



**MEMORANDUM**

<b>DATE</b>	June 1, 2026
<b>TO</b>	Workforce Development Committee
<b>FROM</b>	Rosanne Helms, Legislative Manager
<b>SUBJECT</b>	<b>Discussion and Possible Recommendations Regarding Education Requirements for Licensed Marriage and Family Therapists: Defining an Integrated Degree Program and Allowing Transfer Units</b>

**Background**

Current law (Business and Professions Code §§4980.36(c), 4980.37(b)) requires a qualifying master’s or doctoral degree to be a single, integrated degree program. This means that certain core coursework, such as practicum and number of units of instruction, must be contained within the qualifying degree. In contrast, other additional coursework that is not considered core coursework, such as suicide risk assessment or training on provision of services via telehealth, can be transferred from another degree program or taken as continuing education after completion of the degree.

The single, integrated degree requirement is intended to ensure that the qualifying degree is part of a cohesive program specifically designed to lead to licensure as a Marriage and Family Therapist (MFT), rather than pieced together from multiple programs or degrees that are not focused on MFT education or are not intended to prepare students for LMFT licensure.

The requirement that the qualifying degree be a single, integrated program is not new. However, as programs evolve, questions have been raised regarding what constitutes a “single, integrated program” and what, if any, exceptions may apply. For example, at times questions arise about how to treat units earned at a school that later closes, graduate coursework completed before the student formally enters their MFT program, or coursework taken as part of a combined master’s and doctoral pathway. In an effort to clarify these issues and provide limited flexibility and consistent application of the law, while maintaining the law’s intent that a qualifying degree is not assembled from multiple unrelated programs, staff proposes a new section defining an integrated degree and establishing narrow exceptions (**Attachment A**).

**Need for Clarification**

Transcript reviews and program structures demonstrate variation in how institutions interpret the requirement for a single, integrated degree. Without a statutory definition, schools and applicants apply inconsistent standards, resulting in confusion, delayed applications, and situations where otherwise strong candidates may be denied because their transcripts do not clearly reflect a single integrated program.

Staff have identified several recurring situations that highlight the need for clearer statutory guidance:

**1. School Closures**

In situations where an institution permanently closes, students may need to transfer coursework into a new program. Without clear rules, it can be difficult to determine how much coursework may be accepted and how it should be reflected on the transcript.

**2. Formally Structured Combined Master’s/Doctoral Programs**

Some institutions offer intentionally designed combined programs where coursework spans both the master’s and doctoral levels. Without clarification, it is unclear whether these programs meet the definition of a single, integrated degree program.

**3. Master’s-Level Transfer Credit From Another Graduate Program**

At times, an applicant may begin an MFT program at one graduate school, and for various reasons may decide to transfer to a different graduate school. Or they may complete one master’s degree that contains some MFT-related content and then begin an MFT degree program and wish to transfer some of that content into their MFT degree. In this situation, it would be helpful to have clarity regarding how many units may be transferred without undermining the requirement that the qualifying degree be a single, integrated program, and how that coursework should be reflected on a transcript.

**4. Graduate-Level Coursework Completed During Undergraduate Studies**

Some applicants complete graduate-level courses while still undergraduates, and schools later count these units toward the qualifying degree. When those units were not originally taken as part of the qualifying graduate program, it becomes difficult to determine whether the coursework fits within an integrated degree structure.

These examples highlight the need for clearer guidance so that programs understand how to structure and document their degrees, and applicants have predictable, fair outcomes.

**Previous Committee Discussion**

The Committee discussed the proposed language at its April 17, 2026 meeting. It directed staff to make clarifications to the language, including better clarifying references to the degree-granting institution.

Staff has updated the proposed language to incorporate this feedback, as well as additional feedback from the Board’s Registration Unit.

### **Recommendation**

Conduct an open discussion on the language proposed in **Attachment A**. Direct staff to make any discussed changes, and any nonsubstantive changes, and to incorporate the language into the proposed MFT education amendments that the Committee is working on.

