



Proposed List of Regulated Occupations for CY 2026 Periodic Review

The Office of Professional Licensure Review submits this list in compliance with **Title 13-1b-303** of the Utah Code.

Introduction

Created by SB 16 (2022), the Office of Professional Licensure Review (OPLR) within the Department of Commerce is directed to provide the Utah Legislature with objective review and recommendations related to occupational licenses. Specifically, OPLR shall “conduct a review of each regulated occupation at least once every 10 years”. To ensure that OPLR’s periodic reviews of existing occupational licenses are aligned with legislative priorities, Title 13-1b requires that OPLR submit by October 1st each year “a list of each periodic review that the office proposes to conduct during the upcoming year.” This list is reviewed by the Business and Labor Interim Committee and approved, with or without modification. It is then submitted to the Legislative Management Committee for approval, with or without modification.

The next sections present the list of occupations proposed for review by OPLR during CY 2026 and outline the scope of the review. The proposed methodology for conducting OPLR’s review is available in Appendix II.

OPLR’s approach to prioritizing occupational licenses is also below. OPLR shares this framework to help create a sequenced, multi-year review cycle—jointly with the legislature—that seeks the greatest potential impact on public well-being in Utah.

Proposed List of Occupations & Licenses for Review

For CY 2025, OPLR is reviewing nursing and allied health professions (comprising ~72,500 currently active licensees in Utah¹). See Appendix III for a comprehensive list of these occupations and licenses under review in CY 2025.

As mentioned in various legislative committees, OPLR is now proposing to complete its review of all healthcare related occupations by reviewing the remaining occupations listed here (see more in Appendix I).

Department of Commerce

- Anesthesiologist Assistant (8 active licensees) Section 58-70b
- Chiropractic Physician (1,110) Section 58-73
- Dental Hygienist (4,155) Section 58-69
- Dentist (3,871) Section 58-69
- Dietitian (1,610) Section 58-49
- Genetic Counselor (506) Section 58-75
- Health Facility Administrator (371) Section 58-15
- Medical Language Interpreter (64) Section 58-80a

¹ Active licensee count. DOPL. (as of August 2025). https://db.dopl.utah.gov/licensee_count.html

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| • Naturopathic Physician (156) | Section 58-71 |
| • Optometrist (682) | Section 58-16a |
| • Osteopathic Physician & Surgeon (2,442) | Section 58-68 |
| • Pharmacy Technician (8,796) | Section 58-17b |
| • Pharmacist (4,494) | Section 58-17b |
| • Physician & Surgeon (15,329) | Section 58-67 |
| • Podiatric Physician (280) | Section 58-5a |
| • Radiologic Technician (4,311) | Section 58-54 |

The intent of reviewing all healthcare occupations in a two-year period is to ensure that OPLR has the best understanding possible of each occupation, their interconnections, and healthcare overall.

OPLR has been asked to consider Medical Assistant and Surgical Technician for a sunrise review and OPLR will do so as part of the periodic review.

Additionally, some elements of regulation of advanced practice providers such as APRNs and PAs will need to be considered jointly with physicians licensing. OPLR may recommend additional changes to the CY 2025 occupations (nursing and allied) after the 2026 review, as these occupations (and healthcare generally) are complex, interconnected professions.

Scope of Review

OPLR's proposed review of multiple related healthcare occupations will consider a variety of options related to licensing for those occupations, such as the type of occupational regulation (e.g., registration, certification, licensing), entry qualifications for licensure, continuing education requirements, exemptions from licensing, and scope of practice. In all cases, the reviews will be conducted in accordance with Title 13-1b-302.

With the recent passage of HB474 (2024), OPLR has taken two steps to ensure that our reviews meet the statutory requirements set out in Title 13-1b. First, the office created a framework based on the statutory review criteria in 13-1b-302 which sequences the statutory criteria and other data inputs to ensure that OPLR is applying the same criteria in the same way to each occupation under review (contact the office to learn more). Second, OPLR has included a systematic rule review as a part of each review and report.

The comprehensive nature of a review should not be confused with comprehensive recommendations for change. OPLR may conduct a comprehensive review and suggest modest or no changes to licensing law or practices.

Prioritization of Reviews

In proposing a list of occupations for periodic review each year, OPLR will seek to prioritize reviews of multiple related occupations. Reviewing a set of closely related occupations simultaneously allows for a deeper understanding of the occupations and avoids redundant effort. Beyond efficiency, OPLR will propose reviews based on:

- **Overlapping or interrelated scopes of practice.** Many occupations have overlapping scopes of practice (e.g., advanced practice registered nurses, physician assistants, and physicians). In these cases, addressing one occupation without

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reference to the scope of practice of the related occupations could result in poor policy recommendations.

