



## MEMORANDUM

<b>DATE</b>	March 19, 2026
<b>TO</b>	Workforce Development Committee
<b>FROM</b>	Rosanne Helms, Legislative Manager
<b>SUBJECT</b>	<b>Discussion and Possible Recommendations Regarding Education Requirements for Licensed Marriage and Family therapists: Accreditation, Core Content, and Practicum Requirements</b>

### Introduction

In July 2025, the Committee kicked off a project to streamline and modernize the education requirements for Licensed Marriage and Family Therapists (LMFTs). Today we will continue this discussion, focusing on practicum requirements.

### Background

The goal of this effort is to consolidate the multiple pathways to licensure (e.g. in-state applicants versus out-of-state applicants) into a single streamlined pathway. Additionally, educational requirements will be examined to determine if modernization of the required content is desired.

Once amendments for LMFTs are developed, the Committee will move on to doing the same for the LPCC and then the LCSW practice acts.

The LMFT education requirements are complex, and many individual requirements need to be examined in depth. Due to this, the Committee determined that it would be best to split this effort into several small pieces. Areas to be examined are as follows:

1. **Step 1: Qualifying Degree Accreditation, Core Content and Practicum Requirements (*To be discussed today; draft language in Attachment A*)**  
Conduct a detailed discussion of the required features a qualifying degree must have, including accreditation, core content, and practicum.
2. **Step 2: Graduate-Level Course Content and Allowable Remediation (*To be discussed today.*)**  
Define which course content areas should be required at a graduate level, what the coursework should entail, the required unit amounts, and the appropriate limits of remediation. Examples of graduate-level course content include assessment, diagnosis, and lifespan development.
3. **Step 3: Supplemental Coursework Requirements (Content allowed as Continuing Education)**

Review the Board's supplemental course content areas individually for needed updates or modernization. This is content that must cover specific areas, usually measured in hours instead of units. Instead of being required as graduate level coursework, remediation via continuing education courses is permitted. Examples include child abuse assessment, substance use disorders, and suicide risk assessment.

**4. Step 4: National Attainability and Unintended Consequences**

Once all of the above have been determined, the proposed requirements should be reviewed again as a whole to ensure they are reasonably attainable for graduates of programs nationwide and to ensure they do not unintentionally disqualify a significant number of applicants. *Note: Path A (for licensees with at least two years of equivalent licensure in another state) will remain available.*

**5. Step 5: Pre-Degree Hours**

Examine the requirements for MFT trainees in practicum counting pre-degree hours and explore extending the same allowance to PCC trainees and social work interns.

**6. Step 6: Provisional Associate Registration Concept**

Explore whether implementation of the new education framework presents an opportunity to formalize the current "90-day rule" by creating a one-year provisional associate registration for applicants who apply within 90 days of degree conferral. This would bring them under the Board's jurisdiction while they await issuance of their full associate registration.

**7. Step 7: Formal Approval of School Programs**

Consider implementing a formal process to recognize and approve school programs that meet the Board's requirements for a qualifying degree.

**Background Information: Course Timing and School Location**

While discussing potential changes, it is important to keep in mind that this proposal will depart from existing law in two major ways:

Course Timing: Current law allows remediation of certain coursework at various times throughout the licensing process, with some courses needing remediation prior to licensure and some needing remediation prior to associate registration. Course remediation requirements are inconsistent across license types. In an effort to streamline the law and promote public protection by ensuring competency in all required subjects, this proposal will require all courses that are permitted to be remediated to be remediated prior to associate registration.

School Location: Current law sets licensing requirements based on whether the degree was earned at an "in-state" versus an "out-of-state" school. This is increasingly problematic with the increase of online schools, and schools who may have sites in California but that are headquartered elsewhere.

This proposal will eliminate separate requirements for “in-state” and “out-of-state” schools, instead establishing one uniform set of requirements for all applicants.

