



Board of Behavioral Sciences

Memo

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To: Board Members

Date: November 17, 2025

From: Rachael Lanzone
Budget Analyst

Subject: Discussion and Consideration of:

- a. **Comments Received During the 45-Day Public Comment Period and at the Regulation Hearing with Proposed Responses Thereto for the Board's Rulemaking to Amend Title 16 of the California Code of Regulations (CCR) Sections 1816, 1816.1, 1816.2, and 1816.4, Fee Reductions**
- b. **Adoption of Amendments to CCR, Title 16, Sections 1816, 1816.1, 1816.2, and 1816.4**

Background

At its May 2025 meeting, the Board approved the proposed regulatory text changes pertaining to its Fee Reductions. The proposed regulatory action was noticed to the public on September 19, 2025, and the 45-day public comment period ended on November 3, 2025. During the public comment period, the Board received a request for a hearing. A public hearing was held November 6, 2025, and the public comment period was extended to noon of that day. The original Board-approved language is provided in **Attachment A** for the Board's consideration. The Board received thirty-two written comments as summarized below, and which are provided in their entirety in **Attachments B – GG**. Staff's recommended responses to the comments are also provided below. The transcript of the public hearing is provided in **Attachment HH** for the Board's review.

Board Staff and Regulations Counsel recommend the Board approve the following proposed responses to the comments below.

- a. **Comments Received During the 45-Day Public Comment Period and Regulation Hearing with Proposed Responses Thereto for the Board's Rulemaking to Amend Title 16 of the California Code of Regulations (CCR) Sections 1816, 1816.1, 1816.2, and 1816.4, Fee Reductions**

Victoria Leftridge, LPCC, LPC (Attachment B)

In an email to the Board received on September 19, 2025 titled “Proposed Regulatory Change – Fee Reductions Comment”, the 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.”

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

Cecilia Renee Emery, MSSW, LCSW (Attachment C)

In an email to the Board received on September 19, 2025 titled “Pending Regulations: Fee Reductions”, the 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.”

Recommended 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.

Reyna Moreno, LMFT (Attachment D)

In an email to the Board received on September 19, 2025 titled “Request for Public Hearing on Fee Reduction Proposal”, the commenter stated,

“I would like to request a public hearing for the fee reduction proposed regulatory change. I feel like this is [sic]

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.”

Recommended 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.

Keonna Robinson, MA, LMFT (Attachment E)

In an email to the Board received on September 19, 2025 titled “Proposed Fee Reduction Regulation”, the 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.”

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

Laurel Tanner McKay Ed.S (Attachment F)

In an email to the Board received on September 19, 2025 titled “Reduced fees for LMFT's and LEP's”, the 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.”

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

Vicky Kwan, LCSW (Attachment G)

In an email to the Board received on September 19, 2025 titled “Fee Reduction Proposal”, the 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.

Recommended 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.

Stephen R. Goodman, LCSW (Attachment H)

In an email to the Board received on September 19, 2025 titled “Fee reduction”, the commenter stated they were in “100% favor of the fee reduction plan.”

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

Nicole Hanhan, LCSW (Attachment I)

In an email to the Board received on September 22, 2025 titled “Public Comment for Fee Reductions”, the 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.

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

Lauren Lazo (Attachment J)

In an email to the Board received on September 22, 2025 titled “Public Comment for Fee Reduction”, the 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.

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

Lexi Michaud (Attachment K)

In an email to the Board received on September 23, 2025 titled “Written Comment in Support of Proposed Action to Reduce Fees”, the 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.”

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

Heather McFarland, ACSW (Attachment L)

In an email to the Board received on September 24, 2025 titled “RE: NOTICE OF PROPOSED REGULATORY ACTION CONCERNING: Fee Reductions 16 CCR Sections 1816, 1816.1, 1816.2 and 1816.4”, the 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.

Recommended 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.

Brenna Turnbow, ASW (Attachment M)

In an email to the Board received on September 24, 2025 titled "Fee reduction", the 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.

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

Eva Hayek (Attachment N)

In an email to the Board received on September 24, 2025 titled "Reducing BBS Fees", the 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.”

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

Grace Schroeder (Attachment O)

In an email to the Board received on September 24, 2025 titled “Thoughts on Fee Reduction Proposal”, the 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.”

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

Kathryn Vos (Attachment P)

In an email to the Board received on September 24, 2025 titled “Proposed Action Fee Reduction”, the commenter stated their strong agreement for the proposed amendments. 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.

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

Deborah Hotchkiss (Attachment Q)

In an email to the Board received on September 26, 2025 titled "reducing fees", the 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."

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

Brandon Mears (Attachment R)

In an email to the Board received on September 26, 2025 titled "Comment on proposed fee reductions", the 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."

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

Emily Berry (Attachment S)

In an email to the Board received on October 2, 2025 titled "Fee Reductions", the 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.

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

Amanda Sharp (Attachment T)

In an email to the Board received on October 9, 2025 titled "Proposal for Fee Reduction Comment", the 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.

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

Shanti Ezrine, MPA, and Cathy Atkins, JD, Deputy Executive Director, California Association of Marriage and Family Therapists (CAMFT) (Attachment U)

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.

Recommended 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.

Recommended 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."

Recommended 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.

Emily S. Marsh, LCSW (Attachment V)

In an email to the Board received on October 10, 2025 titled “Proposed regulation to reduce BBS fees”, the 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.

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

Hanye Li, AMFT (Attachment W)

In an email to the Board received on October 10, 2025 titled “Comment on Proposed Fee Reductions”, the 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.

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

Debbi Odell, LMFT (Attachment X)

In an email to the Board received on October 10, 2025 titled “Proposed fee reduction comment”, the 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.”

Recommended 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.

Olga Rebecca Moreno (Attachment Y)

In an email to the Board received on October 13, 2025 titled “Proposed fee change”, the 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.”

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

Dusty Delhagen (Attachment Z)

In an email to the Board received on October 13, 2025 titled “Fee reduction comment”, the 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.

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

Nathan Roman (Attachment AA)

In an email to the Board received on October 13, 2025 titled “Fee Reductions”, the 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.

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

Dianne Daza (Attachment BB)

In an email to the Board received on October 14, 2025 titled “Comment on proppsed [sic] fee reduction”, the 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).

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

Karly Grace Vaughn, M.S., LMFT (Attachment CC)

In an email to the Board received on October 15, 2025 titled "Public Comment - Fee Reductions", the 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.

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

Rebecca Abraham (Attachment DD)

In an email to the Board received on October 16, 2025 titled "Written Comment in Support of BBS Fee Reductions", the 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.

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

Adrian Arrivillaga, AMFT (Attachment EE)

In an email to the Board received on October 17, 2025 titled “BBS Proposed Fee Reductions”, the 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.”

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

Nadine Nelson Manning (Attachment FF)

In an email to the Board received on October 19, 2025 titled “Support for BBS Fee Reductions”, the 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

Recommended 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.