### **Attachment**

**Attachment A:** Additional Section – Definition of Integrated Degree Program and Allowance of Transfer Units

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**Attachment A**  
**Additional Section – Definition of Integrated Degree Program and Allowance of Transfer Units**

***Last Updated 5/21/2026***

**4980.xx Degree Integration and Transfer Units**

For the purposes of section 4980.36, a “single, integrated degree” means a graduate program that is designed, delivered, and awarded by one institution as a cohesive course of study. The program shall be structured to meet the educational requirements for licensure as a marriage and family therapist, rather than assembled from unrelated or separately awarded degrees or coursework. The completed qualifying graduate degree shall be reflected on a single transcript which shall total no fewer than 60 semester units or 90 quarter units of graduate-level coursework. Coursework may only be transferred from another program under the following limited exceptions:

(a) (1) **School Closure Exception.** Applicants who were enrolled in a qualifying graduate degree program at an institution that is permanently closed may transfer graduate-level coursework to a new educational institution, provided that:

- A. The degree-granting institution accepts the transferred coursework as equivalent and integrates it into the qualifying graduate degree program.
- B. The official transcript from the degree-granting institution shall include each transferred course, listed by course number and title, as part of the qualifying graduate degree. The transcript shall also show that the transferred units are totaled into, and not counted separately from, the minimum required 60 semester units or 90 quarter units.

There is no limit on the number of transfer units for this exception, however, the required practicum coursework shall not be transferred and must be completed as part of the qualifying graduate degree program from the degree-granting institution.

(2) **Combined Master’s/Doctoral Program Exception.** In the case of formally structured combined master’s and doctoral programs offered by the same institution, the 60 semester-unit or 90 quarter unit requirement may be met across both degrees, provided that the coursework is part of a continuous, planned program of study in marriage and family therapy or a related mental health field and the applicant provides documentation from the degree-granting institution verifying the integrated nature of the program.

(3) **Master’s-Level Transfer Credit Exception.** For applicants not qualifying for an exception under paragraphs (1) or (2), no more than 12 semester units or 18 quarter

units of graduate-level coursework may be transferred from another graduate degree program, provided that:

- A. The degree-granting institution accepts the transferred coursework as equivalent and integrates it into the qualifying graduate degree program.
- B. The official transcript from the degree-granting institution shall include each transferred course, listed by course number and title, as part of the qualifying graduate degree. The transcript shall also show that the transferred units are totaled into, and not counted separately from, the minimum required 60 semester units or 90 quarter units.
- C. Practicum coursework shall not be transferred and must be completed as part of the qualifying graduate degree program from the degree-granting institution.

**(4) Undergraduate-Level Transfer Credit Exception.** The Board shall not accept undergraduate courses as meeting any coursework requirement unless the applicant's official transcript clearly shows that the course was awarded graduate credit by the degree-granting institution. The following applies to graduate-level coursework taken as an undergraduate:

- A. If the coursework was taken from the degree-granting institution, the board may accept up to 12 semester units or 18 quarter units.
- B. If the coursework was not taken from the degree-granting institution, the board may accept up to 6 semester units or 9 quarter units.
- C. The official transcript from the degree-granting institution shall include each transferred course, listed by course number and title, as part of the qualifying graduate degree. The transcript shall also show that the transferred units are totaled into, and not counted separately from, the minimum required 60 semester units or 90 quarter units.
- D. Practicum coursework shall not be transferred and must be completed as part of the qualifying graduate degree program from the degree-granting institution.

(b) For all of the exceptions described in subdivision (a), the degree-granting institution shall certify that the content of the transferred coursework is in marriage and family therapy or in related areas directly supporting the development of the applicant's professional marriage and family, individual, or group therapy skills and that the qualifying graduate degree program meets all educational requirements for licensure as a marriage and family therapist as outlined in this chapter. The board may require the

degree-granting institution to submit a letter of explanation verifying and explaining the circumstances surrounding any transferred coursework.

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