This distinction matters because California schools primarily serve students intending to obtain California licensure and, as a result, are more likely to design their programs to meet the Board’s requirements. Schools located outside California, however, are less likely to tailor their curricula to align specifically with California licensure standards.

### **Subject Matter Experts**

To support the Committee and staff in evaluating current educational needs, practices, and standards, a team of three subject matter experts (SMEs) was assembled to provide ongoing guidance throughout this process. These individuals are highly credentialed licensees and educators in the LMFT and LPCC fields, each bringing extensive experience and expertise in clinical education and professional training. The SME advisory team includes:

- Dr. Leah Brew, LPCC, and Professor in the Department of Counseling at California State University, Fullerton. She is also a subject matter expert reviewing LMFT and LPCC programs and a former BBS LPCC Board member,
- Benjamin E. Caldwell, PsyD, LMFT, adjunct faculty in the MFT program at California State University Northridge.
- Diana Herweck, PsyD, LMFT, LPCC, LPC (CT), NCC, ACS; Director of Clinical Training, Palo Alto University. She is also a former BBS LPCC Board member.

### **Previous Committee Discussion**

The Committee discussed Step 1 – Qualifying Degree Accreditation, Core Content, and Practicum Requirements – at its meeting on January 15, 2026.

Accreditation: Potential language regarding school accreditation, including possible acceptance of COAMFTE and CACREP-MFT specialty accreditation in lieu of direct review of some educational requirements was discussed. While the main language regarding school accreditation is set, the Committee will need to circle back later, after practicum requirements, graduate level coursework requirements, and supplemental coursework requirements have been determined in detail, to determine which, if any, requirements will be assumed complete if a school has COAMFTE or CACREP-MFT accreditation.

Core Content: The core content, or program structure, language was also discussed and set at the January 15<sup>th</sup> meeting. That language moves away from naming specific acceptable degree titles, and instead requires a qualifying degree to:

- Be a planned course of study grounded in systemic theory and approaches primarily designed to train a person to provide direct therapeutic services within the context of marriage and family systems.
- Specify in institutional catalogues/brochures/official program descriptions that the intent of its degree program is to educate and train marriage and family therapists.
- Integrate marriage and family therapy principles throughout its curriculum.
- Develop its students' abilities to explore and apply culturally responsive skills and interventions.

### **Today's Discussion: Practicum**

Today's discussion will focus primarily on the practicum requirement. At our last meeting, board members expressed that the current practicum framework needs additional refinement. Key issues raised included:

- The need for further review of the number of required practicum hours.
- Clarification regarding the qualifications and expectations of practicum supervisors.
- A request from the schools for more detailed guidance on practicum standards so the Board's expectations are clearly understood.

All of these considerations must be balanced with two guiding principles:

1. Practicum components cannot be remediated, and
2. We are working toward a model that does not differentiate between in-state and out-of-state schools, meaning the practicum requirements must be attainable and clearly defined for all programs, not just those located in California.

Required Practicum Hours: After discussion, the SMEs recommend requiring 240 practicum hours. This is an increase from the current 225 required but is less than the LPCC-required 280 hours.

Supervisor Qualifications: MFT trainees count pre-degree hours, so they are already required to have practicum supervision that meets the Board's supervision standards for associates. The practicum requirements spell this out more clearly now. The site supervisor must be a licensee that meets the board's supervisor qualifications as specified in BPC [§4980.03\(g\)](#) (specified license type, licensed 2 of the past 5 years, practiced psychotherapy or supervised for 2 of the past 5 years, has an active CA license, and has completed supervision training).

The proposed language also now spells out that if services were provided in another jurisdiction, the supervisor must have held a specified license type and had an active license for 2 of the past 5 years. This is consistent with what the Board requires for associate hours gained out-of-state.

The school is required to verify the supervisor's license and qualifications before a trainee begins gaining hours.

