



Board of Behavioral Sciences

Memo

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To: Board Members

Date: November 12, 2025

From: Steve Sodergren
Executive Officer

Subject: Association of Marital and Family Therapist Regulatory Board
National Examination Update

Background

At its August 2025 meeting, the Board approved proposed regulatory language authorizing the use of the Association of Marital and Family Therapy Regulatory Boards (AMFTRB) Marital and Family Therapy National Examination (AMFTRB National Exam) for LMFT licensure in California. This change will replace the state-developed LMFT Clinical Examination, as the national exam is currently used in most U.S. jurisdictions.

The transition represents a significant modernization of California's licensing process and will support greater portability and consistency for LMFTs nationwide. However, a change of this scope requires careful coordination, detailed planning, and clear communication with all stakeholders to ensure a seamless implementation by January 1, 2027.

Planning Overview

The planning process for the transition involves four major workstreams:

- **Rulemaking Process** – Amending California regulations to designate the AMFTRB National Exam as the qualifying clinical exam for LMFT licensure.
- **System Development and Readiness** – Updating and testing the BreZE licensing system and related interfaces to ensure proper data transfer, eligibility processing, and result reporting.
- **Outreach and Stakeholder Communication** – Informing applicants, licensees, educators, and professional associations about new exam requirements, timelines, and procedures.
- **Examination Transition** – Coordinating with AMFTRB, the Professional Testing Corporation (PTC)(AMFTRB's examination developer), Prometric (AMFTRB national examination administrator), the Department of Consumer Affairs (DCA),

and the Office of Professional Examination Services (OPES) to manage the transition from the California exam to the national exam.

Each workstream is interdependent and requires coordination among multiple partners, including the Board, AMFTRB, PTC, Prometric, OPES, DCA, and the Office of Information Services (OIS). The process is designed to ensure readiness, transparency, and stakeholder confidence in the transition.

Rulemaking

The Board must initiate the formal rulemaking process to amend its regulations and designate the AMFTRB National Exam as the qualifying LMFT clinical exam. This process includes:

- Drafting the proposed regulatory text, Notice of Proposed Regulatory Action, and Initial Statement of Reasons (ISOR)
- Conducting internal and DCA legal review
- Publishing the proposed regulations for a 45-day public comment period
- Presenting all comments to the Board for review and response
- Submitting the final rulemaking package to the Office of Administrative Law (OAL) for approval

Staff have already prepared the proposed regulatory language, which the Board approved in August 2025. The rulemaking package is now in the production phase. The target date for filing the final package with OAL is May 2026. The transition cannot occur until the regulatory amendments are finalized and approved.

System Development and Readiness

To implement the AMFTRB National Exam, several system modifications are required within the Board's licensing and examination infrastructure. Staff are collaborating with the Office of Information Services (OIS) to update the BreEZe system to:

- Transfer candidate eligibility data to AMFTRB's testing vendor (PTC/Prometric)
- Receive and track examination results electronically
- Support internal monitoring and reporting of examination outcomes

System development will include testing, validation, and a phased rollout to ensure full functionality and minimize disruption to applicants. Deployment of the updated system is planned for August 2026, ahead of the January 2027 transition.

Outreach and Stakeholder Communication

A comprehensive outreach strategy is essential to ensure that all applicants, registrants, licensees, educators, and professional associations are informed and prepared. The outreach plan includes:

- Hosting informational webinars for educators, candidates, and stakeholders
- Publishing FAQs, handouts, and website updates outlining new requirements
- Coordinating with graduate programs and professional organizations
- Maintaining regular communication to ensure clarity during the transition period

This approach ensures that all parties understand when and how the transition will occur and what steps will be required to comply with the new examination process.

