



Board of Behavioral Sciences

Memo

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To: Workforce Development Committee **Date:** July 25, 2025

From: Steve Sodergren, Executive Officer

Subject: **Discussion and Possible Recommendations Regarding Education Requirements for Licensed Marriage and Family Therapists (Business and Professions Code (BPC) §§4980.36, 4980.37, 4980.41, 4980.74, 4980.78, 4980.81)**

During its last meeting, the committee discussed conducting a comprehensive review of the education requirements for Licensed Marriage and Family Therapists (LMFTs). The goal of this review is to identify ways to eliminate any confusion and inequalities resulting from the current multi-pathway structure of LMFT education requirements.

Background

In 2010, the LMFT education requirements were amended in response to the passage of the Mental Health Service Act (MHSA). The MHSA emphasized wellness, client/driven systems, and culturally competent public mental health care. These amendments transitioned the education requirements from a content-based model to a more competency and integrated degree model. Additionally in 2014, the board established a pathway for individuals who earned their degrees from out-of-state institutions. Currently, there are three primary educational pathways for LMFT applicants:

- **Pre-2012:** In-state degrees completed by those who began graduate study before August 1, 2012. (BPC §§ 4980.37, 4980.41)
- **Post-2012:** In-state degrees completed by those who began graduate study on or after August 1, 2012. (BPC § 4980.36)
- **Out-of-state (OOS):** Out-of-State degrees, regardless of date, governed by “substantial equivalency” standards. (BPC §§ 4980.78, 4980.81)

The Pre-2012 and OOS requirements seek to ensure that an applicant’s education is comparable to Post-2012 requirements and allows for the remediation of any gaps that may exist.

When considering the education requirements for LMFT licensure it will be important for the committee to consider the following three questions:

1. Does a degree program need to be an integrated course of study?

The requirement for an integrated degree program has created challenges for out-of-state applicants who may have received equivalent training through separate, modular coursework but are excluded if their program is not formally classified as integrated. Additionally, the term “integrated degree” lacks a consistent definition across jurisdictions, causing confusion for applicants and students and placing the burden on the Board to interpret and evaluate coursework on a case-by-case basis.

2. Should the education requirements focus on content, competency or both?

Content requirements and competency requirements differ in both focus and evaluation. Content requirements specify the subjects or courses a student must complete, such as human development, law and ethics, or psychotherapy. These are objectively verified through course titles and unit counts on a transcript, ensuring that the students has been exposed to specific topic areas. In contrast, competency requirements focus on what the student is able to do with their education such as conducting assessments, applying ethical standards, or developing treatment plans. Rather than just verifying course completion, competency-based education assesses whether students have mastered and can apply the necessary skills and knowledge for professional practice.

3. Is it feasible to define a degree program as in-state or out-of-state?

Historically, the Board has classified institutions as in-state or out-of-state based on their physical location. With the rise of online graduate programs, this method is no longer feasible, causing confusion about the licensure pathways and coursework remediation. For example, Post-2012 in-state applicants cannot remediate education, while out-of-state applicants can remediate 12 to 18 units while registered as associates.

Comparison of Key Educational Components

Staff has reviewed and compared each pathway to identify existing standards and potential differences that could create barriers or confusion. The following are the key components to the LMFT education requirements that will guide future discussion (**Attachment A**):

1. **Accreditation:** Post-2012 degrees must be from institutions “...approved by the Bureau for Private Postsecondary Education or accredited by either the Commission on Accreditation for Marriage and Family Therapy Education, or a regional or national institutional accrediting agency that is recognized by the

United States Department of Education.” Unlike Post-2012, Pre-2012 requirements do not name the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE) as a specific accrediting agency that is acceptable. OOS degree requirements simply state that the degree must be from an accredited or approved institution.

