

**TITLE 16. PROFESSIONAL AND VOCATIONAL REGULATIONS**  
**Division 18**

**DEPARTMENT OF CONSUMER AFFAIRS**

**Board of Behavioral Sciences**

**Final Statement of Reasons**

**Subject Matter of Proposed Regulations:** Fee Reductions

**Sections Affected:** Sections 1816, 1816.1, 1816.2 and 1816.4 of Division 18 of Title 16 of the California Code of Regulations (16 CCR)

**Updated Information**

The Informative Digest and Initial Statement of Reasons are included in the rulemaking file and incorporated as though set forth herein. The information contained therein is updated as follows.

The 45-day public comment period began on September 19, 2025 and ended on November 3, 2025. The Board of Behavioral Sciences (Board) received a request for hearing and written comments as described below. The comments received as well as the responses to those comments are summarized in the “Objections or Recommendations/Responses” section below.

The Board received two requests for a public hearing during the original public comment period, and a separate public hearing was noticed on and held on November 6, 2025 at 9:00AM; the public comment period was also extended to November 6, 2025 at 12:00PM. The Board received one oral comment at the hearing. The Board considered all comments received at its November 21, 2025 meeting and took action as described in the “Objections or Recommendations/Responses” section below. The Board also adopted the text as originally noticed and delegated to the Executive Officer the authority to make any non-substantive changes that may be required in completing the rulemaking file.

After submission to the Office of Administrative Law on December 22, 2025, the Board made the following non-substantive changes to the regulatory language:

1. Capitalizing the word “Note” at the bottom of CCR sections 1816.2 and 1816.4
2. Hyphenating “board-administered” in CCR section 1816.2 (c) and (h)
3. Adding a space after “128.5” in the NOTE for CCR sections 1816.2 and 1816.4.

In addition, the Board adds the following information:

The Behavioral Science Fund ended fiscal year 2024-25 with 27.7 months in reserve.

### **Local Mandate**

A mandate is not imposed on local agencies or school districts.

### **Consideration of Alternatives**

No reasonable alternative which was considered or that has otherwise been identified and brought to the attention of the Board as part of public comments received or at the Board's meetings would be more effective in carrying out the purpose for which the regulations are proposed or would be as effective and less burdensome to affected private persons than the adopted regulations or would be more cost effective to affected private persons and equally effective in implementing the statutory policy or other provision of law. All recommendations provided during this rulemaking were considered by the Board and acknowledged or rejected as discussed below.

### **OBJECTIONS OR RECOMMENDATIONS/RESPONSES**

The 45-day comment period began on September 19, 2025 and was extended to end on November 6, 2025 at 12:00 PM. The Board also held a hearing November 6, 2025 at 9:00 AM.

The Board summary of and responses to the comments received are presented below.

#### **Comment 1: Victoria Leftridge, LPCC, LPC, September 19, 2025**

Commenter wrote in support of the proposal and stated that they "think reducing fees across the board will increase access opportunities for more marginalized groups to get licensed" and "in turn increase representation of counselors and will enable clients to be able to have a variety of providers to choose from including ones that may share multiple facets of their identities."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

#### **Comment 2: Cecilia Renee Emery, MSSW, LCSW, September 19, 2025**

Commenter wrote in support of the proposal and stated that the fees in California are twice as much as in the other states where they are licensed. Commenter also added, "The fees and processes in California present an unreasonable obstacle for helping professionals who seek to fill the gaps in underserved areas of care for residents." Commenter also commented that the lack of reciprocity in California is "also outrageous," but acknowledged that this is "not what these regulations are about."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment. The other comments are not addressed as they were not directed to this current rulemaking proposal or to the processes or procedures the Board used in adopting this proposed regulation.

**Comment 3: Reyna Moreno, LMFT, September 19, 2025**

Commenter stated, "I would like to request a public hearing for the fee reduction proposed regulatory change. I feel like this is [s/c]

I am writing to formally request a public hearing regarding the proposed fee reduction outlined in BBS Pending Regulations website. Given the potential impact of this proposal on therapists, I believe it is essential to provide an open forum for community members to share their perspectives, ask questions, and engage in a transparent dialogue.

A public hearing would help ensure that all voices are heard and considered before any final decisions are made."

