



Board of Behavioral Sciences

# Memo

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**To:** Committee Members

**Date:** March 28, 2024

**From:** Rosanne Helms  
Legislative Manager

**Subject:** Discussion of Permitting Early Eligibility to take the Clinical Examination

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## **Background**

Applicants for licensure with the Board of Behavioral Sciences (Board) as a marriage and family therapist (LMFT), clinical social worker (LCSW) or professional clinical counselor (LPCC) are required to take and pass two examinations: a California law and ethics examination and a clinical examination:

- The California law and ethics examination must be attempted within the first year of registration and must be taken each subsequent year of registration until passed.
- The clinical examination may only be taken upon completion of all education requirements, the 3,000 required hours of supervised experience, and passing the California law and ethics examination. A passing score on the clinical examination is valid for seven years.

Licensed Educational Psychologist (LEP) applicants are required to take and pass one examination, a Board-administered clinical examination, upon completion of all education and experience requirements.

Once an applicant has completed their required experience hours, they submit their licensure application to the Board. The Board evaluates the application, and if all education and experience requirements are met and the law and ethics exam was passed, the applicant is given eligibility to take the clinical exam. Once the clinical exam is passed, the applicant submits an application for initial license issuance.

As the Committee continues to examine how to reduce barriers to licensure while upholding public protection, it may wish to consider whether changing the timing of when applicants for licensure are permitted to take the clinical examination would provide any benefit in expediting the licensure process.

## **AB 282: Psychology Board**

The California Psychological Association (CPA) recently sponsored a bill that will change the timing of when applicants for licensure as a psychologist are eligible to take their two required licensing exams. Currently, applicants for psychologist licensure must take a national examination upon completion of their doctorate degree and 1,500 hours of required supervised experience. They then become eligible to take a required Board-administered exam once they pass the national exam and complete the total 3,000 hours of required supervised experience.

[AB 282](#) will become effective once regulations are approved to implement the provisions of the bill. It was run in response to concerns about application processing times at the Board of Psychology. Under the bill, applicants for licensure will be permitted to take the required examinations upon completion of all academic coursework required for their doctoral degree. The educational institution will provide certification to the board that the coursework has been completed. The bill also contains a clause that if the national exam entity imposes additional eligibility requirements for their exam, the board must implement a process to verify satisfaction of those requirements. This comes into play because as of January 2026 that board's national exam is splitting into two parts. Per the board's proposed regulations, the first part of the national exam may be taken upon completion of all required academic coursework, but taking the second part of the national exam will still require gaining 1,500 experience hours.

## **National Exam Entity Eligibility Requirements**

The entities administering national examinations required by the Board may also set requirements for eligibility to take their exams, which licensing boards have to abide by. The Board requires a national clinical examination for both LCSW and LPCC. All other Board-required exams are administered by the Board:

Association of Social Work Boards (ASWB): The Board requires the ASWB clinical exam for licensure as an LCSW. ASWB does not permit its clinical exam to be taken upon completion of the degree program. However, it will allow testing after 18 months.

Per the [ASWB Policy Manual](#) (v. 1.2022, Section II, pg.II-3): *2.1 Procedures 12. Clinical. This examination has been developed for use as a licensure requirement by Member Boards that issue to individuals who have an MSW and two years (or commensurate experience as defined by the jurisdiction) of experience in clinical settings, licenses for the practice of Clinical Social Work. The practice of Clinical Social Work requires the application of specialized clinical knowledge and advanced clinical skills. Member Boards may approve candidates for examination who are within six (6) months of completing supervised experience requirement.*

In response to this, other states may choose to allow the ASWB clinical exam at 18 months. For example Florida recently adopted regulations that state the following (Florida Administrative Code Chapter 64B4, §3.003(a):

*(a) The examination for Clinical Social Workers shall be the Clinical Level objective multiple choice examination developed by the Association of Social Work Boards (ASWB). Beginning January 1, 2023, applicants shall be deemed eligible to take the examination after completion of 18 months of documented experience in clinical settings, not including the applicant's practicum or other experience received in the applicant's graduate program.*

The Oregon Board of Licensed Clinical Social Workers has a similar allowance. Per their [website](#), a clinical social worker associate may take the exam early as follows:

*Early Clinical Exam Approval- CSWA to LCSW*

*A CSWA is automatically given approval to take the ASWB Clinical exam when their completed plan is approved, and all hour and time requirements have been met. Once the CSWA has documented 75 hours of supervision, and 18 months of licensure, **The Candidate must be on track to complete the LCSW requirements with in the six months following the request.** ASWB will allow the Oregon Board of Licensed Social Workers to issue approval for CSWA's to sit for the exam if he/she desires to. A year's time is given to take and pass the exam. If an early request is desired, complete the [ASWB exam request form](#).*

National Board for Certified Counselors (NBCC): The Board requires NBCC's NCMHCE exam for licensure as an LPCC. In some instances, graduates or master's students in certain degree programs who are seeking one of NBCC's certifications may take the NCMHCE exam. Therefore, in certain instances NBCC does permit the taking of this exam before the required postgraduate supervised experience is gained.

**Previous Committee Discussion**

The Committee discussed this issue at its January 19, 2024 meeting. It directed staff to engage in discussions with ASWB and NBCC to determine feasible options.

ASWB Discussion

ASWB indicated that their requirement for taking the exam at 18 months of experience is based on psychometric research, but was agreeable to the Board specifying the number of hours at which the exam could be taken, if justifications were made. They indicated that the Board could write a proposal letter to their Board of Directors for consideration.

NBCC Discussion

NBCC indicated that they already allow their NCMHCE exam to be taken at various times, so they would likely be open to the Board's recommendation.

## **Recommendation**

Conduct an open discussion regarding permitting applicants for licensure to take the required clinical examination after completing 1,500 hours of postgraduate supervised experience.