2. **Degree Title:** Both Pre-2012 and Post-2012 require that the degree must be in “...marriage, family, and child counseling, marriage and family therapy, couple and family therapy, psychology, clinical psychology, counseling psychology, or either counseling or clinical mental health counseling with an emphasis in either marriage, family, and child counseling or marriage and family therapy.” For OOS state degrees the degree title does not need to be identical to those that are required for in-state degrees but must be “substantially equivalent” to what is required for an in-state degree.
3. **Degree Units:** Pre-2012 and OOS degrees are required to have a minimum of 48 semester units or 72 quarter units. Post-2012 degrees are required to be a minimum of 60 semester units or 90 quarter units.
4. **Remediations:** For applicants with Pre-2012 degrees, remediation focuses on ensuring that the applicant has completed any necessary coursework now required under the current standards but not required at the time their degree was earned. For OOS degree holders, remediation is more comprehensive. Because OOS programs may not align with California’s specific statutory and regulatory content and competency requirements, these applicants are evaluated under “substantial equivalency” standards. All applicants, except Post-2012 degree holders, can remediate any gaps in education (e.g. child abuse assessment, spousal/partner abuse, or California Law & Ethics) while a registrant, but must complete all required when applying for licensure.
5. **Practicum:** Pre-2012 degrees require 6 semester or 9 quarter units and 150 face-to-face experience hours. Post-2012 and OOS degrees require 6 semester or 9 quarter units and 225 face-to-face hours, with up to 75 hours allowed in client centered advocacy. If an out-of-state applicant is currently licensed in another state at the highest level and they are exempt from this requirement.
6. **Core Content and Competencies:** The LMFT education requirements for each pathway are currently dispersed across various statutes and regulations. This fragmented structure can make it challenging for applicants, educators, and other stakeholders to navigate and fully comprehend the requirements. Additionally, there is no standardized language defining the competency areas needed for each pathway.

Suggested Approach

To establish consistent and equitable standards for the LMFT education requirements the committee should consider creating a single pathway for education based upon the comprehensive and updated requirements for Post-2012 outlined in BPC § 4980.36. This section reflects a modern, integrated model that includes essential competencies such as trauma-informed care, cultural responsiveness, public mental health principles, and evidence-based practice.

In considering changes to the LMFT education requirements, the committee will need to consider taking the following actions:

- Identify the core content areas for LMFT licensure, including required coursework topics and unit totals.
- Define the core competencies essential for safe and competent service delivery in California and ensure consistent use of terminology across statutes and regulations.
- Determine whether a qualifying degree must be an integrated degree program.
- Clearly define which content areas are eligible for remediation and establishing whether remediation must be completed prior to registration and if it may be satisfied through continuing education or graduate-level coursework.
- Ensure that practicum requirements are clearly defined, aligned with national standards, and provide students with sufficient clinical experience.

Recommendation

Conduct an open discussion on the approach to reviewing LMFT education requirements, including identifying any additional areas of concern. Direct staff to review LMFT education requirements in other states, as well as standards set by LMFT accrediting agencies, and to develop draft language for further consideration and discussion.

Attachments

Attachment A: LMFT Education Pathways Comparison

LMFT EDUCATION PATHWAY COMPARISON				
	PRE-2012	POST-2012	OOS Pre-2012	OOS Post-2012
ACCREDITATION	<ul style="list-style-type: none"> • Regional or National Institutional Accrediting Agency that is recognized by the U.S. Department of Education • Approved by the Bureau for Private Postsecondary Education • Exempt if accredited by the Commission on Accreditation for Marriage and Family Therapy Education (COAMFTE) 	<ul style="list-style-type: none"> • Regional or National Institutional Accrediting Agency that is recognized by the U.S. Department of Education • Approved by the Bureau for Private Postsecondary Education 	Accredited institution or approved institution.	Accredited institution or approved institution.
DEGREE	<ul style="list-style-type: none"> • Marriage, Family, and Child Counseling • Marriage and Family Therapy • Couple and Family Therapy • Psychology • Clinical Psychology • Counseling/Clinical Mental Health Counseling with an emphasis in either Marriage, Family, and Child Counseling or Marriage and Family Therapy • Exempt if accredited by the Commission on Accreditation for Marriage and Family 	<ul style="list-style-type: none"> • Marriage, Family, and Child Counseling • Marriage and Family Therapy • Couple and Family Therapy • Psychology • Clinical Psychology • Counseling/Clinical Mental Health Counseling with an emphasis in either Marriage, Family, and Child Counseling or Marriage and Family Therapy 	Degree title does not need to be identical to that required by 4980.36.	Degree title does not need to be identical to that required by 4980.36.