Examination Transition

The final phase involves the operational transition from California's LMFT Clinical Exam to the AMFTRB National Exam. Coordination with AMFTRB, OPES, and DCA will include:

- Confirming the transition plan and timing
- Transferring relevant exam content and question bank materials, as appropriate
- Discontinuing development and administration of the California LMFT Clinical Exam
- Ensuring all applicants are transitioned to the national exam by January 2027

The last administration of the California LMFT Clinical Exam is expected to occur in November 2026. Beginning January 2027, all LMFT candidates will be required to pass the AMFTRB National Exam for licensure.

A detailed draft implementation plan is attached, outlining key activities and projected timelines for the transition. Staff will provide regular progress reports to the Board to ensure continued oversight and transparency throughout the implementation process.

Attachments

Attachment A: AMFTRB Transition Plan Draft

Attachment B: Letter of Support: California Association of Marriage and Family Therapy

Attachment C: Letter of Support: American Association of Marriage and Family Therapy

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Attachment A

Transition Plan: Adoption of the AMFTRB National Examination

Implementation Deadline: January 1, 2027

OUTREACH AND STAKEHOLDER COMMUNICATION		
Goal: Ensure applicants, candidates, educators and stakeholders are informed and prepared for the transition.		
Timeline	Milestone	Description
January 2026	Develop Outreach Plan	Identify audiences, communication channels, and key messages.
February 2026	Draft Information Materials & FAQs	Create materials outlining key changes, timelines and FAQs.
March, June, August	Host Informational Webinars	Conduct live webinars for stakeholders and exam candidates to explain transition and address questions.
March 2026 onward	Implement Outreach Plan	Maintain regular communication updates and stakeholder engagement.

SYSTEM DEVELOPMENT AND READINESS		
Goal: Ensure system functionality for transferring eligibilities, receiving results, and tracking candidate information.		
Timeline	Milestone	Description
December 2025	Confirm Professional Testing Corporation (PTC) and Prometric System Requirements	Identify system modifications needed to support the national exam.
January 2026	Review Requirements with the Office of Informational Services (OIS)	Collaborate with OIS to confirm system requirements.
May 2026	Develop System Enhancements	Implement system updates
June 2026	Conduct System Testing	Validate functionality and integrity.
August 2026	System Go-Live	Deploy updated system and begin internal use

RULEMAKING		
Goal: Adopt regulatory amendments authorizing the use of the AMFTRB National Exam.		
Timeline	Milestone	Description
January 2026	Production Phase	Draft regulation package, complete internal and DCA review
March 2026	Initial Phase	Submit to Office of Administrative Law for notice and publication; conduct public comment period.
May 2026	Final Phase	Finalize and file regulations; prepare implementation notice.

EXAMINATION TRANSITION		
Goal: Coordinate transition from the California LMFT Clinical Exam to the AMFTRB National Exam.		
Timeline	Milestone	Description
January 2026	Confirm Office of Professional Examination Services (OPES) Transition Plan	Establish timeline and process for stopping exam development and transferring relevant California exam content.
June 2026	Transfer California LMFT Clinical Exam Question Bank	OPES transfers agreed-upon items to AMFTRB.
November 2026	Final Administration of California Exam	Conclude all remaining administrations of the current California Clinical Exam.
January 2027	Launch of AMFTRB National Exam	All LMFT candidates begin taking the AMFTRB National Exam



November 6, 2025

Wendy Strack, BBS Chair
Board of Behavioral Sciences
1625 N Market Blvd-S200
Sacramento, CA 95834

RE: Supporting Transition to the AMFTRB National Exam

Dear Chairperson Strack and Board:

The California Association of Marriage and Family Therapists (CAMFT) represents the professional interests of over 39,000 Marriage and Family Therapists (MFTs) statewide. We join with the American Association for Marriage and Family Therapy (AAMFT) in expressing our strong support for the Board of Behavioral Sciences (BBS) in adopting the Association of Marital and Family Therapy Regulatory Board (AMFTRB) national exam as California's clinical exam for MFT licensure.

CAMFT applauds the signing of Senate Bill 775 and commends the BBS for its prompt action to begin rulemaking that would formally adopt the national exam for MFT licensure in California as early as January 1, 2027. We understand that AMFTRB will meet with the BBS in closed session at the November Board meeting to discuss questions related to the transition. CAMFT appreciates the opportunity to provide input on implementation concerns and key transition steps.