Board Response: The Board acknowledges this comment, and a public hearing was scheduled for November 6th at 9:00 a.m. at the request of this commenter. A transcript of the hearing is attached to this memo. No further comments were received from this commenter, and no further changes were made to the text based upon the comment.

**Comment 4: Keonna Robinson, MA, LMFT, September 19, 2025**

Commenter wrote in support of the proposal and stated:

"This decision demonstrates a keen awareness of the current financial strain on registrants and licensees and highlights the Board's attentiveness to public comments from those actively working on the frontlines of this tough yet meaningful profession we are privileged to embark upon. I believe this is an equitable solution that aligns with the Board's stated values and mission to address the growing practitioner shortage in our state."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 5: Laurel Tanner McKay Ed.S, September 19, 2025**

Commenter stated that they are "very happy about the possibility of the fees being reduced for the processes leading to the licensing for California LMFT's and LEP's" and they "believe that the fees are currently a barrier for many potential professionals who would otherwise pursue these licensures." Commenter conveyed their personal

struggles with paying the required fees for licensure and examination, indicating that “I, myself, have completed the application for LEP twice and did not submit it because of lack of funds at the time.” Commenter expressed their belief that we need more mental health professionals in today’s world and that LEPs are seasoned school psychologists who have on-the-ground, real-life experience to provide relevant educational counseling and behavioral services to youth and their families outside of the school setting.

Commenter stated that reduced fees will make getting a license more economically accessible to more professionals, and having more LMFTs and LEPs “will, in turn, help more children, families, and support the schools in managing the profound social-emotional and behavioral needs of children.”

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 6: Vicky Kwan, LCSW, September 19, 2025**

Commenter noted LCSW Initial Clinical Exam Fees are not included as part of the fee reduction proposal and questioned the rationale for the exclusion. Commenter provided a list of the fee reductions proposed for the following: annual renewal, biennial active renewal, registration application, initial license issuance, California Law & Ethics Exam, LMFT Clinical Exam & LEP Written Exam (this item is “highlighted” in the comment) and license application.

Board Response: For clarification: the LCSW clinical exam was not included as part of the Board’s proposed fee reductions because it is not a Board-administered exam, and the Board has no authority to set the fees for the examination. The LCSW clinical exam is administered by the Association of Social Work Boards (ASWB) (see 16 CCR section 1877.1); exam fees are set and paid directly to ASWB. The Board is not authorized to adjust fees for the organization. No changes were made to the text based on the comment.

**Comment 7: Stephen R. Goodman, LCSW, September 19, 2025**

Commenter stated they were in “100% favor of the fee reduction plan.”

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 8: Nicole Hanhan, LCSW, September 22, 2025**

Commenter stated that as licensed therapist and clinical supervisor in California, they strongly supported the proposed amendments. Commenter stated the “proposal provides important relief for both associates and licensed clinicians.” Commenter stated benefits of the reductions include equity, retention, sustainability, and quality of care. The commenter suggested that lower fees ensure the profession is accessible to those

from all backgrounds, clinicians are more likely to maintain active licenses when renewal fees are manageable, reduced costs help prevent burnout by allowing clinicians to allocate funds to support supervision, consultation and wellness supports that sustain their careers, and clients benefit when clinicians can redirect resources into advanced trainings, certification, and tools that directly improve mental health services. Commenter stated the reductions strengthen the entire behavioral health workforce at a time when California faces urgent mental health needs.

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 9: Lauren Lazo, September 22, 2025**

Commenter stated that as an associate clinician working toward licensure in California, they strongly supported the proposed amendments. Commenter stated associates face significant financial strain with low wages, student debt and high living costs and this temporary relief would “ease the burden while allowing us to invest in trainings that strengthen our skills”.

Commenter stated the “proposal provides important relief for both associates and licensed clinicians.” Commenter stated benefits of the reductions include equity, retention, sustainability, and quality of care. The commenter stated that lower fees ensure the profession is accessible to those from all backgrounds, clinicians are more likely to maintain active licenses when renewal fees are manageable, reduced costs reduce help prevent burnout as clinicians can allocate funds towards supervision, consultation and wellness supports that sustain careers, and clients benefit when clinicians can redirect resources into advanced trainings, certifications, and tolls that directly improve mental health services. Commenter stated the reductions strengthen the behavioral health workforce at a time when California faces urgent mental health needs.

