



Board of Behavioral Sciences

Memo

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To: Board Members

Date: August 13, 2025

From: Steve Sodergren
Executive Officer

Subject: **Discussion and Possible Action to Initiate a Rulemaking to Accept the Association of Marital and Family Therapy Regulatory Boards' Marital and Family Therapy National Examination as the Clinical Exam for California Licensure as a Marriage and Family Therapist**

Currently, California is the only state that does not accept the Association of Marital and Family Therapist Regulatory Board's (AMFTRB) Marital and Family National Examination (AMFTRB National Exam) for LMFT licensure, instead requiring passage of a state-developed clinical exam. Adopting the AMFTRB National Exam aligns with Goal 2.3 of the Board's 2022-2026 Strategic Plan and builds upon similar steps taken by the Board for the LCSW and LPCC professions. Adopting the AMFTRB National Exam would increase license portability for California MFTs, reduce administrative barriers for licensees and alleviate administrative demands on the Board, while preserving strong consumer protections.

Background

In September 2024, the Board approved proposed amendments that would authorize it to adopt a national examination via regulations. This statutory amendment is now pending in the Legislature and, if successful, would become effective January 1, 2026. Subsequently, at its February 2025 meeting, the Board directed staff to draft the initial rulemaking documents to designate the AMFTRB National Exam as the national examination and, once the identified acceptance criteria are met, bring the proposal back for the Board's final consideration and authorization to submit the rulemaking package.

Since the initial discussion of adopting the AMFTRB National Exam in November 2022, staff have been working with AMFTRB to address concerns related to content, scope, and accessibility. The identified acceptance criteria and current status of each are as follows:

- 1. Collaborate with AMFTRB on addressing examination content and measurement scope concerns. (Content & Scope)**

The Office of Professional Examination Services (OPES) reviewed the AMFTRB National Exam and presented its findings in a closed session at the November 2022 Board meeting. OPES determined that the AFTRB National Exam measures broad practice competencies, while California's LMFT Clinical Exam focuses on competencies specific to the practice within the state.

AMFTRB is currently completing a Jobs Task Analysis (JTA) with substantial input from California LMFTs, which will help align exam content with current California practice. AMFTRB also notes that national trends are increasingly aligning with California's practices, and they expect this to influence changes in both content and measurement scope of the LMFT National Exam. In addition, AMFTRB plans to incorporate questions from the Board's existing LMFT Clinical Exam item bank, maintained by OPES, to further ensure content alignment.

2. Collaborate with AMFRTB on addressing accessibility for testing candidates to ensure exam candidates are not adversely affected by the transition to the AMFTRB National Exam. (Accessibility)

Currently, the AMFTRB National Exam is offered one week per month at Prometric testing centers. AMFTRB is actively exploring options to expand exam availability, including both frequency and capacity, to meet California's candidate volume. Staff have confirmed that discussions are underway between AMFTRB and Prometric regarding the feasibility of offering the exam more frequently, and potentially on a continuous basis.

However, advancing implementation will require a contractual commitment and can only fully proceed once the Board formally approves the regulatory language designating the AMFTRB National Exam as required LMFT clinical examination.

3. Work with DCA's Office of Information Services (OIS) to ensure an automated system is in place for transferring national examination eligibilities and test scores. (System Changes)

Initiating system changes will require the Board to adopt the AMFTRB National Exam by approving the necessary regulatory language. Historically, system changes of this scope have required substantial time to plan, develop, and fully implement.

4. Pursue the statute and regulatory amendments necessary to accept the AMFTRB National Exam for licensure.

The statutory amendments were approved by the Board at the September 2024 meeting and are currently included in the Board's sunset bill, SB 775 (Ashby).

Implementation Timeline

Staff anticipate that full implementation of the AMFTRB exam will take 12 to 18 months after the Board approves the regulatory language. While key transition steps have been identified, substantive work cannot begin until the Board confirms its intent to adopt the AMFTRB National Exam. Key implementation activities include completing the required rulemaking process, ensuring system readiness for the transfer of examination eligibilities and scores, and collaborating with stakeholders to establish clear administrative processes that will support a smooth and efficient transition. Once the language is approved, staff will coordinate with AFMTRB on implementation, report the progress regularly to the Board, and continue working on final adoption of the regulatory amendments. This proposal would permit use of the Board-administered examination through December 31, 2026, which would allow the Board and affected stakeholders sufficient time to transition to the AMFTRB exam effective January 1, 2027.