Priyanka Yadvendu (Attachment GG)

In an email to the Board received on November 3, 2025 titled "Public Comments for Proposed Temporary Fee Reduction", the commenter wrote they would like to make their voice heard and contribute their public comments in support of the proposed regulations.

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

Oral Comment Received at November 6, 2025 Hearing (Attachment HH)

The Board received one oral public comment at the November 6, 2025 public hearing; a copy of the transcript of the hearing where the comment was made is attached.

Shanti Ezrine, Government Affairs Associate, CAMFT:

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.

Recommended Response: This oral comment provides a summary of the written comment previously provided by CAMFT on October 9, 2025. For the reasons noted previously, the Board rejects the comments regarding shortening the duration of the fee reduction period. The Board’s response to the original comments may be referenced above. No changes were made to the text based upon the comment.

b. Adoption of Amendments to CCR, Title 16, Sections 1816, 1816.1, 1816.2, and 1816.4

Staff Recommendation for Part a of this Agenda Item (Response to Comments):

Staff recommends the Board consider the comments and approve the recommended responses.

Proposed Motion Language – Response to Comments

Option No. 1 (If the members **agree** with the staff recommended responses): Direct staff to proceed as recommended as specified and provide the responses to the comments as indicated in the staff recommended responses.

Option No. 2: (If the members have any **edits** to the recommended responses **or disagree** with staff and wish to accept the comments or make any other changes to the responses): Direct staff to accept the following comments and make the following edits

to the text: [identify comment(s) to accept or reject and text to change here and explain why].

Staff Recommendation for Part b of this Agenda Item (Adoption of Amendments to CCR, Title 16, Section 1816, 1816.1, 1816.2, and 1816.4):

Staff recommends that the Board review the proposed regulatory text shown in **Attachment A** and consider whether to approve it as written, or to suggest changes to the proposed modified text. After review and discussion, consider one of the following motions:

Motion A: (To be used if the Board has **no** suggested changes for the proposed regulatory text):

Approve the proposed regulation text for CCR sections 1816, 1816.1, 1816.2, and 1816.4 as set forth in **Attachment A**, and direct staff to take all steps necessary to complete the rulemaking process, including the filing of the final rulemaking package with the Office of Administrative Law, authorize the Executive Officer to make any non-substantive changes to the proposed regulations and rulemaking file, and adopt amendments to Title 16, CCR, sections 1816, 1816.1, 1816.2, and 1816.4 as set forth in **Attachment A**.

Motion B: (To be used if the Board **does** have suggested changes for the proposed regulatory text)

Approve the proposed regulatory text as presented in **Attachment A** with the following changes: (*specify the proposed changes to the proposed text*) and direct staff to take all steps necessary to complete the rulemaking process, including preparing modified text for notice of a 15-day public comment period. If after that 15-day comment period, the Board does not receive any objections or adverse recommendations specifically directed at the modified text, the notice, or to the procedures followed by the Board in proposing or adopting this action, authorize the Executive Officer to make any non-substantive changes to the proposed regulations and rulemaking file, and adopt amendments to Title 16, CCR, sections 1816, 1816.1, 1816.2, and 1816.4 as set forth in in the modified text notice.

Attachments

Attachment A: Board-Approved Regulatory Language
Attachment B: Comment from the Victoria Leftridge, LPCC, LPC
Attachment C: Comment from Cecilia Renee Emery, MSSW, LCSW
Attachment D: Comment from Reyna Moreno, LMFT
Attachment E: Comment from Keonna Robinson, MA, LMFT
Attachment F: Comment from Laurel Tanner McKay Ed.S
Attachment G: Comment from Vicky Kwan, LCSW
Attachment H: Comment from Stephen R. Goodman, LCSW
Attachment I: Comment from Nicole Hanhan, LCSW
Attachment J: Comment from Lauren Lazo
Attachment K: Comment from Lexi Michaud
Attachment L: Comment from Heather McFarland, ACSW
Attachment M: Comment from Brenna Turnbow, ASW
Attachment N: Comment from Eva Hayek
Attachment O: Comment from Grace Schroeder
Attachment P: Comment from Kathryn Vos
Attachment Q: Comment from Deborah Hotchkiss
Attachment R: Comment from Brandon Mears
Attachment S: Comment from Emily Berry
Attachment T: Comment from Amanda Sharp
Attachment U: Comment from CAMFT (Shanti Ezrine)
Attachment V: Comment from Emily S. Marsh
Attachment W: Comment from Hanye Li
Attachment X: Comment from Debbi Odell
Attachment Y: Comment from Olga Rebecca Moreno
Attachment Z: Comment from Dusty Delhagen
Attachment AA: Comment from Nathan Roman
Attachment BB: Comment from Dianne Daza
Attachment CC: Comment from Karly Grace Vaughn
Attachment DD: Comment from Rebecca Abraham
Attachment EE: Comment from Adrian Arrivillaga
Attachment FF: Comment from Nadine Nelson Manning
Attachment GG: Comment from Priyanka Yadvendu
Attachment HH: November 6, 2025 Public Hearing on Fee Reductions Transcript

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Attachment A
TITLE 16. BOARD OF BEHAVIORAL SCIENCES
DEPARTMENT OF CONSUMER AFFAIRS

PROPOSED REGULATORY LANGUAGE
Fee Reductions
Title 16, Division 18, California Code of Regulations
Sections 1816, 1816.1, 1816.2 and 1816.4

Proposed amendments to the regulatory language are shown in <u>single underline</u> for text to be added and single strikethrough for text to be deleted.
--

AMEND SECTIONS 1816, 1816.1, 1816.2, AND 1816.4 IN TITLE 16 OF DIVISION 18 OF THE CALIFORNIA CODE OF REGULATIONS TO READ AS FOLLOWS:

§ 1816. Renewal Fees.

- (a) The annual renewal fee for associate marriage and family therapist registration is one hundred fifty dollars (\$150.00)- except for the period of time in subsection (h).
- (b) The annual renewal fee for associate clinical social worker registration is one hundred fifty dollars (\$150.00)- except for the period of time in subsection (i).
- (c) The annual renewal fee for associate professional clinical counselors registration is one hundred fifty dollars (\$150.00)- except for the period of time in subsection (i).
- (d) The biennial active renewal fee for a licensed marriage and family therapist is two hundred dollars (\$200.00)- except for the period of time in subsection (k).
- (e) The biennial active renewal fee for a licensed educational psychologist is two hundred dollars (\$200.00)- except for the period of time in subsection (l).
- (f) The biennial active renewal fee for a licensed clinical social worker is two hundred dollars (\$200.00)- except for the period of time in subsection (m).
- (g) The biennial active renewal fee for a licensed professional clinical counselor is two hundred dollars (\$200.00)- except for the period of time in subsection (n).
- (h) For the period of July 1, 2026, through June 30, 2030, the annual renewal fee for associate marriage and family therapist registration is seventy-five dollars (\$75.00).
- (i) For the period of July 1, 2026, through June 30, 2030, the annual renewal fee for associate clinical social worker registration is seventy-five dollars (\$75.00).