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 10: Lexi Michaud, September 23, 2025**

Commenter stated they support the proposed action and believe it “will benefit the field by allowing more associates to obtain licensure status in a more timely and financially equipped manner, allowing for community mental health to be adequately addressed by qualified, licensed, professionals.”

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 11: Heather McFarland, ACSW, September 24, 2025**

Commenter stated they support the proposal as a current associate clinical social worker. Commenter also stated that while working at a community health clinic in Orange County, they have experienced the school loans, renewal fees, exam fees, and CEU courses that go along with the field are “financially taxing” and “add to the burnout and could deter individuals from advancing or even staying in the field.”

Commenter wrote that they hoped for a scheduled public hearing on this matter and hoped for the fee reduction window to begin sooner – on January 1, 2026.

Commenter also provided a link to the Notice of Proposed Action on the Board’s website.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. A public hearing was scheduled for November 6th at 9:00 a.m. A transcript of the hearing is attached to this memo.

The Board rejects commenter’s suggestion to increase the window of the proposed fee reductions. The Board has proposed the start date of the fee reductions window at the beginning of the fiscal year based on calculations which determined the appropriate amount of time necessary to reduce the reserve fund to an appropriate level. Extending the fee reduction period would lower the reserve fund beyond the Board’s intention.

No further comments were received from this commenter and no further changes were made to the text based upon the comment.

**Comment 12: Brenna Turnbow, ASW, September 24, 2025**

Commenter stated that as an associate clinical social worker in California, they strongly supported the proposed amendments.

Commenter stated the “proposal provides important relief for both associates and licensed clinicians.” Commenter stated benefits of the reductions include equity, retention, sustainability, and quality of care. The commenter stated that lower fees ensure the profession is accessible to those from all backgrounds, clinicians are more likely to maintain active licenses when renewal fees are manageable, reduced costs reduce help prevent burnout as clinicians can allocate funds towards supervision, consultation and wellness supports that sustain careers, and clients benefit when clinicians can redirect resources into advanced trainings, certifications, and tolls that directly improve mental health services. Commenter stated the reductions strengthen the behavioral health workforce at a time when California faces urgent mental health needs.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 13: Eva Hayek, September 24, 2025**

Commenter expressed their advocacy for reducing the Board's fees by 50%.

Commenter stated that given the money that is spent by students upon entering and completing a graduate program, in addition to the time, efforts, and dedication to a field that does not always reciprocate such luxuries, the commenter believes it will make a drastic difference to cut any applicable costs. This difference not only affects those entering the field, but the individuals, families, and communities they intend to heal moving forward.

Commenter stated, "In order to help others to the best of our ability, we must help ourselves first."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 14: Grace Schroeder, September 24, 2025**

Commenter expressed their strong support for the proposed amendments to reduce fees by 50%. Commenter stated that as a graduate student in clinical mental health counseling, "costs related to obtaining and maintaining licensure present a financial barrier to entering and sustaining a career in the field."

Commenter shared their personal experience navigating tuition, unpaid practicum experiences, and living expenses on limited to no income. Commenter stated students and professionals from marginalized backgrounds often have fewer family or community resources to draw on and the financial pressures can feel even heavier.

Commenter stated their belief that we need to make the field as accessible as possible so people with diverse folks with diverse backgrounds can serve communities in need of mental health support.

Commenter also stated reducing fees supports emerging counselors, and this proposal is not only a practical step towards reducing financial barriers but also a meaningful investment in the future of the profession. It also ensures "those of us who are deeply committed to serving diverse and underserved communities can continue on the path to licensure without being deterred by prohibitive costs."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 15: Kathryn Vos, September 24, 2025**

Commenter stated this proposal would allow them as a trainee and soon to be



associate marriage and family therapist to spend less on fees and more into training and interventions to benefit their clients.

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 16: Deborah Hotchkiss, September 26, 2025**

Commenter introduced themselves as a current counseling master's student at Cal State Fullerton and stated their support for the proposed amendments. Commenter stated the fee reductions would be an amazing gift to those of us struggling with expenses "as we are trying to get started in the field." Commenter stated a fee reduction "would also be proof that our profession truly values individual health and collective social justice."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 17: Brandon Mears, September 26, 2025**

Commenter stated their strong support for the proposed amendments. Commenter stated this proposal is "both legally required under BPC §128.5 and fiscally responsible, ensuring the Board's reserve fund remains compliant while still protecting its ability to carry out licensing and enforcement functions."