Specific Practicum Requirements: At the last meeting, stakeholders expressed interest in more clearly defining what constitutes an acceptable practicum placement so that schools have improved guidance and to ensure trainees are engaged in appropriate clinical work. Staff worked with the SMEs to outline requirements intended to support high-quality training without being so prescriptive that they disadvantage students from out-of-state programs. The proposed requirements include:

- School approval of each site and a written agreement between the site, student, and school that outlines each party's responsibilities and the scope of the clinical services.
- A requirement that the site or school monitor the trainee's clinical work and conduct at least one observation for each trainee.
- A requirement that trainees demonstrate specified clinical tasks.
- A requirement that direct client contact hours consist of psychotherapy or clinical counseling services, accompanied by a clear definition of these activities to ensure consistency.

The above practicum requirements would only apply to degrees begun on or after January 1, 2030. This would give schools time to adjust and would not adversely affect individuals currently earning their degrees. Practicum requirements for those with older degrees (degrees begun before January 1, 2030 or degrees begun before August 1, 2012 and completed before December 31, 2018) would remain unchanged.

### **Recommended Next Steps**

Conduct an open discussion regarding the proposed language in **Attachment A**. Direct staff to make any discussed changes and any nonsubstantive changes.

### **Attachments**

**Attachment A:** Proposed Language: Draft LMFT Education Requirements - BPC §4980.36 (Partial)

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**ATTACHMENT A**  
**DRAFT LMFT EDUCATION REQUIREMENTS**  
*(Incorporates new law changes effective January 1, 2026)*  
*(3.13.2026 Version)*

**Business and Professions Code (BPC) § 4980.36. QUALIFYING DEGREE PROGRAM FOR LICENSURE OR REGISTRATION; GRADUATE STUDY BEGAN ON OR AFTER AUGUST 1, 2012 OR COMPLETED AFTER DECEMBER 31, 2018**  
**REQUIRED EDUCATION FOR LICENSURE OR REGISTRATION**

(a) This section shall apply to the following:

- (1) Applicants for licensure or registration who begin graduate study before August 1, 2012, and do not complete that study on or before December 31, 2018.
- (2) Applicants for licensure or registration who begin graduate study before August 1, 2012, and who graduate from a degree program that meets the requirements of this section.
- (3) Applicants for licensure or registration who begin graduate study on or after August 1, 2012.

This section shall apply to all applicants for registration or licensure as a marriage and family therapist in California. Qualifying applicants shall possess a master's or doctoral degree in marriage and family therapy or in a related mental health field that contains no less than 60 semester units or 90 quarter units of graduate level instruction, and that meets the requirements of subsections (b) through (d).

(b) To qualify for a license or registration, applicants shall possess a doctoral or master's degree meeting the requirements of this section in marriage, family, and child counseling, marriage and family therapy, couple and family therapy, psychology, clinical psychology, counseling psychology, or either counseling or clinical mental health counseling with an emphasis in either marriage, family, and child counseling or marriage and family therapy. The degree shall be obtained from a school, college, or university approved by the Bureau for Private Postsecondary Education, or accredited by either the Commission on Accreditation for Marriage and Family Therapy Education, or a regional or national institutional accrediting agency that is recognized by the United States Department of Education. The board has the authority to make the final determination as to whether a degree meets all requirements, including, but not limited to, course requirements, regardless of accreditation or approval.

(b) Accreditation. The qualifying degree required by subdivision (a) shall be from an educational institution that is accredited by a regional or national institutional accrediting agency that is recognized by the United States Department of Education

or approved by the Bureau for Private Postsecondary Education. If the qualifying degree program is additionally accredited by the Commission on Accreditation for Marriage and Family Education or by the Council for Accreditation of Counseling and Related Educational Programs with the specialization in Marriage, Couple, and Family Counseling, then Board shall accept that it meets all requirements of subdivisions (c) and (xx)

(c) **Program Structure.** ~~A doctoral or master's degree program that qualifies for licensure or registration shall be a single, integrated program that does the following:~~ The qualifying degree required by subdivision (a) shall be a single, integrated program that meets all of the following criteria:

- 1) Shall be a planned course of study grounded in systemic theory and systemic approaches that is primarily designed to train a person to provide direct therapeutic services to assist individuals, families, and intimate or romantic partners in resolving cognitive, affective, behavioral, or relational dysfunctions within the context of marriage and family systems.
- 2) Shall specify in institutional catalogues, brochures, or official program descriptions that the intent of the degree program is to educate and train marriage and family therapists. This includes but is not limited to, statements indicating that the program prepares students to pass the national marriage and family therapy examination, or statements that the program prepares students for marriage and family therapy state licensure.