Benefits of Transitioning to the National Exam

California remains the only state of the 50 that has its own clinical exam and has not adopted the national exam. Here are several ways the transition to the national exam will help address the challenges and limitations currently experienced by California MFTs:

- 1. License Portability:** Transitioning to the national exam will ease the process of obtaining licensure in multiple states. Currently, CAMFT continues to work closely with AAMFT to advance license portability for California MFTs. However, we have been specifically informed of other states' hesitation in working with California due to its use of its own clinical exam. Although AAMFT and CAMFT have made progress in overcoming this barrier with some states, California's move to the national exam will likely result in greater consistency across states and eliminate the need for exceptions unique to California.

2. **Federal Opportunities:** Many federal-level job specifications do not recognize California's distinct clinical exam. CAMFT has invested significant resources and effort in advocating for special considerations due to the absence of the national exam. We believe a change to the national exam will align California's licensure standards with national requirements and expand professional opportunities for California MFTs.
3. **Access to Care:** As telehealth becomes increasingly utilized, it provides more opportunities for therapists to expand their practice, enhance timely access to care, and offer greater flexibility for providers and patients. The shift toward the national exam will help California therapists overcome jurisdictional challenges and promote better access to therapists and care delivery across state lines.

Concerns with Transitioning to the National Exam

CAMFT acknowledges and appreciates the Board's concerns regarding exam content and scope, racial bias, and accessibility of the national exam.

1. **Exam content and scope:** The concerns of exam content and scope stem around the differences between the state-specific practice and regulations in the BBS-administered clinical exam and the broader competencies assessed by the national exam. While these differences exist, we believe that ongoing collaboration with AMFTRB will help ensure that the national exam better reflects California laws and clinical realities. AMFTRB has shown willingness to incorporate California-specific content into the national exam. Examples of this progress include:
 - *Job Task Analysis (JTA):* In the last year, AMFTRB conducted a job task analysis survey to gather input from California MFTs regarding the tasks, knowledge, and skills that practitioners use in their daily practice. BBS and CAMFT actively supported this effort by promoting the survey and participation among California practitioners. AMFTRB recognizes that national practice trends are increasingly aligned with California practices, and the survey results will further identify key competencies and content areas to help better align exam content and measurement scope with California practice.
 - *Exam Construction:* AMFTRB has a robust exam development process that includes item-writing workshops, review by subject matter experts, oversight by its Exam Advisory Committee, content validation efforts, and post-administration analysis to ensure validity, fairness, and relevance of its content and scope. AMFTRB has also expressed interest in reviewing the BBS's LMFT written clinical exam question bank to assist them with addressing content concerns and ensuring content alignment with California's practice standards. Both CAMFT and the BBS have roles in the AMFTRB exam development process. CAMFT supports this work by encouraging California MFTs to act as AMFTRB subject matter experts (to participate in exam development activities). The BBS is a member of AMFTRB and can provide input, share feedback, and represent California's perspective in national meetings and committees that help guide exam development.