- (j) For the period of July 1, 2026, through June 30, 2030, the annual renewal fee for associate professional clinical counselor registration is seventy-five dollars (\$75.00).
- (k) For the period of July 1, 2026, through June 30, 2030, the biennial active renewal fee for a licensed marriage and family therapist is one hundred dollars (\$100.00).
- (l) For the period of July 1, 2026, through June 30, 2030, the biennial active renewal fee for a licensed educational psychologist is one hundred dollars (\$100.00).
- (m) For the period of July 1, 2026, through June 30, 2030, the biennial active renewal fee for a licensed clinical social worker is one hundred dollars (\$100.00).
- (n) For the period of July 1, 2026, through June 30, 2030, the biennial active renewal fee for a licensed professional clinical counselor is one hundred dollars (\$100.00).

NOTE: Authority cited: Sections 128.5, 4980.60 and 4990.20(a), Business and Professions Code. Reference: Sections 128.5, 4984.7, 4989.68, 4996.3 and 4999.120, Business and Professions Code.

§ 1816.1. Initial License and Registration Fees.

- (a) The fee for initial issuance of the licensed marriage and family therapist license shall be two hundred dollars (\$200.00)- except for the period of time in subsection (h).
- (b) The fee for initial issuance of the licensed educational psychologist license shall be two hundred dollars (\$200.00)- except for the period of time in subsection (i).
- (c) The fee for initial issuance of the licensed clinical social worker license shall be two hundred dollars (\$200.00)- except for the period of time in subsection (j).
- (d) The fee for initial issuance of the licensed professional clinical counselor license shall be two hundred dollars (\$200.00)- except for the period of time in subsection (k).
- (e) The application fee for an associate professional clinical counselor registration shall be one hundred fifty dollars (\$150.00)- except for the period of time in subsection (l).
- (f) The application fee for an associate marriage and family therapist registration shall be one hundred fifty dollars (\$150)- except for the period of time in subsection (m).
- (g) The application fee for an associate clinical social worker registration shall be one hundred fifty dollars (\$150)- except for the period of time in subsection (n).
- (h) For the period of July 1, 2026, through June 30, 2030, the fee for initial issuance of the licensed marriage and family therapist license is one hundred dollars (\$100.00).
- (i) For the period of July 1, 2026, through June 30, 2030, the fee for initial issuance of the

licensed educational psychologist license is one hundred dollars (\$100.00).

- (j) For the period of July 1, 2026, through June 30, 2030, the fee for initial license issuance of the licensed clinical social worker license is one hundred dollars (\$100.00).
- (k) For the period of July 1, 2026, through June 30, 2030, the fee for the initial license issuance of the licensed professional clinical counselor license is one hundred dollars (\$100.00).
- (l) For the period of July 1, 2026, through June 30, 2030, the application fee for an associate professional clinical counselor registration is seventy-five dollars (\$75.00).
- (m) For the period of July 1, 2026, through June 30, 2030, the application fee for an associate marriage and family therapist registration is seventy-five dollars (\$75.00).
- (n) For the period of July 1, 2026, through June 30, 2030, the application fee for an associate clinical social worker registration is seventy-five dollars (\$75.00).

NOTE: Authority cited: Sections 128.5, 4980.60 and 4990.20(a), Business and Professions Code. Reference: Sections 128.5, 4984.7, 4989.68, 4996.3 and 4999.120, Business and Professions Code.

§ 1816.2. Examination Fees.

- (a) The licensed clinical social worker California law and ethics examination fee shall be one hundred fifty dollars (\$150.00); except for the period of time in subsection (f).
- (b) The licensed marriage and family therapist California law and ethics examination fee shall be one hundred fifty dollars (\$150.00); except for the period of time in subsection (g).
- (c) The board administered licensed marriage and family therapist clinical examination fee shall be two hundred fifty dollars (\$250.00); except for the period of time in subsection (h).
- (d) The licensed educational psychologist written examination fee shall be two hundred fifty dollars (\$250.00); except for the period of time in subsection (i).
- (e) The licensed professional clinical counselor California law and ethics examination shall be one hundred fifty dollars (\$150.00); except for the period of time in subsection (j).

- (f) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed clinical social worker California law and ethics examination is seventy-five dollars (\$75.00).
- (g) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed marriage and family therapist California law and ethics examination is seventy-five dollars (\$75.00).
- (h) For the period of July 1, 2026, through June 30, 2030, the fee for the board administered licensed marriage and family therapist clinical examination is one hundred and twenty-five dollars (\$125.00).
- (i) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed educational psychologist written examination is one hundred and twenty-five dollars (\$125.00).
- (j) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed professional clinical counselor California law and ethics examination is seventy-five dollars (\$75.00).

Note: Authority Cited: 128.5, 4980.60 and 4990.20(a), Business and Professions Code.
Reference: Sections 128.5, 4984.7, 4989.68, 4996.3, and 4999.120, Business and Professions Code.

§ 1816.4. Examination-Eligibility Application Fees. Fees for Application for Licensure.

- (a) The fee for the licensed marriage and family therapist application for licensure shall be two hundred fifty dollars (\$250.00)- except for the period of time in subsection (e).
- (b) The fee for the licensed clinical social worker application for licensure shall be two hundred fifty dollars (\$250.00)- except for the period of time in subsection (f).
- (c) The fee for the licensed educational psychologist application for licensure shall be two hundred fifty dollars (\$250.00)- except for the period of time in subsection (g).
- (d) The fee for the licensed professional clinical counselor application for licensure shall be two hundred fifty dollars (\$250.00)- except for the period of time in subsection (h).
- (e) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed marriage and family therapist application for licensure is one hundred and twenty-five dollars (\$125.00).

(f) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed clinical social worker application for licensure is one hundred and twenty-five dollars (\$125.00).

(g) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed educational psychologist application for licensure is one hundred and twenty-five dollars (\$125.00).

(h) For the period of July 1, 2026, through June 30, 2030, the fee for the licensed professional clinical counselor application for licensure is one hundred and twenty-five dollars (\$125.00).

Note: Authority Cited: Sections 128.5, 4980.60 and 4990.20 (a), Business and Professions Code. Reference: Sections 128.5, 4984.7, 4989.68, 4996.3, and 4999.120, Business and Professions Code.

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Attachment B

From: [Victoria Leftridge](#)
To: Lanzone, Rachael@DCA
Subject: Proposed Regulatory Change – Fee Reductions Comment
Date: Friday, September 19, 2025 10:21:42 AM

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Hi Rachael,

I wanted to write in support of this bill. I think reducing fees across the board will increase access opportunities for more marginalized groups to get licensed. That will 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.

Thank you!

Warmly,

Victoria

Victoria Leftridge, LPCC, LPC

Field Placement Director

Master's in Counseling Psychology program

The Wright Institute | 1000 Dwight Way | Berkeley, CA 94710

Phone 510.841.9230 ext. 158

Pronouns: she/her

Attachment C

From: [Renee Emery](#)
To: Lanzone, Rachael@DCA
Subject: Pending Regulations: Fee Reductions
Date: Friday, September 19, 2025 10:29:59 AM

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Hello,

I am writing in support of the proposed Fee Reductions regulation. I am licensed in 3 other states besides California. The fees in California are twice as much as in the other states.