~~(1) Integrate all of the following throughout its curriculum:~~

- ~~(A) Marriage and family therapy principles.~~
- ~~(B) The principles of mental health recovery-oriented care and methods of service delivery in recovery-oriented practice environments, among others.~~
- ~~(C) An understanding of various cultures and the social and psychological implications of socioeconomic position, and an understanding of how poverty and social stress impact an individual's mental health and recovery.~~

3) Shall integrate marriage and family therapy principals throughout its curriculum.

4) Shall develop its students' abilities to explore and apply culturally responsive skills and interventions.

~~(2) Allow for innovation and individuality in the education of marriage and family therapists.~~

~~(3) Encourage students to develop the personal qualities that are intimately related to effective practice, including, but not limited to, integrity, sensitivity, flexibility, insight, compassion, and personal presence.~~

- (4) ~~Permit an emphasis or specialization that may address any one or more of the unique and complex array of human problems, symptoms, and needs of Californians served by marriage and family therapists.~~
- (5) ~~Provide students with the opportunity to meet with various consumers and family members of consumers of mental health services to enhance understanding of their experience of mental illness, treatment, and recovery.~~
- (d) ~~The degree described in subdivision (b) shall contain no less than 60 semester or 90 quarter units of instruction that includes, but is not limited to, the following requirements:~~
- (1) ~~Both of the following:~~
- (A) ~~No less than 12 semester or 18 quarter units of coursework in theories, principles, and methods of a variety of psychotherapeutic orientations directly related to marriage and family therapy and marital and family systems approaches to treatment and how these theories can be applied therapeutically with individuals, couples, families, adults, including elder adults, children, adolescents, and groups to improve, restore, or maintain healthy relationships.~~
- (d) Practicum.** (B) ~~Practicum that involves direct client contact, as follows:~~
- (i) ~~A minimum of six semester or nine quarter units of practicum in a supervised clinical placement that provides supervised fieldwork experience.~~
- (ii) ~~A minimum of 150 hours of face-to-face experience counseling individuals, couples, families, or groups.~~
- (iii) ~~A student must be enrolled in a practicum course while counseling clients, except as specified in subdivision (c) of Section 4980.42.~~
- (iv) ~~The practicum shall provide training in all of the following areas:~~
- (I) ~~Applied use of theory and psychotherapeutic techniques.~~
- (II) ~~Assessment, diagnosis, prognosis, and treatment planning.~~
- (III) ~~Treatment of individuals and premarital, couple, family, and child relationships, including trauma and abuse, dysfunctions, healthy functioning, health promotion, illness prevention, and working with families.~~
- (IV) ~~Professional writing, including documentation of services, treatment plans, and progress notes.~~
- (V) ~~How to connect people with resources that deliver the quality of services and support needed in the community.~~

~~(v) Educational institutions are encouraged to design the practicum required by this subparagraph to include marriage and family therapy experience in low income and multicultural mental health settings.~~

~~(vi) In addition to the 150 hours required in clause (ii), 75 hours of either of the following, or a combination thereof:~~

~~(I) Client centered advocacy, as defined in Section 4980.03.~~

~~(II) Face to face experience counseling individuals, couples, families, or groups.~~

The qualifying degree shall include a minimum of six semester or nine quarter units of supervised clinical practicum that provides and supports supervised fieldwork experience in order to develop psychotherapeutic skills, as follows:

(1) For applicants who begin their qualifying degree program on or after January 1, 2030, the practicum shall meet all of the following:

(A) Provide a minimum of 240 hours of direct face-to-face psychotherapy or clinical counseling experience with individuals, intimate or romantic partners, families or groups. For purposes of this section, "face-to-face" means in-person or synchronous, two-way audiovisual telehealth.

