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2/27/2024

Christopher C. Jones  
Board of behavioral Sciences  
1625 N Market Blvd-S200  
Sacramento, CA 95834

**RE: Request for Adoption of the National MFT Exam**

Dear Chairperson Jones and Board:

On behalf of the 36,000 members of the California Association of Marriage and Family Therapists ("CAMFT"), we are again writing to ask that the Board of Behavioral Sciences ("BBS") adopt the National MFT Exam as administered by the Association of Marital and Family Therapy Regulatory Board ("AMFTRB").

CAMFT Advocating for National Exam Adoption

The National Exam administered by AMFTRB serves as a professional licensure tool for those seeking to become licensed marriage and family therapists. California is currently the only state of fifty that has its own state clinical exam and has not adopted the National Exam. CAMFT's Board of Directors has voted in favor of supporting the adoption of AMFTRB's National Exam in hopes of relieving some of the struggles and limitations the MFTs of California are currently facing.

CAMFT has been assessing this change for many years, with numerous Board of Directors and member surveys, contributing to the analysis and discussion. And, in June 2023, the CAMFT Board voted to pursue and advocate for California to transition to the National Exam as a priority. Moreover, in August 2023, CAMFT formally requested the BBS to begin discussions on adoption of the AMFTRB Examination.

Necessity of National Exam

Here are a few of the reasons that CAMFT has moved in the direction of advocating for a change to the National Exam:

1. **License Portability for CA MFTs:** The American Association for Marriage and Family Therapists (AAMFT) is working closely with CAMFT as we navigate license portability for California MFTs and the barriers that California MFTs face. Common challenges we have seen so far:
  - o *State Hesitation with California Exam:* The goal of the National Exam is to ease the process of

obtaining multiple state licensures. The National Exam allows MFTs to have standardized qualifications for out-of-state applicants. Since California has its own state exam, our licensure requirements may differ from those of other states. This has led to challenging conversations with other states on exemptions for California-licensed MFTs. CAMFT has specifically been told of other states' hesitation on working with California due to the use of the California clinical examination. While CAMFT believes AAMFT/CAMFT can overcome this hurdle with some states, the understanding that California is moving towards a National Exam is likely to result in an easier transition for states hesitant to have one law for 49 other states, and an exemption for California.

- *Telehealth Expansion:* As telehealth has/is becoming increasingly utilized, it is providing increased opportunities for therapists to expand their practice, assist in the access to care crisis, and allow for greater flexibility for provider and patient. However, California licensees are a disadvantage when seeking licensure in other states due to having not taken the National Exam.
  - *Consumer protection for Californians:* Adopting the National Exam would allow a streamlined process for California licensees to acquire licensure in another state. Subsequently, this would assist therapists who maintain residences in multiple states gain greater clarity of their ability to continue seeing California patients, allow California-based therapists to continue their work with their clients when the clients maintain multiple residences, and bolster a solution to a common problem of California therapists struggling with the jurisdictional issue when a client group resides in different states (i.e., child lives in California and Parent B lives in Texas).
  - *Increased cost and hurdles for MFTs:* Obtaining licenses in different jurisdictions can usually come along with the requirements for additional exams, exam fees and supervised practice hours. These requirements and the application processing can be very time consuming and can result in potential delays of continuity of care, putting a hindrance on both MFTs and their patients in their care.
- 2. Federal Advocacy:** On a federal level, CAMFT has actively pushed for special considerations due to the absence of the National Exam when advocating on various federal-level job specifications. Although CAMFT has been able to achieve some success, it has always required a significant amount of financial and human effort to ensure that the language of the California examination requirements is included and recognized. CAMFT believes that a change to the National Exam can only help in the advocacy efforts for MFT recognition, especially for California MFTs.

#### Concerns Regarding Racial Bias in Exams

CAMFT recognizes and appreciates the concerns raised regarding the racial biases observed in connection with the standardized exams. CAMFT also supports assessment and analysis of any bias (racial or otherwise) within any standardized exam taken by those regulated by the BBS.

The concerns of biases in standardized exams, specifically in the MFT field, stem from the possibility of these tests inadvertently displaying disadvantages to certain groups of test takers. Biases can be shown in different forms. This includes cultural, socioeconomic, and linguistic biases, which can have an unfair impact on individuals from specific backgrounds.

Although CAMFT does not take these concerns lightly, it is still our belief that the positive results of adopting the National Exam will outweigh the negatives being assessed. Forty-nine states as well as their territories, including the District of Columbia and Guam, utilize the National Exam. Having the highest number of MFTs in the nation, California is the only outlier which results in a direct disadvantage to all California MFTs, as the rest of the nation moves forward with license portability and telehealth.

CAMFT believes with the adoption of the National Exam this will allow us to establish consistency across all states. This will facilitate the nationwide growth of behavioral healthcare workers by removing an extra barrier for California therapists to pursue licensure in other states, as well as alleviate difficulties linked to federal-level advocacy for MFTs.

CAMFT fervently supports continued and increased review of any exam administered to MFTs, be it the California exam or the National Exam. CAMFT has been in communication with AMFTRB to inquire about increased and continued assessment and investigation about bias within their standardized exam. CAMFT would be very willing to partner with any examine entity to help figure out ways to lessen biases found in standardized testing and to help bring light to this important issue.

With careful consideration of this issue, we still believe movement forward towards the transition to the National Exam would be a critical step for the MFTs of California and will open an array of job opportunities for our clinical professionals. While it is critical to acknowledge any biases within the exam which may cause unintentional disadvantages to certain candidates; it is also important to note that as this assessment is underway, we need to put California MFTs in the best position possible to succeed, find job security, and ensure timely access to the mental health consumer. Adopting the National Exam would align California with national standards, eliminate inconsistencies, exhibit our desire for fairness and inclusion, and ensure the most qualified practitioners are providing mental health services to those in need.

In conclusion, CAMFT requests that the BBS agendize transitioning to the National Exam for Marriage and Family Therapists. Thank you for your attention to this very important matter and we are here to provide any further assistance or information you may need.

Sincerely,



Joy Alafia, MBA, CAE  
Executive Director



Catherine L. Atkins, J.D.  
Deputy Executive Director