Commenter stated the reductions will also will "ease financial barriers for students, associates, and new licensees who are entering the field while often managing significant educational debt." Commenter continued that making licensure more affordable will strengthen California's behavioral health workforce at a time when access to care is critically needed, and the \$10.4 million reduction will directly benefit over 150,000 licensees and their employers without imposing new costs or burdens.

Commenter summarized that the proposal "is a balanced, time-limited measure that provides immediate benefits to licensees and the public while maintaining the Board's long-term fiscal stability."

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 18: Emily Berry, October 2, 2025**

Commenter stated their strong support for the proposed amendments. Commenter introduced themselves as an associate clinician working towards licensure in California and stated their strong support for the proposed amendments. Commenter stated associates face significant financial strain with low wages, student debt, and high living costs. This proposal would ease the burden on associates while allowing them to invest



in training to strengthen their skills. Commenter also stated the proposed amendments would support early career clinicians and build a stronger behavioral health workforce to meet California's mental health needs.

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 19: Amanda Sharp, October 9, 2025**

Commenter stated their support for the proposed amendments. Commenter stated this proposal would have a positive impact lowering the barriers towards licensure and maintaining licensure for individuals.

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 20: Shanti Ezrine, MPA, and Cathy Atkins, JD, Deputy Executive Director, California Association of Marriage and Family Therapists (CAMFT), October 9, 2025**

In a letter emailed to the Board received on October 9, 2025 regarding "Proposed Regulatory Language on Fee Reductions: Title 16, Division 18, California Code of Regulations (CCR) Sections 1816, 1816.1, 1816.2, and 1816.4", CAMFT provided three comments on the proposal. The summarized comments are as follows:

**SUMMARIZED CAMFT COMMENT #1**

**Clarifying Reductions to Subsequent Registration Fees:** Commenter stated the proposed amendments clearly outline reductions to application and annual renewal fees for associate registrants, but "it is unclear whether these reductions also apply to subsequent registration fees." CAMFT requests clarification on whether the proposed reductions extend to subsequent registration fees.

Board Response: The proposed language sets forth the specific criteria when the fee reductions will occur, which includes a 50% fee reduction for all application and registration and renewal fees for a four-year window starting on July 1, 2026 through June 30, 2030. Specifically, for each application fee and renewal fee required for registration listed in CCR sections 1816 and 1816.1, the Board has listed an "exception" to payment of the existing fee in the existing text by cross-referencing to new proposed subsections that would specify that, "For the period of July 1, 2026, through June 30, 2030," the specified fee would be set at an amount that is 50% of the existing fee. After those dates, fees would return to existing fee levels under this current proposal. The Board used this approach to adopt fee reductions in 2001 and 2002 without any issues (see amendment of subsections (a)-(c) and new subsections (h)-(j) filed 7-25-2000; operative 1-1-2001 (California Regulatory Notice Register 2000, No. 30).)

No changes were made to the text based upon the comment.

#### SUMMARIZED CAMFT COMMENT #2

##### **Managing the Impact of Proposed Fee Reductions on Processing Times:**

Commenter stated the Board faces challenges meeting its application processing goals for LMFTs and LCSWs. Under California Code of Regulations Section 1805.1, the Board's processing target goals are 30 business days for registration applications and 60 business days for licensure applications. However, the Board's Sunset Review 2025 reported that average processing times were 99 business days for LMFTs and 89 business days for LCSWs, far surpassing established standards.

CAMFT questions how the proposed fee reductions will impact processing demands under existing staffing levels. CAMFT understands that Business and Professions Code, Section 128.5(b) requires a reduction of fees once encumbered funds reach an amount equal or more than the agency's operating budget for two fiscal years, but even with these reductions, the Board will reach a maximum reserve fund balance. CAMFT is interested in the Board's thoughts on submitting a Budget Change Proposal (BCP) to obtain authority to utilize reserve funds for temporary or limited term staffing to help with processing times.