	Therapy Education (COAMFTE)			
UNITS	48 Semester/72 Quarter units	60 Semester/90 Quarter Units	48 Semester/72 Quarter Units	48 Semester/72 Quarter Units (Can Complete 12 Semester Units/18 Quarter Units Prior to Approval for Licensure (During Registration)
REMIEDIATION	Can Complete Additional Coursework Prior to Approval for Licensure (Registration)	None	Can Complete Additional Coursework Prior to Approval for Licensure (Registration)	Can Complete 12 Semester/18 Quarter Units of Coursework and Additional Coursework Prior to Approval for Licensure (Registration)
PRACTICUM	(BPC § 4980.37(c)(1)) 6 Semester/9 Quarter units	(BPC § 4980.36(d)(1)(B)(i)) 6 Semester/9 Quarter Units	6 Semester/9 Quarter Units	6 Semester/9 Quarter Units
PRACTICUM/FACE TO FACE	(BPC § 4980.37(c)(2)) 150 Hours	(BPC § 4980.36(d)(1)(B)(ii & vi)) 225 Hours Face to Face Counseling Experience (up to 75 hours may be Client Centered Advocacy)	225 Hours Face to Face Counseling Experience (up to 75 hours may be Client Centered Advocacy) or Holds a Current License in Good Standing in Another State or Country as an LMFT at the Highest Level	225 Hours Face to Face Counseling Experience (up to 75 hours may be Client Centered Advocacy) or Holds a Current License in Good Standing in Another State or Country as an LMFT at the Highest Level
MARRIAGE, FAMILY, AND CHILD COUNSELING AND MARITAL AND FAMILY SYSTEMS APPROACHES TO TREATMENT	(BPC § 4980.37(b)) 12 Semester/18 Quarter Units	(BPC § 4980.36(d)(1)(A)) 12 Semester/18 Quarter Units	12 Semester/18 Quarter Units	12 Semester/18 Quarter Units
MENTAL HEALTH RECOVERY ORIENTED CARE AND METHODS OF SERVICE DELIVERY			(BPC § 4980.78(b)(4)(A)) 3 Semester Units/45 hours	(BPC § 4980.78(b)(4)(A)) 3 Semester Units/45 hours
DIAGNOSIS, ASSESSMENT,	(BPC § 4980.37(e)(1)) Integrated	(BPC § 4980.36(e)) Integrated	ADDITIONAL COURSEWORK	ADDITIONAL COURSEWORK

PROGNOSIS, TREATMENT PLANNING AND TREATMENT OF MENTAL HEALTH DISORDERS			(BPC § 4980.81(a)(1)) 2 Semester Units	(BPC § 4980.81(a)(1)) 2 Semester Units
CROSS CULTURAL MORES AND VALUES, INCLUDING A WIDE RANGE OF RACIAL AND ETHNIC BACKGROUNDS	(BPC § 4980.37(e)(7)) Integrated	(BPC § 4980.36(d)(2)(B)) Integrated		
CALIFORNIA CULTURES AND THE SOCIAL AND PSYCHOLOGICAL IMPLICATIONS OR SOCIOECONOMIC POSTION	(BPC § 4980.37(e)(6)) Integrated	(BPC § 4980.36(d)(2)(C)) Integrated	(BPC § 4980.78(b)(4)(B)) 1 Semester Unit/15 Hours Can be completed while registered.	(BPC § 4980.78(b)(4)(B)) 1 Semester Unit/15 Hours Can be completed when registered.
MULTICULTURAL DEVELOPMENT AND CROSS-CULTURAL INTERACTION		(BPC § 4980.36(d)(2)(D-G)) Integrated	(4980.78(b)(4)(A)) 15 Hours/1 Semester Unit Can be completed while registered.	(4980.78(b)(4)(A)) 15 Hours/1 Semester Unit Can be completed while registered.
ALCOHOLISM AND CHEMICAL SUBSTANCE ABUSE AND DEPENDENCY	ADDITIONAL COURSEWORK (16 CCR 1807.3) 15 Hours	(BPC § 4980.36(d)(2)(I)) Integrated		
SUBSTANCE ABUSE DISORDERS			ADDITIONAL COURSEWORK (BPC § 4980.81(a)(7)) 15 Hours/1 Semester Unit	ADDITIONAL COURSEWORK (BPC § 4980.81(a)(7)) 15 Hours/1 Semester Unit
CO-OCCURRING DISORDERS AND ADDICTION			ADDITIONAL COURSEWORK (15 Hours)	ADDITIONAL COURSEWORK (15 Hours)
PSYCHOLOGICAL TESTING	ADDITIONAL COURSEWORK (BPC § 4980.41(a)(6)) 2 Semester/3 Quarter Units	(BPC § 4980.36(d)(2)(A)) Integrated	ADDITIONAL COURSEWORK (BPC § 4980.81(a)(2)) 15 Hours/1 Semester Unit	ADDITIONAL COURSEWORK (BPC § 4980.81(a)(2)) 15 Hours/1 Semester Unit
PSYCHOPHARMACOLOGY	ADDITIONAL COURSEWORK	(BPC § 4980.36(d)(2)(A)) Integrated	ADDITIONAL COURSEWORK	ADDITIONAL COURSEWORK