(B) The site supervisor of the practicum hours shall be a licensed mental health professional that meets the requirements to supervise pursuant to subdivision (g) of section 4980.03, or for clinical services lawfully provided to clients in another jurisdiction, the supervisor must have been licensed at the highest level for independent clinical practice as a licensed clinical social worker, licensed marriage and family therapist, licensed professional clinical counselor, licensed psychologist, board-certified psychiatrist in that jurisdiction, or equivalent out-of-state licensee and must have:

(i) Held such license for at least two years of the five year period immediately prior to the commencement of supervision;

(ii) Maintained the license in active and good standing during the period of supervision.

Programs shall verify supervisor licensure and qualifications are consistent with the applicable statute and regulations before a trainee accrues hours at the site

(C) The school approves each practicum site and evaluates all practicum placements, including the clinical appropriateness of services offered and site compliance with program standards.

(D) Have a written agreement with the school program, site where the hours are being accrued, and the student. The written agreement shall specify learning objectives, the responsibilities of each party, the scope of clinical services, provisions for regular progress reports and evaluations of student performance at the site, and supervision methods.

(E) Make provisions for the site or school program to monitor clinical work, including direct observation or review of audio or video recordings at least once for each trainee. If observation or recording is not permissible under law or site policy, the site or school program shall conduct and evaluate a standardized clinical simulation.

(F) Require trainees to demonstrate clinical tasks, including:

- i. Case notes and case conceptualizations grounded in evidence-based theory, with explicit attention to culture, diversity, and social determinants.
- ii. Treatment plans with measurable goals.
- iii. Documenting ethical decision making; and
- iv. Applied assessment and diagnostic practice using current nationally recognized resources (such as the most recent version of the Diagnostic and Statistical Manual of Mental Disorders or the International Classification of Diseases).

(G) Ensure that direct client contact hours used to satisfy subparagraph (A) are psychotherapy or clinical counseling in nature. For purposes of this paragraph, these terms have the following meanings:

- i. Psychotherapy means treatment, diagnosis, testing, assessment, or counseling delivered within a professional relationship to alleviate behavioral and mental health disorders; resolve emotional, relationship, or attitudinal conflicts; understand motivation; or modify behaviors interfering with functioning. Psychotherapy follows a planned procedure of intervention and may occur over time or as a single brief intervention when clinically indicated.
- ii. Clinical counseling means advanced, regulated practice focused on the diagnosis and treatment of mental health conditions, addressing distress and adjustment issues, and facilitating wellness for individuals, intimate or romantic partners, families, and groups.

(2) For applicants who begin their qualifying degree program before January 1, 2030 but who do not fall within the timeline specified in paragraph (3), the qualifying degree shall include a minimum of 150 hours of face-to-face experience counseling individuals, intimate or romantic partners, families or groups, plus an additional 75 hours of either client centered advocacy, as defined in section 4980.03, or face-to-face experience counseling individuals, intimate or romantic partners, families or groups, or a combination thereof. The practicum shall provide training in applied use of theory and psychotherapeutic techniques, assessment, diagnosis, prognosis, and treatment planning, treatment of clients, professional writing, and connecting clients with community resources.

(3) For applicants who began graduate study before August 1, 2012, and completed that study on or before December 31, 2018, the qualifying degree shall meet the practicum requirements specified in section 4980.37.

(4) Trainees subject to paragraphs (1) or (2) above shall be enrolled in a practicum course while counseling clients who are located in California, except as specified in subdivision (b) of section 4980.42.

**ADDITIONAL SUBDIVISIONS OF BPC §4980.36 TO BE DISCUSSED AT FUTURE MEETINGS**

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