passage of the Praxis exam. 	\$72,170	Licensed or certified in another state if those state requirements are substantially equivalent to lowa's.					





Arkansas	 Master's or doctoral degree in communicative disorders granted subsequent to January 1, 1993. Clinical summary signed by a program director verifying completion of practicum. Thirty-six weeks of supervised full-time (or equivalent part-time) paid professional experience Passage of the Praxis 	\$72,440	 Licensed with equivalent standards Grant a license to any CCC holder
Tennessee	 At least a master's degree in speech-language pathology from an accredited institution and a current CCC from ASHA, or Successfully complete and document a minimum of 400 clock hours of supervised clinical practicum Complete a clinical fellowship in speech-language pathology Pass Praxis test Pass jurisprudence exam 	\$72,680	Waive examination requirement for those applicants licensed in another state with equivalent standards.
Illinois	 Master's in speech-language pathology including 375 hours of clinical practicum. Passage of the Praxis exam Completion of the equivalent of nine months of supervised experience ASHA Certificate of Clinical Competence (CCCs) or American Board of Audiology (ABA). 	\$75,590	Licensed with equivalent standards.
Oklahoma	 Master's degree or equivalent with a major emphasis in speech-language pathology. 400 hours supervised practicum Nine months, supervised, approved, full-time, paid, postgraduate professional experience. Pass examinations approved by the Board of Examiners Attest to status as a U.S. citizen, a U.S. non-citizen national, or a qualified alien Have not committed any acts for which disciplinary action may be justified A minimum of three references from licensed, ASHA certified or equivalent credentialed speechlanguage pathologist is required in support of each application Criminal background check and citizenship affidavit are required 	\$81,020	 Licensed with equivalent standards and has proof of good standing Waive the request for transcripts, the clinical experience and exam and grant a license to holders of ASHA's CCC.





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Appendix C: Multi-State Comparison

The Institute conducted a multi-state analysis of occupational licensing in surrounding states for comparison purposes.

Methodology:

The Institute began by collecting data on all of the professions which are licensed in each of the following states: Arkansas, Illinois, Iowa, Kansas, Nebraska, and Missouri. Duplications and subcategories were collapsed into a list of approximately 139 occupations that are licensed in at least one of the six comparison states. In an analysis of just these professions, Nebraska licensed the most with 97 professions, Kansas was the lowest with 48, while Missouri licenses 68 of these professions.

Professions	Arkansas	Illinois	Iowa	Kansas	Missouri	Nebraska	Total
Accountancy	1	1	1	1	1	1	6
Acupuncturist	1	1	1	1	1	1	6
Adoption Investigator			1				1
Alarm (Firearm Trainers and Security Personnel)		1					1
Amusement Ride Operator			1				1
Anesthesiologist Assistants		1		1	1		3
Appraisers, Real Estate	1	1	1		1	1	5
Arch., Engr., Surveyors & Landscape Arch.	1	1	1	1	1	1	6
Assessor, County						1	1
Athlete Agents		1			1	1	3
Athletic Trainer	1	1	1	1	1	1	6
Athletics (Boxing, professional wrestling)		1	1		1	1	4
Auction		1					1
Audiologist		1	1		1	1	4
Bail Enforcement Agent	1	1	1	1	1	1	6
Bank Executive Officer						1	1
Behavior Analysts			1	1	1		3
Boiler Operator	1		1			1	3
Broker Dealer/Securities/Broker Dealer Agent	1	1	1	1	1	1	6
Bulk Milk Hauler/Sampler		1	1	1	1	1	5





Bus Driver/Commercial Driver	1	1	1	1	1	1	6
Canine Handler		1					1
Certified Compulsive Gambling Counselor			1	1		1	3
Certified Special Population Specialist						1	1
Chiropractic	1	1	1	1	1	1	6
Commercial Explosives and Individual Blaster			1		1		2
Commercial Dog or Cat Breeder/Dealer			1		1	1	3
Community Association Manager		1					1
Contractors/Subcontractors	1		1			1	3
Cosmetology & Barber	1	1	1	1	1	1	6
Counselors, Professional	1	1	1	1	1	1	6
County Highway/City Street Superintendent						1	1
Dental/Dentist	1	1	1	1	1	1	6
Dietitians	1	1	1	1	1		5
Doctor of Medicine, Physician, Surgeon	1	1	1	1	1	1	6
Driver Safety Course Instructor						1	1
Drug Distributor		1			1		2
Education Administrator	1	1	1	1	1	1	6
Electrician	1		1			1	3
Electrology Instructor						1	1
Elevator Inspector			1			1	2
Embalmers & Funeral Directors	1	1	1	1	1	1	6
Employment Agent						1	1
EMT			1		1	1	3
Engineer Interns	1				1		2
Environmental Health Practitioner		1		1		1	3
Esthetician Instructor						1	1
Euthanasia		1					1