	(BPC § 4980.41(a)(7)) 2 Semester/3 Quarter Units		(BPC § 4980.81((a)(2)) 15 Hours/1 Semester Unit	(BPC § 4980.81((a)(2)) 15 Hours/1 Semester Unit
SPOUSAL/PARTNER ABUSE ASSESSMENT, DETECTION, AND INTERVENTION	ADDITIONAL COURSEWORK (BPC § 4980.41(a)(5)) No specific number of hours if began graduate study between 1/1/95 and 12/31/03, but course must cover assessment, detection, and intervention. 15 Hours if began graduate study on or after 1/1/94.	(BPC § 4980.36(d)(2)(C)(ii)) Integrated	ADDITIONAL COURSEWORK (4980.81(a)(4)(A)(iii)) 15 Hours	ADDITIONAL COURSEWORK (4980.81(a)(4)(A)(iii)) 15 Hours
CHILD ABUSE AND ASSESSMENT	ADDITIONAL COURSEWORK (BPC § 28) Minimum of 7 Contact Hours	(BPC § 28) Minimum of 7 Contact Hours	ADDITIONAL COURSEWORK (BPC § 28) Minimum 7 Contact Hours	ADDITIONAL COURSEWORK (BPC § 28) Minimum 7 Contact Hours
HUMAN SEXUALITY	ADDITIONAL COURSEWORK (16 CCR 1807) 10 Hours	(BPC § 4980.36(d)(2)(H)) Integrated	ADDITIONAL COURSEWORK (BPC § 4980.81((a)(6)) 15 Hours/1 Semester Unit	ADDITIONAL COURSEWORK (BPC § 4980.81((a)(6)) 15 Hours/1 Semester Unit
CALIFORNIA LAW AND PROFESSIONAL ETHICS	ADDITIONAL COURSEWORK (BPC § 4980.41(1)) 2 Semester/3 Quarter Units	(BPC § 4980.36(d)(2)(J)) Integrated	(4980.78(2)) If Completed 2 Semester/ 3 Quarter Units of Law and Ethics, but no CA Content then 12 Hour Course Prior to Registration. If No Law and Ethics Course, then 2 Semester/3 Quarter Unit Course Prior to Registration	(4980.78(2)) If Completed 2 Semester/ 3 Quarter Units of Law and Ethics, but no CA Content then 12 Hour Course Prior to Registration. If No Law and Ethics Course, then 2 Semester/3 Quarter Unit Course Prior to Registration

AGING, LONG-TERM CARE AND ELDER/DEPENDENT ADULT ABUSE	ADDITIONAL COURSEWORK (BPC § 4980.39) 10 Hours	(BPC § 4980.36(d)(2)(B)) Integrated	ADDITIONAL COURSEWORK (80.81(a)(4)(A)(ii)) 10 Hours	ADDITIONAL COURSEWORK (80.81(a)(4)(A)(ii)) 10 Hours
DEVELOPMENTAL ISSUES FROM OLD AGE TO INFANCY			ADDITIONAL COURSEWORK (BPC § 4980.81(a)(3)(A)) 15 Hours/1 Semester Unit (If deficient in one topic, may remediate by taking 3 hour instruction in each missing topic.	ADDITIONAL COURSEWORK (BPC § 4980.81(a)(3)(A)) 15 Hours/1 Semester Unit (If deficient in one topic, may remediate by taking 3 hour instruction in each missing topic.
MISCELLANEOUS*	Integrated	(BPC § 4980.36(d)(2)(C)) Integrated	ADDITIONAL COURSEWORK (No Specific Hours)	ADDITIONAL COURSEWORK (No Specific Hours)
TELEHEALTH	(BPC § 4980.395) 3 Hours of Training	(BPC § 4980.395) 3 Hours of Training	(BPC § 4980.395) 3 Hours of Training	(BPC § 4980.395) 3 Hours of Training
SUICIDE RISK AND ASSESSMENT	(BPC § 4980.396(a)) 6 Hours of Coursework or Applied Experience	(BPC § 4980.396(a)) 6 Hours of Coursework or Applied Experience	(BPC § 4980.396(a)) 6 Hours of Coursework or Applied Experience	(BPC § 4980.396(a)) 6 Hours of Coursework or Applied Experience

*Instruction must include:

- Childbirth, child rearing, parenting and step-parenting
- Marriage, divorce and blended family
- Cultural factors relevant to abuse or partners and family members
- Poverty and deprivation
- Financial and social stress
- Effect of trauma
- The psychological, psychotherapeutic, community and health implications of the matters and life events that arise in marriage and family relationships within a variety of California cultures.