The lack of reciprocity in California is also outrageous, but I recognize that is not what these regulations are about. Regardless, after being licensed in Texas for over 3 years, it took a year to receive my license in California. It took less than 2 weeks to obtain licensure in Colorado, and less than a month to obtain licensure in Nevada.

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.

Thank you,

Cecilia Renee Emery, MSSW, LCSW
CA #67039

Attachment D

From: [Reyna Moreno](#)
To: Lanzone, Rachael@DCA
Subject: Request for Public Hearing on Fee Reduction Proposal
Date: Friday, September 19, 2025 11:22:00 AM

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Hi Rachael,

I would like to request a public hearing for the fee reduction proposed regulatory change. I feel like this is

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.

Best,

Reyna Moreno, LMFT

LIC #: 134173

Clinical Supervisor

She/Her/Hers

Western Youth Services

222 S. Harbor Blvd. Suite 650

Anaheim, CA 92805

Phone: 714.450.4205 | Fax: 714.817.7368

www.westernyouthservices.org

WYS Mission: Advancing awareness, cultivating success, and strengthening communities through integrated mental health services for children, youth, and families.

WE WELCOME DIVERSITY

ALL individuals valuing each other

We seek to provide a safe and inclusive space for ALL

We reject intolerance and any form of degradation or abuse of any kind

We commit in words and actions, to uphold the rights of ALL to feel safe, valued, and respected

WYS Welcomes ALL

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Attachment E

From: [Keonna Robinson](#)
To: [Berger, Christy@DCA](#); [Lanzone, Rachael@DCA](#)
Subject: Proposed Fee Reduction Regulation
Date: Friday, September 19, 2025 12:19:47 PM

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Greetings Rachael and Christy,

I hope this email finds you both well and in good spirits heading into the weekend. My reason for reaching out is to submit my written comment expressing my gratitude and full support for the Board's decision to consider the pending regulation to reduce licensure fees between 2026-2023. 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.

Thank you again to all those involved in the conversations and decision-making process regarding this matter. I hope to see this initiative come to fruition.

Blessings,

Keonna Robinson, MA, LMFT #130325

Founder/Owner - PEACE Wellness Collective

Clinical Training and Intern Coordinator - Hillsides Mental Health Agency

Assistant Professor, The Chicago School

Board of Directors & Committee Chair, California Association of Marriage and Family Therapists- Los Angeles Chapter (LA-CAMFT)

BBS Clinical Supervisor, Motivo Health

Member, CAMFT Chapter Advisory Council

CAMFT Certified Supervisor



Attachment F

From: [Laurel Tanner](#)
To: Lanzone, Rachael@DCA
Subject: Reduced fees for LMFT's and LEP's
Date: Friday, September 19, 2025 1:57:35 PM

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Dear Ms. Lanzone,

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

I, myself, have completed the application for LEP twice and did not submit it because of lack of funds at that time. Additionally, while a professional is holding a demanding, full-time job, it can be hard to predict when he or she will have time to study, schedule and take the test. These factors may make a professional think twice before fronting a large sum of money to begin the licensing process.

For me, the risk of losing \$500 if I was not able to take the test in the allotted amount of time or if I did not pass the test because I did not have time to study enough were additional factors that have kept me from applying for the LEP license. A price tag 50% lower than the current price reduces these risks significantly and greatly encourages me.

Additionally, I would like to express my belief that we need more mental health professionals in today's world. In having worked in education as a teacher and a school psychologist for more than 25 years, I have witnessed a sad general decline in children's mental health. Despite the heroic efforts which I have seen made to meet the mental health needs of children (and I have seen many excellent programs aimed at helping their parents and families as well), the needs are overwhelming and more mental health professionals are needed.

LEP's 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. Support from these LEP's often strengthen the efforts of the staff in schools by providing closer support for families, strengthening home/school collaboration and providing families with enhanced access to community resources.

I support the possibility of the reduction of fees for LMFT's and LEP's because it will make getting a license economically accessible to more professionals. Having more LMFT's and LEP's will, in turn, help more children, families and support the schools in managing the profound social-emotional and behavioral needs of children.

Thank you for allowing me the opportunity to comment on this important issue.

Sincerely,

Laurel Tanner McKay Ed.S

laurtann6@gmail.com

Attachment G

From: [Vicky Kwan](#)
To: Lanzone, Rachael@DCA
Cc: Berger, Christy@DCA
Subject: Fee Reduction Proposal
Date: Friday, September 19, 2025 2:17:50 PM
Attachments: [image001.png](#)

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Dear Ms. Lanzone,

In reviewing the regulation proposal, it's noted that LCSW Initial Clinical Exam Fees are not included as part of the fee reduction.

What is the rationale or was this a mistake that it was left out?

- Annual Renewal (AMFT, ASW & APCC): \$150 to \$75.
- Biennial Active Renewal (LMFT, LCSW, LPCC & LEPs): \$200 to \$100.
- Registration Application (AMFT, ASW & APCC): \$150 to \$75.
- Initial License Issuance (LMFT, LCSW, LPCC & LEP): \$200 to \$100.
- California Law & Ethics Exam (LMFT, LCSW & LPCC): \$150 to \$75.
- **LMFT Clinical Exam & LEP Written Exam: \$250 to \$125.**
- License Application (LMFT, LCSW, LPCC & LEP): \$250 to \$125

Vicky Kwan, LCSW (she/her) | Program Director

BBS LIC #26349

Pacific Clinics

Asian Pacific Family Center – Child, Youth & Family Program

9353 E Valley Blvd. Rosemead, CA 91770

Direct: 626-287-2988 ext 3214 | **Mobile:** 626-701-7380 | **Email:** VKwan@PacificClinics.org

Chat with me on Teams | Social Media: @PacificClinics



www.PacificClinics.org - Advancing Behavioral Healthcare

www.MYPCTL.org - Continuing Education and Workforce Development for Behavioral Healthcare

www.HealthNavigation.org - Certification Training for Peers and Paraprofessionals

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(W&I Code, Section 5328, 45 CFR 160 & 164).

Attachment H

From: [Stephen Goodman](#)
To: Lanzone, Rachael@DCA
Subject: Fee reduction
Date: Friday, September 19, 2025 7:11:25 PM

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I am 100% in favor of the fee reduction plan for professionals licensed through the BBS.

Thank You

Stephen R. Goodman LCSW

Attachment I

From: [Nicole Hanhan, LCSW](#)
To: Lanzone, Rachael@DCA
Subject: Public Comment for Fee Reductions
Date: Monday, September 22, 2025 10:28:54 AM

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Hi there,

Please accept this email as my public comment in support of fee reductions. As a licensed therapist and clinical supervisor in California, I strongly support the proposed amendments to 16 CCR Section 1816, 1816.1, 1816.2, and 1816.4 to reduce licensing and registration fees by 50% from July 1, 2026 through June 30, 2030.