- 2. Racial bias:** Bias in standardized exams exists and can manifest in different ways. Racial, socioeconomic, and linguistic biases can unfairly disadvantage test takers from diverse backgrounds. CAMFT supports assessment and analysis of such bias within any standardized exam, and we believe that AMFTRB has more resources and technical capacity than the BBS in assessing for bias.
- *Differential Item Function Analysis:* AMFTRB collects voluntary demographic data from exam candidates and uses the data to conduct statistical analyses. This process helps identify if a particular test item is biased against a specific set of test takers. Test items that show significant bias are reviewed under the exam development process and are either revised or removed from the exam's question bank to ensure fairness.
- 3. Accessibility:** It is essential that there is adequate national exam access for California test takers. AMFTRB has acknowledged that incorporating California applicants will nearly double the number of test takers that the national exam currently serves. CAMFT has proactively engaged with AMFTRB to assess how testing frequency and location can be expanded to meet this increased demand. Based on our discussions, we are confident that the current exam availability can be improved to accommodate the large number of California test takers.
- *Frequency:* Currently, the national exam is only offered one week each month, whereas the BBS-administered clinical exam is offered Monday through Saturday year-round. The limited frequency of the national exam is partly due to exam version changes and the time required to validate exam forms. AMFTRB has noted that receiving BBS's LMFT written clinical exam question bank will help increase their ability to offer more frequent testing opportunities. We have not heard from AAMFT that the current exam frequency has been an issue in the other 49 states that use the national exam.
 - *Location:* AMFTRB currently administers its national clinical exam at select testing centers, with 17 test sites in California. AMFTRB has expressed interest in reviewing BBS data on exam usage across the state to inform decisions about adding additional testing locations, improving access for individuals living in rural areas of the state. CAMFT is committed to working with BBS and AMFTRB to ensure that test takers have reasonable access to exam locations without having to travel unreasonable distances.

CAMFT Support for National Exam Transition

CAMFT is committed to supporting the BBS throughout the transition period to the national exam. With any change to the Board's examination process, clear and transparent communication with test takers will be essential to ensure a smooth switchover between the exams. CAMFT is well-positioned and available to assist the BBS by communicating key updates and timelines regarding the switchover to MFTs.

Additionally, CAMFT can help BBS staff develop comprehensive Q&A documents and other informational resources to address questions about the transition. Our legal team has already

begun gathering inquiries from members to help identify areas where clarification and guidance will be most useful.

Thank you for your leadership and attention to this very important matter. We believe this transition will greatly advance the profession for California MFTs, and we are available to provide any further assistance or information that the Board may need.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cathy Atkins', with a long horizontal flourish extending to the right.

Cathy Atkins, JD
Deputy Executive Director

A handwritten signature in black ink, appearing to read 'Shanti Ezrine', with a long horizontal flourish extending to the right.

Shanti Ezrine, MPA
State Government Affairs Associate

cc: Steve Sodergren, BBS Executive Officer



November 14, 2025

Wendy Strack
Chair
Board of Behavioral Sciences
1625 N Market Blvd-S200
Sacramento, CA 95834

RE: Request for Adoption of the National MFT Exam

Dear Chair Strack,

On behalf of the American Association for Marriage and Family Therapy (“AAMFT”), we join with the California Association of Marriage and Family Therapists (“CAMFT”) in strongly supporting the Board’s current initiative to accept the Association of Marital and Family Therapy Regulatory Boards’ Marital and Family Therapy National Examination as the Clinical Exam for California Licensure as a Marriage and Family Therapist.

As a national professional association with members in every state, AAMFT is very familiar with the Association of Marital and Family Therapy Regulatory Boards (“AMFTRB”) National Exam, the history of the exam, and its utilization in other states. In this correspondence, we have included reasons we believe that the National Exam should be adopted as the MFT clinical exam in California.

Recognition of the MFT National Exam in 49 States

The MFT national exam is recognized in all other states and the District of Columbia as the clinical examination for licensure as an MFT. The origin of the national exam dates to the 1980s when other mental healthcare professionals were also initiating the development of their own clinical exams. The AMFTRB was formed in 1987 with the primary purpose of developing and administering a national MFT clinical exam. AMFTRB contracted with Professional Examination Services to produce the clinical exam, and the first MFT National Exam was given in 1989. The use of the exam became standard in the states that regulated the MFT profession. Historically, a small number of other states, in addition to California, had their own state-specific exam. However, by the mid-1990s, every other state that had administered its own exams had replaced these state exams with the MFT national exam.

