



**CONNECT
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ACHIEVE**

California Association of Marriage and Family Therapists
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March 27, 2026

VIA EMAIL to BBS.Rulemaking@dca.ca.gov

Attn: Christy Berger
Board of Behavioral Sciences
1625 North Market Blvd., Suite S-200
Sacramento, CA 95834

RE: Modifications to Continuing Education; Exams; Renewals: Title 16, Division 18, California Code of Regulations Sections 1822.51, 1829.2, 1877.2, 1887, 1887.1, 1887.2, 1887.3, 1887.4.2, 1887.4.3, and 1887.12.

Dear Ms. Berger:

On behalf of our more than 39,000 members, the California Association of Marriage and Family Therapists (CAMFT) would like to comment on the modifications to the Continuing Education (CE); Exams; Renewals regulations as noticed on March 6, 2026.

We greatly appreciate the modifications made to the proposed regulations, including defining “limited one or more major life activities,” clarifying that “California Law and Ethics” encompasses all laws applicable to California practitioners, including federal laws, limiting CE credit for attendance at BBS meetings to Board meetings only, and reducing the number of CE credits that may be earned through supervision to six.

We also appreciate the added language clarifying that CE hours earned by attending BBS Board meetings shall not be used to satisfy the law and ethics portion of CE requirements for licensees or registrants, nor any supervision training or coursework requirements for supervisors. We offer one additional comment to the modified text for consideration in the Final Rulemaking, specifically regarding the added language clarifying that CE hours earned via supervision shall not be used to satisfy supervision training or coursework requirements for supervisors.

As drafted, the modified text does not address whether CE credit earned through supervision may overlap with the existing six-hour law and ethics requirement. We respectfully request clarification as to whether the Board intends to allow the six hours of CE credit earned through supervision to count toward the law and ethics requirement. For example, if a supervisor provides supervision that substantively addresses a pre-licensee’s legal obligations, such as mandated reporting of child abuse, could those hours qualify toward satisfying the law and ethics CE requirement?

If this is not the Board's intent, we recommend that the language be further clarified to explicitly state that CE hours earned via supervision may not be used to satisfy the law and ethics requirement. We are concerned that, absent clarification similar to the language adopted for CE hours earned through attendance at BBS Board meetings, supervisors could reasonably interpret the regulation to allow those six CE hours earned through supervision to count towards the law and ethics requirement.

Thank you for considering our comments.

Sincerely,

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Shanti Ezrine, MPA
State Government Affairs Associate

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Cathy Atkins, JD
Deputy Executive Director