This proposal provides important relief for both associates and licensed clinicians. The benefits include:

- **Equity:** Lower fees ensure the profession is accessible to those from all backgrounds, not just those who can afford the high costs of licensure.
- **Retention:** Clinicians are more likely to maintain active licenses when renewal fees are manageable, especially during times of financial hardship.
- **Sustainability:** Reduced costs help prevent burnout by allowing clinicians to allocate funds toward supervision, consultation, and wellness supports that sustain careers.
- **Quality of Care:** Clients benefit when clinicians can redirect resources into advanced trainings, certifications, and tools that directly improve mental health services.

This temporary but meaningful reduction strengthens the entire behavioral health workforce at a time when California faces urgent mental health needs. I urge the Board to adopt this proposal.

Nicole Hanhan, LCSW
Hanhan Wellness
(415) 449-4044
nicole@hanhanwellness.com
www.hanhanwellness.com

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Attachment J

From: [Lauren Lazo](#)
To: Lanzone, Rachael@DCA
Subject: Public Comment for Fee Reduction
Date: Monday, September 22, 2025 11:28:56 AM

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Hi There,

Please accept this email as my public comment in support of fee reductions. As an associate clinician working toward licensure in California, I strongly support the proposed amendments to reduce fees by 50% from July 1, 2026 through June 30, 2030. 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.

This proposal provides important relief for both associates and licensed clinicians. The benefits include:

- **Equity:** Lower fees ensure the profession is accessible to those from all backgrounds, not just those who can afford the high costs of licensure.
- **Retention:** Clinicians are more likely to maintain active licenses when renewal fees are manageable, especially during times of financial hardship.
- **Sustainability:** Reduced costs help prevent burnout by allowing clinicians to allocate funds toward supervision, consultation, and wellness supports that sustain careers.
- **Quality of Care:** Clients benefit when clinicians can redirect resources into advanced trainings, certifications, and tools that directly improve mental health services.

This temporary but meaningful reduction strengthens the entire behavioral health workforce at a time when California faces urgent mental health needs. I urge the Board to adopt this proposal.

Thanks so much,
Lauren

--

Logo



LAUREN LAZO

Mental Health Therapist

SPGTherapy.com



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Attachment K

From: [Lexi Michaud](#)
To: Lanzone, Rachael@DCA
Subject: Written Comment in Support of Proposed Action to Reduce Fees
Date: Tuesday, September 23, 2025 11:56:03 AM

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Hello,

My name is Lexi Michaud and this email is to express my support of your proposed action to reduce fees associated with the MFT and PCC licensure process with the BBS. I believe this fee reduction 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. Thank you.

Lexi Michaud

Attachment L

From: [Heather McFarland](#)
To: [Lanzone, Rachael@DCA](#)
Cc: [Berger, Christy@DCA](#)
Subject: RE: NOTICE OF PROPOSED REGULATORY ACTION CONCERNING: Fee Reductions 16 CCR Sections 1816, 1816.1, 1816.2 and 1816.4
Date: Wednesday, September 24, 2025 8:56:33 AM

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To Whom it May Concern,

This email is to acknowledge the proposal found below and to affirm my support as a current associate clinical social worker of said proposal. I currently work at a community health clinic in Orange County and have quickly learned all of the fees that go along with this field. In addition to school loans, the renewal fees, exam fees and courses to obtain CEUs are very financially taxing on a professional starting in the field. With the workload and nature of the work, the financial fees add to the burnout and could deter individuals from advancing or even staying in the field. I hope that this proposal is scheduled for a hearing at the department's earliest availability to review and hopefully pass for all current and future professionals. Additionally, I hope the board will consider the window of fee reduction to be moved up to January 1, 2026.

https://www.bbs.ca.gov/pdf/regulation/pending/fee_reduc_nopa.pdf

Warm Regards,
Heather McFarland, ACSW
LIC #: 121570

Attachment M

From: [Brenna Turnbow](#)
To: [Lanzone, Rachael@DCA](mailto:Lanzone,Rachael@DCA)
Subject: Fee reduction
Date: Wednesday, September 24, 2025 12:55:43 PM

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Hello,

Please accept this email as my public comment in support of fee reductions. As an associate clinical social worker in California, I strongly support the proposed amendments to 16 CCR Section 1816, 1816.1, 1816.2, and 1816.4 to reduce licensing and registration fees by 50% from July 1, 2026 through June 30, 2030.

This proposal provides important relief for both associates and licensed clinicians. The benefits include:

- **Equity:** Lower fees ensure the profession is accessible to those from all backgrounds, not just those who can afford the high costs of licensure.
- **Retention:** Clinicians are more likely to maintain active licenses when renewal fees are manageable, especially during times of financial hardship.
- **Sustainability:** Reduced costs help prevent burnout by allowing clinicians to allocate funds toward supervision, consultation, and wellness supports that sustain careers.
- **Quality of Care:** Clients benefit when clinicians can redirect resources into advanced trainings, certifications, and tools that directly improve mental health services.

This temporary but meaningful reduction strengthens the entire behavioral health workforce at a time when California faces urgent mental health needs. I urge the Board to adopt this proposal.

Thank you,

Logo



BRENNA TURNBOW, ASW

Mental Health Therapist

415-340-0174

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Attachment N

From: [Hayek, Eva](#)
To: Lanzone, Rachael@DCA
Subject: Reducing BBS Fees
Date: Wednesday, September 24, 2025 2:48:01 PM

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Dear Rachael,

I hope all is well with you!

I am writing to express my advocacy for reducing BBS fees by 50%. 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, I believe 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 we intend to heal moving forward.

In order to help others to the best of our ability, we must help ourselves first. I sincerely hope this proposal to reduce fees is taken into serious consideration.

Thank you for your time Rachael!

Best,
Eva

Attachment O

From: [Schroeder, Grace](#)
To: Lanzone, Rachael@DCA
Subject: Thoughts on Fee Reduction Proposal
Date: Wednesday, September 24, 2025 3:43:02 PM

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Dear Ms. Lanzone,

I am writing to express my strong support for the proposed amendments to Sections 1816, 1816.1, 1816.2, and 1816.4 that would reduce renewal, application, examination, and initial licensure fees by 50% from July 1, 2026, through June 30, 2030.

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. Many counseling students, myself included, are already navigating the burden of tuition, unpaid practicum experiences, and living expenses on limited to no income. For students and professionals who come from marginalized backgrounds, the financial pressures can feel even heavier, as we often have fewer family or community resources to draw on. I believe we need to make our field as accessible as possible so diverse folx with diverse backgrounds can serve the communities that need mental health support (now more than ever!)

Reducing fees directly supports emerging counselors like myself by making the licensure process more accessible and less intimidating. This proposal is not only a practical step toward reducing financial barriers but also a meaningful investment in the future of the profession. It helps ensure that 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.

I wholeheartedly support this proposal and appreciate the Board's efforts to make the counseling profession more accessible and equitable.