Farm Labor Contractor						1	1
Fire Alarm Inspector						1	1
Fire Protection Contractors and Installers			1				1
Fire Sprinkler Contractor						1	1
Forester	1						1
Geologist	1	1		1	1	1	5
Hearing Instrument Specialists	1		1		1	1	4
Horse Trainer						1	1
HVAC			1				1
Hydronics			1				1
Industrial Hygienist						1	1
Insurance Producer		1	1	1	1	1	5
Interior Design	1	1	1		1		4
Investment Advisor Representative	1		1		1	1	4
Jockey						1	1
Land Sales Developer		1					1
Land Surveyors In Training		1			1		2
Law Enforcement Officer						1	1
Lawyer	1	1	1	1	1	1	6
Lead Abatement Contractor/Project		1	1		1	1	4
Designer/Worker							
Lobbyist						1	1
Locksmith		1					1
Mail Order Ophthalmic Provider		1					1
Manure Applicator, Confinement			1				1
Manure Service Representative, Commercial			1				1
Marital & Family Therapists	1	1	1	1	1	1	6
Massage	1	1	1		1	1	5
	1		1			•	





Motor Vehicle Salesperson/Dealer	1	1	1	1	1	1	6
Notary Public						1	1
Nurse Assistant (C.N.A)		1	1		1	1	4
Nursery Stock Distributor						1	1
Nursing (RN, APRN)	1	1	1	1	1	1	6
Nursing Home Activity Director			1				1
Nursing Home Administrator	1	1	1		1	1	5
Occupational Therapy	1	1	1	1	1	1	6
Occupational Therapy Assistant	1		1	1	1	1	5
Optometry	1	1	1	1	1	1	6
Orthotist/Prosthetist	1	1	1				3
Paid Dining Assistant						1	1
Pedorthist	1	1	1				3
Perfusionists	1	1			1	1	4
Pesticide Applicator	1	1	1	1	1	1	6
Pesticide Dealer	1	1	1	1	1	1	6
Pharmacy	1	1	1	1	1	1	6
Pharmacy Interns	1				1		2
Pharmacy Technician		1	1		1	1	4
Physical Therapist Assistant	1	1	1	1	1	1	6
Physical Therapists	1	1	1	1	1	1	6
Physician Assistants	1	1	1	1	1	1	6
Pilot						1	1
Podiatric	1	1	1	1	1	1	6
Polygraph Examiner						1	1
Private Investigator and Private Fire Investigator	1	1	1	1	1	1	6
Private Security Agent			1				1
Professional Employer Organization (Services)						1	1





Professional Engineer	1	1	1	1	1	1	6
Psychologists	1	1	1	1	1	1	6
Race Horse Identifier/Tattooer						1	1
Race Horse Owner						1	1
Race Horse Stable Attendant						1	1
Racing Worker/Riverboat Gambling Worker		1	1		1	1	4
Radiologic Technologist	1	1	1	1	1	1	6
Radon Measurement Specialist		1	1			1	3
Radon Mitigation Specialist		1	1				2
Real Estate (Agent, Broker)	1	1	1	1	1	1	6
Respiratory Care	1	1	1	1	1	1	6
Roofing Contractor		1		1			2
Sanitary Landfill Operator			1				1
Seed Dealer	1						1
Sex Offender Evaluator		1					1
Shorthand Reporter		1	1			1	3
Sign Language Interpreters for the Deaf			1		1	1	3
Social Workers	1	1	1	1	1	1	6
Solid Waste Incinerator Operator			1				1
Speech-Language Pathologists	1	1	1	1	1	1	6
Surgical Assistant		1					1
Surgical Technologist		1					1
Swimming Pool Operator						1	1
Tattooing, Body Piercing & Branding	1		1	1	1	1	5
Taxi Driver			1				1
Teaching	1	1	1	1	1	1	6
Trailer Only Dealer						1	1
Veterinary	1	1	1	1	1	1	6





Veterinary Technician		1	1		1	1	4
Viatical Settlement Broker			1			1	2
Wastewater Lagoon Operator			1				1
Wastewater Treatment Operator			1				1
Water Distribution Operator			1				1
Water Treatment Operator			1			1	2
Water Well Driller						1	1
Well Contractor/Provisional Well Contractor			1				1
Total	57	75	88	48	68	97	





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