National Exam Tests Competence and Skill

The purpose of the National Exam is to assist state licensure boards in determining if applicants for licensure have attained the necessary knowledge and experience for practice as a licensed MFT. Like other healthcare clinical examinations, the National Exam is designed to assess knowledge through questions focused on the tasks that an early-career MFT should be able to perform, and the knowledge required to successfully perform those particular tasks. Since 1989, thousands of MFTs have taken and passed the National Exam, representing almost all MFTs licensed outside of California. This exam has been adopted as the clinical exam in the remaining

49 states and the District of Columbia. The other states have continued to support the National Exam by maintaining this exam as the clinical examination for licensure. The National Exam has been very successful in the remaining states in serving its purpose in testing applicants for licensure.

Exam Frequency, Location and Cost

The National Exam is offered during a one-week testing period every month. The AMFTRB has greatly increased the frequency of when the exam is offered, and it is offered as often as or more often than other examinations for licensure are offered. For instance, in California and other states, the bar examination for attorneys is offered only twice a year. The cost to take the National Exam is in line with the cost to take the clinical exams for MHCs and CSWs, especially considering that there are many more MHCs and CSWs licensed in the United States than there are MFTs licensed in the United States. Regarding the number of locations that offer exams, we have not heard of complaints from test takers in other states regarding problems in accessing testing sites or that there are too few testing sites. A general rule in business is that costs can decrease when there is an increase in the number of people seeking a service or product. The adoption of the National Exam in California will greatly increase the number of test takers nationally. This increase in the number of test takers might lead to offering the exam more often each year.

Racial Bias Concerns

AAMFT acknowledges the legitimate concerns regarding racial biases in clinical exams and testing in general. AAMFT believes that all clinical exams for licensure or certification in any state and for any profession should address issues pertaining to racial biases.

Currently, all states require applicants for licensure as an MFT to pass a clinical examination for licensure. Although some have suggested alternative requirements to replace passing a clinical exam as a requirement for licensure, it is very unlikely that these alternatives, which have their own advantages and disadvantages, will replace the clinical examination requirement at this time.

Some researchers have reviewed both the National Exam and the current clinical exam. They have concluded that the National Exam is better than the California exam pertaining to the issue of racial bias. While there is more work to be done to address this important issue, the AMFTRB has stated that it is committed to not discriminating on the basis of race or any other characteristic or status protected under federal or California law.

Licensure Portability

The adoption of the National Exam will greatly facilitate the ability of California MFTs to obtain additional MFT licenses in other states. The ability to legally practice in other states, whether remotely through a telehealth practice into other states or by traveling outside of California, is almost essential for most MFTs, especially since 2020. AAMFT has been actively lobbying policymakers in other states to remove unnecessary barriers to the ability of out-of-state MFTs to become licensed in these states. However, California MFTs encounter an additional barrier. Several states require all applicants for licensure as an MFT to have first passed the National Exam, and they do not provide a method for out-of-state applicants who have only passed the California exam to become licensed in these states. Even in states that will license applicants who have passed the California exam, some of these states require applicants to submit copies of

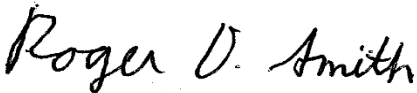
California's licensing requirements so that they can determine if California's requirements are substantially similar to their requirements or not. We believe that these restrictions are unnecessary. However, most of these restrictions will not go away anytime soon. For a variety of political and other reasons, some policymakers in these states are frankly hostile to the California exam and likely will not remove these California-specific restrictions. Adopting the National Exam will ensure that future licensees, who are more likely to be interested in obtaining licenses in other states than established clinicians, will not encounter this California exam barrier when applying for licensure in these states.

AAMFT strongly supports efforts by the BBS to adopt the AMFTRB National Exam as the clinical exam for applicants for MFT licensure in California. Thank you in advance for consideration of our comments. Please feel free to contact us at chrism@aamft.org or at rsmith@aamft.org if you have any questions or if you need any additional information from us.

Sincerely,



Christine Michaels
Chief Executive Officer
American Association for Marriage and Family Therapy



Roger Smith
Chief Advocacy Officer
American Association for Marriage and Family Therapy