Warmly,

Grace Schroeder *(she/her)*

Clinical Mental Health Counseling Graduate Student

Principal Investigator - Cultivating Connections

[LinkedIn](#)

Attachment P

From: [Vos, Kathryn](#)
To: Lanzone, Rachael@DCA
Subject: Proposed Action Fee Reduction
Date: Wednesday, September 24, 2025 5:02:26 PM

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Good afternoon, Rachael,

I have read through the proposed action fee reduction and strongly agree with the proposed 50% reduction. This reduction would allow me as a trainee and soon to be associate marriage and family therapist spend less money on fees and invest more money into training and interventions to benefit my clients.

I hope the board takes action to reduce fees and make the field of counseling that much more accessible.

Thank you!
Kathryn Vos

Attachment Q

From: [Hotchkiss, Deborah](#)
To: Lanzone, Rachael@DCA
Subject: reducing fees
Date: Friday, September 26, 2025 1:08:28 PM

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Hi, Rachel,

I am a current counseling master's student at Cal State Fullerton, and I wanted to express my support for the proposed reduction of BBS fees. This would be such an amazing gift to so many of us who are struggling with expenses as we are trying to get started in the field. At a time when costs are only going up, a fee reduction by the BBS would also be proof that our profession truly values individual health and collective social justice.

Thanks for considering!

Sincerely,

Deborah Hotchkiss

Cal State Fullerton



Attachment R

From: [Brandon Mears](#)
To: [Lanzone, Rachael@DCA](#)
Cc: [Berger, Christy@DCA](#)
Subject: Comment on proposed fee reductions
Date: Friday, September 26, 2025 7:14:06 PM

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Hello,

I am writing in strong support of the Board of Behavioral Sciences' proposed amendments to 16 CCR §§ 1816, 1816.1, 1816.2, and 1816.4, which would temporarily reduce licensure and renewal fees by 50% from July 1, 2026, through June 30, 2030. 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.

Importantly, the fee reductions will ease financial barriers for students, associates, and new licensees who are entering the field while often managing significant educational debt. By making licensure more affordable, the Board will help strengthen California's behavioral health workforce at a time when access to care is critically needed. The estimated \$10.4 million in annual cost savings will directly benefit over 150,000 licensees and their employers, creating meaningful relief without imposing any new costs or burdens.

This 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. For these reasons, I respectfully urge adoption of the proposed fee reductions.

Thank you for taking the time to hear me out on this issue.

--

Brandon Mears

Attachment S

From: [Emily Berry](#)
To: Lanzone, Rachael@DCA
Subject: Fee Reductions
Date: Thursday, October 2, 2025 9:25:20 AM

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As an associate clinician working toward licensure in California, I strongly support the proposed amendments to reduce fees by 50% from July 1, 2026 through June 30, 2030. 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 training that strengthens our skills. Supporting early career clinicians in this way helps build a stronger behavioral health workforce to meet California's mental health needs. I urge the Board to adopt this proposal.

--

Logo



EMILY BERRY

she/her/hers

Mental Health Therapist

[SPGTherapy.com](#)



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Attachment T

From: [Amanda Sharp](#)
To: Lanzone, Rachael@DCA
Subject: Proposal for Fee Reduction Comment
Date: Thursday, October 9, 2025 11:58:53 AM

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Good Morning Rachael,

I would like to submit a comment of support for the fee reduction proposal. Reducing the fees would have a positive impact lowering the barriers towards licensure and maintaining licensure for individuals.

Best,

Amanda Sharp

--



Amanda Sharp, MA, AMFT

She/Her

Clinical Training Coordinator

MACLP Online Program

Graduate School of Education and Psychology

o: 310.568.5786



**CONNECT
ENRICH
ACHIEVE**

Attachment U

California Association of Marriage and Family Therapists
3298 Governor Dr. #22627, San Diego, CA 92192
Phone: (858) 292-2638 | Fax: (858) 292-2666 | www.camft.org

October 9, 2025

VIA EMAIL to rachael.lanzone@dca.ca.gov

Attn: Rachael Lanzone
Board of Behavioral Sciences
1625 North Market Blvd., Suite S-200
Sacramento, CA 95834

RE: Proposed Regulatory Language on Fee Reductions: Title 16, Division 18, California Code of Regulations (CCR) Sections 1816, 1816.1, 1816.2, and 1816.4

Dear Ms. Lanzone:

On behalf of our more than 39,000 members, the California Association of Marriage and Family Therapists (CAMFT) would like to comment on the proposed revisions to the Fee Reductions regulations as noticed on September 19, 2025, for public comment.

We understand that the Board of Behavioral Sciences (BBS) is proposing to reduce current fees to comply with the 24-month reserve limitation in Business and Professions Code Section 128.5(b). However, we respectfully submit the following questions and concerns for consideration in the final rulemaking:

- **Clarifying Reductions to Subsequent Registration Fees:** 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. We request clarification on whether the proposed reductions extend to subsequent registration fees.
- **Managing the Impact of Proposed Fee Reductions on Processing Times:** The BBS continues to face challenges in consistently meeting its application processing goals, particularly for LMFT and LCSW applications. Under California Code of Regulations Section 1805.1, the BBS's processing target goals are 30 business days for registration applications and 60 business days for licensure applications. However, the [BBS Sunset Review 2025](#) reported that average processing times were 99 business days for LMFTs and 89 business days for LCSWs, far surpassing established standards.

Given that processing times are already facing significant delays, we are questioning how the proposed fee reductions will impact processing demands under existing staffing levels. We understand that Business and Professions Code (BPC) Section 128.5(b) requires a reduction of fees once unencumbered funds reach an amount equal or more than the agency's operating budget for two fiscal years. But even with reducing fees, the fact remains that the Board will reach a maximum reserve fund balance. While we recognize that there may be statutory or regulatory limitations on the use of reserve funds, we are 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.

- **Shortening Duration of Proposed Fee Reductions:** As drafted, the proposed fee reductions would remain in effect for a four-year period (July 1, 2026, through June 30, 2030). We understand 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.

We are concerned about the four-year period of these fee reductions for several reasons. Firstly, the BBS's reserve fund has been previously affected by state-level borrowing to support the General Fund. Earlier this year, it was announced in the [Executive Officer Report](#) that the Governor's Budget included two significant budget reductions to state operations and positions. As we saw, the State Budget for Fiscal Year 2025-26 had to include many cuts and borrowing to address a \$12 billion shortfall. Further economic uncertainty is expected to continue under the current federal administration, and these conditions raise the real possibility of additional future borrowing from the BBS's reserves, which could undermine long-term financial stability.

Secondly, the BBS is also working on several major policy initiatives that could begin implementation as early as January 1, 2027. These include potential modifications to the licensure process and examination structure, and possible transition from the Board administered LMFT clinical exam to the AMFTRB national exam. Each initiative is complex, and will require significant staff resources for evaluation, planning, and implementation to prevent unintended consequences and ensure a smooth transition.

These major economic uncertainties and several significant changes to the BBS's operations can put significant financial pressure on the Board's operating expenses.

Accordingly, we request the BBS to consider shortening the duration of the proposed fee reduction period to one year (or two in the alternative) rather than four. This adjustment 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.