Board Response: The temporary fee decrease will have no impact on the Board's budget allocation for personal services nor position authority; therefore, this proposal is not expected to impact processing demands under existing staff levels.

The Board is actively engaged in reviewing staffing levels and workload volumes to ensure processing demands are adequately met and will explore all options available to continue working towards the Board's processing target goals.

No changes were made to the text based upon the comment.

#### SUMMARIZED CAMFT COMMENT #3

**Shortening Duration of Proposed Fee Reductions:** Commenter stated CAMFT "understands that the Department's Budget office recommended that the Board's fees be reduced by 50% for a period of 48 months, which would lower the reserve fund to 15.4 months by the end of Fiscal Year 2029-2030 and allow the Board to withstand economic uncertainties."

Commenter stated CAMFT is concerned about the four-year period of these fee reductions because BBS's reserve fund has been previously affected by state-level borrowing to support the General Fund. Additionally, earlier this calendar year, the Governor's Budget included two reductions to state operations and positions, and fiscal year 2025-26 included cuts and borrowing to address a \$12 billion shortfall. Commenter

stated further economic uncertainty is expected to continue under the current federal administration. CAMFT is concerned additional future borrowing from the BBS's reserves could undermine long-term financial stability.

Commenter also stated the Board "is also working on several major policy initiatives that could begin implementation as early as January 1, 2027" which include changes to licensure and examination structure, and possible transition from the Board administered LMFT clinical exam to the AMFTRB national exam. These initiatives "will require significant staff resources for evaluation, planning, and implementation to prevent unintended consequences and ensure a smooth transition."

Commenter stated these "major economic uncertainties and significant changes to the BBS's operations can put significant financial pressure on the Board's operating expenses."

Per the commenter, CAMFT requests the Board consider shortening the duration of the proposed fee reduction period to one year or two in the alternative rather than four. Commenter stated the shorter duration "would: a) allow the BBS to reevaluate its budget resulting from the temporary fee reductions after a one year assessment period; b) satisfy the statutory reserve requirement under Business and Professions Code Section 128.5 and make any necessary changes to its fee regulations in the next fiscal year; and c) offer the BBS sufficient flexibility to address processing time delays through potential staffing augmentations, withstand future economic uncertainties, and sustain adequate surplus revenue to maintain current operations and support forthcoming initiatives."

Board Response: The Board rejects this comment. Based on current estimations for the reserve fund (including repayment to the Board of the Board's 2023 \$10 million loan to the General Fund), implementing these fee reductions for only one or two years would still result in the Board's reserve fund being over the 24-month reserve limit and non-compliant with Business and Professions Code (BPC) section 128.5(b).

The Board does not expect potential state borrowing to significantly impact the Board's financial stability. Special fund loans to support the General Fund cannot interfere with the purpose of the special fund. If the Board is not in a financial position to allow for lending, funds will not be lent.

If major policy initiatives require additional appropriation and resources, the Board's reserve fund of 15 months or greater following these reductions should be sufficient to cover implementation.

The Board must take steps to comply with BPC section 128.5(b) and plans to follow the Budget Office's recommendation on the appropriate length for the temporary fee

reductions to reduce the reserve fund to a fiscally responsible level. Within the four years proposed for these reductions, the Board will have sufficient time to reexamine the prior and reduced fee structures to determine the need for further adjustments while safeguarding its resources for expansion and economic uncertainty. The Board may reevaluate the duration of the proposed fee reductions at any point after implementation. If necessary, the Board can consider shortening or extending the fee reduction period as data becomes available.

No changes were made to the text based upon the comment.

**Comment 21: Emily S. Marsh, October 10, 2025**

Commenter stated the reduction in fees is “incredibly encouraging.” Commenter stated their full support of an initiative that makes licensure more accessible to more people by reducing barriers such as the cost of the process. Commenter thanked the Board for being involved in positive change and hearing comments from participants.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 22: Hanye Li, AMFT, October 10, 2025**

Commenter stated their full support for the 50% temporary fee reduction. Commenter stated this proposal would “meaningfully reduce financial strain for trainees and licensees while keeping the Board fiscally sound.” The commenter thanked the Board for prioritizing accessibility and supporting those entering the behavioral health field.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 23: Debbi Odell, October 10, 2025**

Commenter stated they were in favor of the fee reductions. Commenter acknowledged many states have much lower fees. Commenter stated, “For many therapists the additional cost is a barrier to entry and a huge stressor, and can contribute to rising costs of accessing therapy services, driving therapists to stop taking sliding scale or pro bono clients, move out of nonprofit work, or move out of the area.” Commenter stated this is especially true for associates “who are limited in options and often underpaid because there are many businesses who are not entirely following the labor laws and taking advantage of unlicensed status.”