- **Large impact on the Utah public.** Regulated occupations with higher numbers of licensees, and those operating in critical functions have more impact on Utah's public than occupations with fewer licensees, and those operating in less critical areas. The former occupations will be prioritized for earlier review by OPLR.

Future reviews, then, may include groupings of occupations such as trades (e.g., contractors, plumbers, electricians, engineers/land surveyors, interior design), real estate (e.g., brokers, sales agents, mortgage originators, appraisers), or teachers (e.g., elementary teachers, special education teachers, school psychologists).

OPLR has created a hypothetical 10-year cycle of periodic reviews to ensure that each occupation can be reviewed as required in statute.

APPENDIX

- I. Table of 2026 proposed occupations, licenses, active licensees
- II. Proposed methodology for periodic review
- III. Table of 2025 review occupations, licenses, active licensees, and complaint index

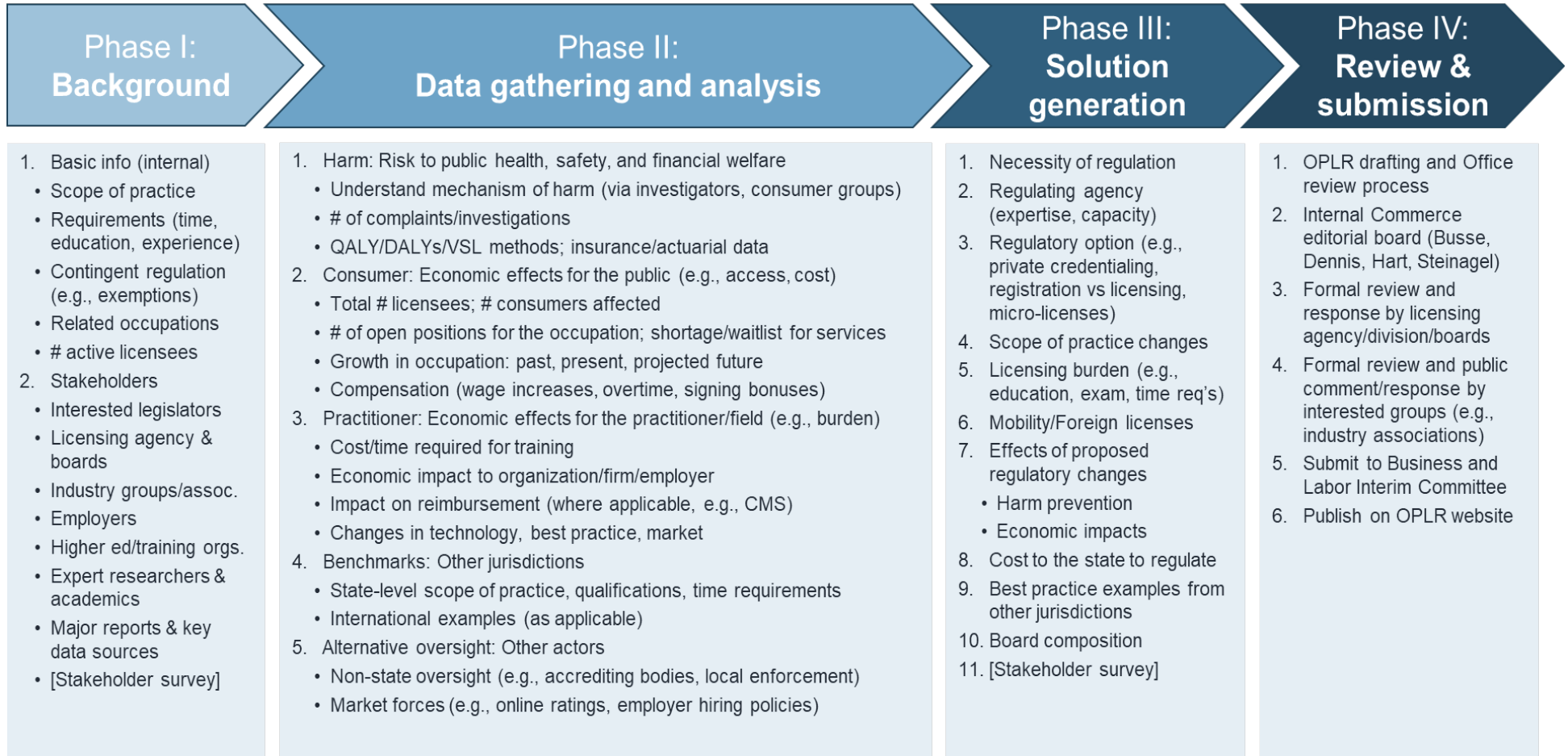
I. Table of 2026 proposed occupations, licenses, active licensees