Thank you for considering our comments. We look forward to continuing the discussion regarding our concerns.

Sincerely,

A handwritten signature in black ink, appearing to be 'SE' with a long horizontal stroke extending to the right.

Shanti Ezrine, MPA
State Government Affairs Associate

A handwritten signature in black ink, appearing to be 'CA' with a long horizontal stroke extending to the right.

Cathy Atkins, JD
Deputy Executive Director

cc:

Christy Berger, Regulatory Manager, BBS

Attachment V

From: [Emily Marsh LCSW](#)
To: [Lanzone, Rachael@DCA](#); [Berger, Christy@DCA](#)
Subject: Proposed regulation to reduce BBS fees
Date: Friday, October 10, 2025 9:58:16 AM

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It is so rare to see a reduction in fees, and it is incredibly encouraging! I am in full support of an initiative that makes licensure more accessible to more people by reducing barriers such as the cost of the process.

Thank you so much for being involved in positive change and hearing comments from participants.

Warmly,
Emily S. Marsh LCSW (she/hers)
CA BBS #26725
CAMFT Certified Supervisor
PO BOX 688
Alameda, CA 94501
(510) 760-9100



Attachment W

From: [Li Hanye](#)
To: [Lanzone, Rachael@DCA](#); [Berger, Christy@DCA](#)
Subject: Comment on Proposed Fee Reductions
Date: Friday, October 10, 2025 11:57:00 AM

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Dear Ms. Lanzone and Ms. Berger,

I fully support the proposed 50% temporary fee reduction from July 1, 2026, through June 30, 2030. This thoughtful action will meaningfully reduce financial strain for trainees and licensees while keeping the Board fiscally sound. Thank you for prioritizing accessibility and supporting those entering the behavioral health field.

Warm regards,
Hanye Li, AMFT

Attachment X

From: [Client Support](#)
To: Lanzone, Rachael@DCA
Subject: Proposed fee reduction comment
Date: Friday, October 10, 2025 12:26:19 PM

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Hi Rachael,

I am writing in favor of the fee reduction. I am aware that many other states have much lower fees, even counting in cost of living and local wages.

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. Especially 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.

Debbi Odell
LMFT #146921
Work Phone: (805) 626-0234
Email: clientsupport@insightfulworldcreativity.com
Website: www.insightfulworldcreativity.com

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Email is not a secure form of communication. If you contact me via email, please only include information that you are comfortable sending with this in mind. If you are having a medical or mental health emergency, call 911 or go to your nearest emergency room. National Suicide Prevention Lifeline 988.

Attachment Y

From: [Olga Moreno "student"](#)
To: [Lanzone, Rachael@DCA](#)
Subject: Proposed fee change
Date: Monday, October 13, 2025 11:53:57 AM

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Dear BBS,

As a financially struggling student I welcome the fee reduction for licensing and exam fees.

This allows provides some equity in our ability to afford these items.

Respectfully,
Olga Rebecca Moreno

Attachment Z

From: [Dusty Delhagen "student"](#)
To: [Lanzone, Rachael@DCA](#)
Subject: Fee reduction comment
Date: Monday, October 13, 2025 11:55:31 AM

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Hello,

My name is Dusty Delhagen. I was given your email to make a comment on the BBS temporary fee reduction for exams and fees.

I feel as though this is a very good proposal especially with inflation right now.

I am graduating in December and would be very grateful to take advantage of this discount.

I feel as though these prices are the difference between some people being able to complete licensure and not due to the prices.

Thank you,
Dusty

Attachment AA

From: [Nathan Roman "student"](#)
To: [Lanzone, Rachael@DCA](#)
Subject: Fee Reductions
Date: Monday, October 13, 2025 8:50:43 PM

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Good Evening,

I was recently notified through Pepperdine about the potential for reduced fees in the near future. As a soon to graduate graduate student in the MFT program I would like to advocate for that.

Thank you,
Nathan Roman

Attachment BB

From: [Dianne Daza "student"](#)
To: [Lanzone, Rachael@DCA](#)
Subject: Comment on proppsed fee reduction
Date: Tuesday, October 14, 2025 11:48:43 AM

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Good morning,

I am a former student at Pepperdine in the MFT program and will be finishing in March of next year. I am a single mother of two and have been financially impacted by my own choice of wanting to pursue a higher education to give my children a better life and set the example of what tough sacrifices may bring. 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.

I hope this comment demonstrates the importance of lowering the fee, as it will give many students the opportunity to apply without financial barriers and will promote diversity and inclusivity for students who may not be able to apply as easily like myself.

Thank you,
Dianne Daza

Attachment CC

From: [Karly Grace Vaughn, LMFT](#)
To: Lanzone, Rachael@DCA
Subject: Public Comment - Fee Reductions
Date: Wednesday, October 15, 2025 5:15:02 PM

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As a licensed marriage and family therapist, I applaud the proposed amendments to Sections 1816, 1816.1, 1816.2, and 1816.4 of the California Code of Regulations. The proposed adjustments that reduce BBS licensing, exam, and renewal fees by 50% are a meaningful step toward both protecting California clinicians and ensuring the sustainability of our field. 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.

These amendments will not only ease financial burdens for clinicians but also protect the future of mental health care in the state. 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. I believe these changes show dedication to both clinicians and the clients we serve so that we can concentrate on providing quality care, rather than personal financial barriers. I urge lawmakers and stakeholders to adopt these amendments for the benefit of our profession and the well-being of Californians.

May balance find its way into your day,

Karly Grace Vaughn, M.S., LMFT
Licensed Marriage and Family Therapist
CA #152687 VA #0717002318
(840) 800-2080

If you are having a difficult time, know that you deserve help and care. If you need assistance, call:

[Crisis Chat & Call Line: 988](#)

[National Domestic Violence Hotline: 800-799-7233](#)

[Trevor Project Lifeline: 866-488-7386](#)

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karlygracelmft@gmail.com. Thank you.

Attachment DD

From: [Rebecca Abraham](#)
To: [Lanzone, Rachael@DCA](#)
Subject: Written Comment in Support of BBS Fee Reductions
Date: Thursday, October 16, 2025 9:29:40 AM

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Dear Ms. Lanzone,

I am writing in support of the proposed BBS fee reductions for examinations, licensure and renewals. I am currently a student in a Master's of Clinical Psychology program pursuing the LMFT designation. The need for MFT services is great, and continues to expand. There are many students like me trying to achieve licensure as quickly as possible to meet the need, but a barrier to many is the cost.

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. Since reducing the BBS fees will not adversely impact the BBS's ability to do its job effectively, there is no reason not to lower the fees, while there are many deeply compelling reasons to lower fees, as I stated earlier.

I am happy to provide any additional comments or color as needed. Thank you for your consideration.

Best,

Rebecca Abraham
Master's in Clinical Psychology (Expected 2027)
Antioch University Los Angeles
rabraham1@antioch.edu
(213) 505-3768

Attachment EE

From: [Adrian Arrivillaga](#)
To: [Lanzone, Rachael@DCA](#)
Subject: BBS Proposed Fee Reductions
Date: Friday, October 17, 2025 3:06:46 PM

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Dear Rachel Lanzone,

My name is Adrián Arrivillaga and I am an AMFT.