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment. The other comments are not addressed as they were not directed to this current rulemaking proposal or to the processes or procedures the Board used in adopting this proposed regulation.

**Comment 24: Olga Rebecca Moreno, October 13, 2025**

Commenter stated that as a financially struggling student, they welcome the fee reduction for licensing and exam fees. Commenter stated the proposal also provides some equity “in our ability to afford these items.”

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 25: Dusty Delhagen, October 13, 2025**

Commenter expressed they believe the fee reductions are a very good proposal especially with inflation right now and they would be grateful to take advantage of the discount. Commenter feels as though these prices are the difference between people being able to complete licensure and not due to the prices.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 26: Nathan Roman, October 13, 2025**

Commenter stated they were notified by Pepperdine of the potential for reduced fees in the near future. Commenter expressed their advocacy of the proposed amendments as a graduate student in the MFT program.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 27: Dianne Daza, October 14, 2025**

Commenter introduced themselves as a former student at Pepperdine in the MFT program. Commenter shared their personal experience as a single mother of two pursuing higher education to give their children a better life and set an example.

Commenter expressed, “I have a passion for the community and with the political climate and being a first generation latina a reduction in the fee application would be of great benefit to me and others who may be experiencing the same difficulties of being a graduate student, single mother and limited income.”

Commenter stressed the importance of lowering the fee, giving many students the opportunity to apply without financial barriers and promoting diversity and inclusivity for students who may not be able to apply as easily (like the Commenter).

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 28: Karly Grace Vaughn, M.S., LMFT, October 15, 2025**

Commenter, a licensed marriage and family therapist, applauded the proposed amendments. Commenter stated the amendments to reduce fees by 50% are “a meaningful step toward both protecting California clinicians and ensuring the sustainability of our field.” Commenter also stated, “Studies consistently show that excessive fees are a main reason for the low licensure completion rates among clinicians in under-served communities and early-career therapists. Many clinicians I have spoken with, including myself, have faced points in our careers, especially early on, where we had to forgo basic personal needs in order to save for licensing and exam fees. I believe it is essential to reduce this burden for the next generation of clinicians.”

Commenter stated the amendments will not only ease the financial burden for clinicians but also protect the future of mental health care in the state. Commenter expressed that we do not have a sufficient number of therapists to fill the need in the state, and this amendment would help qualified people enter the profession without as many financial hurdles. Commenter stated they believe the changes will allow clinicians to concentrate on providing quality care rather than personal financial barriers.

Commenter urged lawmakers and stakeholders to adopt these amendments.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 29: Rebecca Abraham, October 16, 2025**

Commenter wrote in support of the fee reductions. Commenter introduced themselves as a student in a Master's of Clinical Psychology program pursuing the LMFT designation. Commenter stated there is a great need for MFT services and many students similar to themselves are trying to achieve licensure as soon as quickly as possible to meet the need, but a barrier to many is the cost.

Commenter stated, “While the requirements of the degree, the exam, the additional study for the exam and hours of clinical client work under supervision are all reasonable to ensure high quality, ethical service for clients, the impact of fees and lost earnings adds up fast. This both discourages potential clinicians from achieving licensure, and encourages those that do make it through to charge higher fees to clients to recoup their expenses, limiting access.”

Commenter also stated that there is no reason to not lower the fees as this change will not adversely impact the Board’s ability to do its job effectively.

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

### **Comment 30: Adrian Arrivillaga, October 17, 2025**

Commenter, an AMFT, wrote in support of the proposed regulations. Commenter stated the proposed changes are a step towards making the field more accessible.

Commenter shared, “Throughout my time in graduate school and in the field I have often been discouraged by how expensive and inaccessible our profession can be.”

Board Response: The Board acknowledges the commenter’s support of the proposed regulation. No changes were made to the text based upon the comment.