Recommendation

Staff recommends that the Board adopt the proposed regulatory amendments that would formally designate the AMFTRB National Exam as the LMFT clinical exam required for LMFT licensure in California effective on or after January 1, 2027.
(Attachment A)

Motion A: (To be used if the Board has **NO suggested changes** for the proposed regulatory text in **Attachment A**):

Approve the proposed regulatory text as presented in **Attachment A** and submit the approved text to the Director of the Department of Consumer Affairs and the Business, Consumer Services, and Housing Agency for review, and if no adverse comments are received, authorize the Executive Officer to take all steps necessary to initiate the rulemaking process, make any non-substantive changes to the text and the package, and set the matter for a hearing if requested. If after the 45-day public comment period, no adverse comments are received and no public hearing is requested, authorize the Executive Officer to take all steps necessary to complete the rulemaking, and adopt the proposed regulations as noticed for Title 16, California Code of Regulations sections 1816.2 and 1829.1.

Motion B: (To be used if the Board DOES have **suggested changes** for the proposed regulatory text in **Attachment A**):

Approve the proposed regulatory text as presented in Attachment A with the following changes: (specify the proposed changes to the proposed text). In addition, submit the approved text as revised at this meeting to the Director of the Department of Consumer Affairs and the Business, Consumer Services, and Housing Agency for review, and if no adverse comments are received, authorize the Executive Officer to take all steps necessary to initiate the rulemaking process, make any non-substantive changes to the text and the package, and set the matter for a hearing if requested. If after the 45-day public comment period, no adverse comments are received and no public hearing is requested, authorize the Executive Officer to take all steps necessary to complete the

rulemaking, and adopt the proposed regulations as noticed for Title 16, California Code of Regulations sections 1816.2 and 1829.1.

Attachments

Attachment A: Proposed Regulatory Language for Title 16, Division 18, California Code of Regulations Sections 1816.2 and 1829.1 (LMFT National Clinical Exam)

ATTACHMENT A
TITLE 16. BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS

PROPOSED REGULATORY LANGUAGE
Title 16, Division 18, California Code of Regulations
Sections 1816.2 and 1829.1.

Proposed amendments to the regulatory language are shown in <u>single underline</u> for text to be added and single strikethrough for text to be deleted.
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AMEND SECTIONS 1816.2 and 1829.1 IN TITLE 16 OF DIVISION 18 OF THE CALIFORNIA CODE OF REGULATIONS TO READ AS FOLLOWS:

§ 1816.2. Examination Fees.

(a) The licensed clinical social worker California law and ethics examination fee shall be one hundred fifty dollars (\$150).

(b) The licensed marriage and family therapist California law and ethics examination fee shall be one hundred fifty dollars (\$150).

~~(c) The board administered licensed marriage and family therapist clinical examination fee shall be two hundred fifty dollars (\$250).~~

~~(d)~~(c) The licensed educational psychologist written examination fee shall be two hundred fifty dollars (\$250).

~~(e)~~(d) The licensed professional clinical counselor California law and ethics examination shall be one hundred fifty dollars (\$150).

Note: Authority cited: Sections 4980.60 and 4990.20(a), Business and Professions Code. Reference: Sections 4984.7, 4989.68, 4996.3 and 4999.120, Business and Professions Code.

§ 1829.1. Required Examinations.

(a) The written examinations shall test for minimum acceptable competency to practice marriage and family therapy without causing harm to the public health, safety or welfare, and shall consist of the following:

(1) A California law and ethics examination designed to assess the applicant's knowledge of and ability to apply legal and ethical standards relating to the practice of marriage and family therapy.

(2) A clinical examination designed to assess an applicant's knowledge of psychotherapeutic principles and methods in treatment and their application, and the ability to make judgments about appropriate techniques, methods and objectives as applicable to the marriage and family therapist scope of practice.

(b) Until December 31, 2026, ~~T~~the clinical examination as described in subsection (a)(2) shall be a board administered examination.

(c) Effective on or after January 1, 2027, the clinical examination described in subsection (a)(2) shall be the Association of Marital and Family Therapy Regulatory Board's (AMFTRB) Marital and Family Therapy National Examination.

Note: Authority cited: Sections [4980.397](#), 4980.40 and 4980.60, Business and Professions Code.
Reference: Sections 4980.397, [4980.40](#), 4980.398, 4980.399 and 4980.50, Business and Professions Code.