Occupation	Licenses	Active Licensees (As of August 2025)
Physician & Surgeon	Physician & Surgeon	12,846
	Physician & Surgeon MB	2,472
	Temporary Physician & Surgeon	1
	Volunteer Physician & Surgeon	9
	Volunteer Physician/Surgeon CS	1
Osteopathic Physician & Surgeon	Osteopathic Physician & Surgeon	1,937
	Osteopathic Physician & Surgeon MB	505
Chiropractic Physician	Chiropractic Physician	1,110
Podiatric Physician	Podiatric Physician	278
	Volunteer Podiatric Physician	2
Anesthesiologist Assistant	Anesthesiologist Assistant	5
	Anesthesiologist Assistant CS	3
Naturopathic Physician	Naturopathic Physician	102
	Naturopathic Limited CS Testosterone	54
Dentist	Dentist – Local Anesthesia Permit	2,422
	Dentist – Minimal Sedation Permit	976
	Dentist – Moderate Sedation Permit	318
	Dentist – Deep Sedation & General Anesthesia Permit	145
	Volunteer Dentist Controlled Substance	2
	Volunteer Dentist – Local Anesthesia Permit	8

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Dental Hygienist	Dental Hygienist	137
	Dental Hygienist w/ Local Anesthesia	4,018
Optometrist	Optometrist	680
	Optometrist Diagnostic Only	1
	Volunteer Optometrist	1
Pharmacist	Pharmacist	4,471
	Temporary Pharmacist	18
	Volunteer Pharmacist	4
	Volunteer Pharmacist CS	1
Pharmacy Technician	Pharmacy Technician	7,131
	Pharmacy Technician Trainee	1,665
Radiologic Technician	Radiologic Technologist	3,768
	Radiologist Assistant	11
	Radiology Practical Technician	532
Medical Language Interpreter	Certified Medical Language Interpreter	64
Genetic Counselor	Genetic Counselor	504
	Temporary Genetic Counselor	2
Dietitian	Certified Dietitian	1,610
Health Facility Administrator	Health Facility Administrator	371

II. Proposed methodology for periodic review



III. Table of 2025 review occupations, licenses, active licensees, and complaint index

Occupation	Licenses	Active Licensees (As of September 2024)	Complaint Index* (Substantiated complaints per 100 active licensees) **
<i>Division of Professional Licensure</i>			
Nurse	Registered Nurse	46,795	4.13
	Licensed Practical Nurse	2,457	
	Registered Nurse Apprentice	355	
	Medication Aide Certified	91	
	APRN	6,341	
	APRN-CRNA Controlled Substance	460	
	APRN-CRNA without PP	461	
Occupational Therapist	Occupational Therapist	1,502	1.53
	Occupational Therapy Assistant	552	
Physical Therapist	Physical Therapist	3,237	1.58
	Physical Therapist Assistant	1,173	
	Temporary Physical Therapist	3	
	Temporary Physical Therapist Assistant	1	
Physician Assistant	Physician Assistant	2,939	7.49
	Temporary Physician Assistant	1	
Acupuncture	Licensed Acupuncturist	199	9.43
Athletic Trainer	Athletic Trainer	837	1.68
Speech/Audiology	Audiologist	417	0.93

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Instrument	Speech Lang Pathologist & Audiologist	16	
	Speech Language Pathologist	1,624	
	Temp Speech Language Pathologist	69	
Hearing Instrument	Hearing Instrument Intern	41	7.89
	Hearing Instrument Specialist	162	
Midwife	Certified Nurse Midwife	237	n/a
	Direct-Entry Midwife	81	15.79
Medication Aide Certified	Medication Aide- Certified	91	9.01
Respiratory Care	Respiratory Care Practitioner	2,613	1.45

* DOPL median complaint (last 10 yrs) per 100 active licensees is 5.2

** Denominator used to calculate the complaint index was avg. # of licensees over the last 10 yrs