



Board of Behavioral Sciences

Memo

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To: Committee Members

Date: October 2, 2025

From: Rosanne Helms
Legislative Manager

Subject: Implementation Issues Related to SB 1024 (Chapter 160, Statutes of 2024) – Required Notice to Consumers

Background

SB 1024 (Chapter 160, Statutes of 2024), sponsored by the Board of Behavioral Sciences (Board) in 2024 and enacted in 2025, updated the procedures for licensees and registrants of the Board to provide their license or registration information to clients. This change was prompted by the increasing use of telehealth, which made the physical display of a license in a traditional office setting impractical or impossible in many cases.

Instead of requiring the display of a license at the primary place of practice in all instances, the law now only requires its display at the primary place of practice when services are rendered in person. To ensure clients have access to their therapist's license information, the bill also requires licensees and registrants to include their full name as filed with the Board, license or registration number, type, and expiration date into the written notice that must be given to clients prior to initiating psychotherapy services. This is intended ensure transparency while minimizing administrative burden on licensees.

Current Implementation Issues

Since the law's enactment, two concerns have emerged:

1. Safety Concerns for Those Working with Incarcerated Populations:

Licensees who work with incarcerated individuals have expressed concern that disclosing their full name and license number may pose a safety risk to themselves and their families. These individuals may be particularly vulnerable to harassment or retaliation, and the mandatory disclosure of identifying information could exacerbate these risks.

Staff has received direct feedback from numerous licensees working with incarcerated populations, who have expressed serious safety concerns about the

disclosure requirements. In response, staff committed to bringing these concerns back to the Committee for discussion and consideration.

2. Scope of the Disclosure Requirement:

There is confusion among licensees regarding when the notice must be provided. The law states that the notice must be provided prior to “initiating psychotherapy services.” Questions have arisen regarding whether the intent is to provide the notice only when actual psychotherapy is being conducted, or when any activities within the scope of practice of the licensee’s profession (e.g., assessments, consultations, or supervision) are provided.

Board of Psychology Requirements

The Board of Psychology, whose licensees may also work in similar circumstances, also has disclosure requirements. Psychologists must provide their name, license type, and highest degree either in writing at the initial office visit, or prominently displayed in an area visible to patients in the office ([BPC §680.5](#)). The law does include an exemption for certain facilities licensed under Health and Safety Code (HSC) [§§1250 and 1265](#). The exemption includes general acute care hospitals and psychiatric hospitals, correctional treatment centers, and nursing facilities.

Recommendation

Conduct an open discussion regarding the following, and provide direction on whether further legislative or regulatory clarification is needed:

- Should the Board consider exemptions or alternative disclosure methods for licensees working in high-risk environments, such as correctional settings? If so, then how would such settings be concisely defined? Additionally, how should the Board balance the safety and privacy of practitioners with the right of vulnerable populations to be informed about the identity and credentials of their provider?
- Should the law or accompanying guidance clarify whether the disclosure requirement applies only to psychotherapy or to all professional activities within the licensee’s scope of practice?

Links

- FAQ: [Display of License/Registration Requirements and Required Notice to Consumers](#)
- Relevant Law: BPC [§§4980.31](#), [4980.32](#), [4989.17](#), [4989.48](#), [4996.7](#), [4996.75](#), [4999.70](#), [4999.71](#)