### **Comment 31: Nadine Nelson Manning, October 19, 2025**

Commenter wrote in support of the proposed regulations.

Commenter also stated that “as an M.A. Clinical Psychology student who is soon to graduate, we work for free for a year. This also needs to change! Students are literally struggling to eat and pay rent while also taking on school debt that even our pay when fully licensed will barely be able to pay. The current intern and associate structure in California is exploitative and prohibits [sic] minorities and single adults from being able to do comfortably. Any financial assistance that reduces this hardship is necessary.”

Commenter additionally stated, “Additionally, I hope that we will see a legal requirement that internships are required to be paid at minimum hourly wage at the least.”

Commenter provided, in quotations, the following announcement with italics and bolding as shown:

The Board of Behavioral Sciences (BBS) has announced a **proposed temporary fee reduction** for applicants, associates, and licensees. If approved, these changes would reduce several fees by **50%** from **July 1, 2026, through June 30, 2030**, including application, renewal, and examination fees.

The following temporary fee reductions would be in effect for **four** years, from July 1, 2026, through June 30, 2030:

**Annual Renewal (AMFT, ASW, APCC):** Reduced from \$150 to \$75

**Biennial Active Renewal (LMFT, LCSW, LPCC, LEP):** Reduced from \$200 to \$100

**Registration Application (AMFT, ASW, APCC):** Reduced from \$150 to \$75

**Initial License Issuance (LMFT, LCSW, LPCC, LEP):** Reduced from \$200 to \$100

**California Law & Ethics Exam (LMFT, LCSW, LPCC):** Reduced from \$150 to \$75

**LMFT Clinical Exam and LEP Written Exam:** Reduced from \$250 to \$125

**License Application (LMFT, LCSW, LPCC, LEP):** Reduced from \$250 to \$125



Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment. The other comments are not addressed as they were not directed to this current rulemaking proposal or to the processes or procedures the Board used in adopting this proposed regulation.

**Comment 32: Priyanka Yadvendu, October 19, 2025**

Commenter wrote they would like to make their voice heard and contribute their public comments in support of the proposed regulations.

Board Response: The Board acknowledges the commenter's support of the proposed regulation. No changes were made to the text based upon the comment.

**Comment 33: Shanti Ezrine, Government Affairs Associate, CAMFT, Oral  
Comment Received at November 6, 2025 Hearing**

Commenter stated CAMFT represents the professional interest of 39,000 MFTs across the state. Commenter acknowledged the reason for the rulemaking was to comply with the reserve limitation set in the Business and Professions Code and CAMFT supports efforts to help MFTs save money.

Commenter also acknowledged the Board is facing a staffing shortage as both application volumes and processing times increase. Commenter stated CAMFT's appreciation of the Board's efforts to address these challenges within the current budget.

Commenter stated CAMFT is not asking the Board to avoid reducing fees but believes there is "an opportunity here to explore creative ways for the BBS to manage its reserve, while also addressing the staffing shortages and processing delays."

Commenter stated CAMFT is interested in the Board's thoughts on submitting a budget change proposal "to obtain authority to utilize reserve funds for temporary or limited term staffing to help with processing times" with executive and legislative branch support.

Commenter also relayed CAMFT's request for the Board to consider shortening the duration of the fee reduction period to satisfy the requirement under the Business and Professions code as well as offer flexibility for a BCP and to withstand economic uncertainty. Commenter stated that while a BCP would not guarantee a budget change, it may be a good opportunity for the board to get the staffing they need to process MFT applications.

Commenter stated CAMFT will support the Board in any way they can, and their previously submitted written comment provides more details.

Board Response: This oral comment provides a summary of the written comment previously provided by CAMFT on October 9, 2025. For the reasons noted previously in response to CAMFT's written comments, the Board rejects the comments regarding shortening the duration of the fee reduction period. The Board also incorporates all prior responses to similar statements submitted by CAMFT in responding to these oral comments. The Board's response to the original comments may be referenced above. No changes were made to the text based upon the comment.

As noted previously, on November 21, 2025, the public comments were presented to the Board. The Board discussed the written public comment(s) and agreed with all staff recommended responses. For this reason, the Board agreed to proceed without making any changes to the originally noticed text.