I am emailing today to express my support of the proposed regulatory action concerning fee reductions.

I think the proposed changes are an important step towards making the field more accessible. Throughout my time in graduate school and in the field I have often been discouraged by how expensive and inaccessible our profession can be. I believe reducing the fees could begin to help address this issue.

Best,
Adrián Arrivillaga (he/him) | AMFT #133926
Supervised by Mica Gonzalez PhD #26486
Bilingual Intake Coordinator
Family Spring Psychology
w: <https://myfamilyspring.com>
e: adrian@myfamilyspring.com
p: 510-224-3058

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Attachment FF

From: [Nadine Nelson Manning "student"](#)
To: [Lanzone, Rachael@DCA](#); [Berger, Christy@DCA](#)
Subject: Support for BBS Fee Reductions
Date: Sunday, October 19, 2025 11:52:35 AM

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Hello,

I am messaging in support of the BBS proposed fee reductions as outlined below. The reason I am in support of this is because, 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 minorities and single adults from being able to do comfortably. Any financial assistance that reduces this hardship is necessary. Thank you for supporting these changes. Additionally, I hope that we will see a legal requirement that internships are required to be paid at minimum hourly wage at the least.

"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"

Regards,

Nadine Nelson Manning
Pepperdine University
Graduate School of Education
and Psychology
M.A. Psychology

M.A. Clinical Psychology (in-progress)

Attachment GG

From: [Priyanka Yadvendu "student"](#)
To: [Lanzone, Rachael@DCA](#); [Berger, Christy@DCA](#)
Subject: Public Comments for Proposed Temporary Fee Reduction
Date: Monday, November 3, 2025 6:47:10 PM

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Dear Ms. Lanzone and Ms. Berger,

I would like to make my voice heard and contribute my public comments for the proposed temporary fee reduction for applicants, associates, and licensees. I support this proposed temporary fee reduction and proposal. Thank you so much!

Warmest Regards,
Priyanka Yadvendu

Attachment HH

November 6, 2025 Public Hearing on Fee Reductions Transcript

Marlon McManus, Board of Behavioral Sciences, Assistant Executive Officer:

Good morning,

My name is Marlon McManus, Assistant Executive Officer for the California Board of Behavioral Sciences, and I will be presiding over this hearing today at the Department of Consumer Affairs, Ruby Room, located at 1747 N. Market Blvd. Room number 182, Sacramento, CA.

Today's date is November 6th, 2025, and this hearing is beginning at 9:00 AM. This is the time and place set for the California Board of Behavioral Sciences to conduct a public hearing on the Board's proposed regulatory changes to sections 1816, 1816.1, 1816.2, and 1816.4 of Title 16 of the California Code of Regulations.

These proposed amendments would reduce fees by 50% for renewals, applications for registration, initial license issuance, law and ethics examinations, LMFT clinical examinations, LEP written examinations, and applications for licensure. These reduced fees would be in place from July 1st, 2026 through June 30th, 2030.

The regulation proposal was filed with the Office of Administrative Law and has been duly noticed. Copies of the proposed regulations have been sent—are sent—to interested parties.

This hearing is being held under the authority of section 4990.20 of the Business and Professions Code and the Administrative Procedures Act.

At this time, the hearing will be open to take oral testimony and documentary evidence from any person interested in these regulations for the record which is now being recorded.

All oral testimony and documentary evidence will be considered by the Board pursuant to the requirements of the Administrative Procedure Act before the Board formally adopts the proposed amendments to these regulations or recommends changes that may result from information collected at this hearing.

To ensure fairness and a complete record and to enable the Board to hear everyone who is giving testimony, the following procedures will be followed.

Please identify yourself by name and group, if any, you are representing.

If necessary, the amount of time each person has for oral testimony may be limited to two minutes.

All written testimony should be submitted to the Board. If you agree with another person's testimony, you may simply indicate your agreement on the record and need not repeat the prior testimony.

Written testimony may be summarized orally, but please do not read it into the record.

If any written comments have already been received on the proposal, they will be made a part of the permanent record.

It is not necessary to provide written comments previously submitted during this hearing.

The Board will not respond to objections or recommendations at this hearing. Its responses will be included in the final statement of reasons that will be filed with the Office of Administrative Law and posted on the Board's website.

A complete copy of the rulemaking file will be available for review at the Board's office in Sacramento, CA.

After all commenters have testified, the testimony phase of the hearing will be closed. The Board will continue to accept written comments on this proposal at the board's offices in Sacramento until 12:00 PM today.

Are there any questions concerning the nature of the proceedings or the procedure to be followed before we begin?

OK.

So please raise your hand if you wish to comment on the proposed regulations.

All right.

And we have Shanti.

Shanti Ezrine, Government Affairs Associate, CAMFT:

Good morning, and thank you for having this public hearing on the proposed fee reductions rulemaking.

My name is Shanti Ezrine, and I am the state government affairs associate with the California Association of Marriage and Family Therapists.

We represent the professional interest of over 39,000 MFTs across the state.

Now, we understand the reason for this rulemaking is to comply with the 24 month reserve limitation in Business and Professions Code, and CAMFT is supportive of these efforts that help MFTs save money as it pertains to fees for applications, exams, licensure and renewal.

And while all of that stands true, we recognize also that BBS is facing a staffing shortage. Application volumes continue to increase. Processing times are delayed beyond targeted goals.

Now, we really appreciate the efforts of the BBS to address these challenges with its current budget—things like cross training staff and implementing improvements to make it a more streamlined process are all very helpful, but the larger issues that I just covered still remain.

Now, we're not asking the BBS to avoid reducing existing fees. Again, we understand that the reserve limitation in law and that it is required because the reserve limit has been reached. However, we do believe 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.

We're 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 and while in no way do we want to increase the workload for staff, we are curious if this could be assessed by staff as an option as we are hopeful that executive and legislative branches can support the BBS in this reasonable budget proposal.

And as it pertains to the proposed fee reductions language itself, we do ask the BBS to consider shortening the duration of the proposed fee reduction period. This would still satisfy the requirement under Business and Professions Code while offering the BBS flexibility to explore potential staffing augmentations through the BCP process

and have enough in the reserve to withstand economic uncertainties, I'll close with this by saying that we understand it's not an easy process by any means and there is no guarantee that changes to BBS' budget will be approved, but we do believe this is a good opportunity for the BBS to get the staffing levels that they need and also help MFTs to receive prompt processing on their applications.

CAMFT is willing to help and support in whichever way we can, and I will also say we submitted written comment prior to this that provides more details on the points that I just covered.

Marlon McManus, Board of Behavioral Sciences, Assistant Executive Officer:

Thank you.

Alright, is there anyone else who would like to comment on the proposed regulations?

Since no one else wishes to speak or to provide comments, let the record reflect that it is now 9:07 AM and this regulation hearing is adjourned. Again, thank you for your attendance and participation.