



MEMORANDUM

DATE	March 18, 2026
TO	Workforce Development Committee
FROM	Rosanne Helms, Legislative Manager
SUBJECT	Discussion and Possible Recommendations Regarding Education Requirements for Licensed Marriage and Family Therapists: Defining an Integrated Degree Program and Allowing Transfer Units

Background

Current law (Business and Professions Code §§4980.36(c), 4980.37(b)) requires a qualifying master’s or doctoral degree to be a single, integrated degree program. This means that certain core coursework, such as practicum and number of units of instruction, must be contained within the qualifying degree. In contrast, other additional coursework that is not considered core coursework, such as suicide risk assessment or training on provision of services via telehealth, can be transferred from another degree program or taken as continuing education after completion of the degree.

The single, integrated degree requirement is intended to ensure that the degree is part of a cohesive program specifically designed to lead to licensure as a Marriage and Family Therapist (MFT), rather than pieced together from multiple programs or degrees that are not focused on MFT education or are not intended to prepare students for LMFT licensure.

The requirement that the qualifying degree be a single, integrated program is not new. However, as programs evolve, questions have been raised regarding what constitutes a “single, integrated program” and what, if any, exceptions may apply. For example, at times questions arise about how to treat units earned at a school that later closes, graduate coursework completed before the student formally enters the program, or coursework taken as part of a combined master’s and doctoral pathway. In an effort to clarify these issues and provide limited flexibility and consistent application of the law, while maintaining the law’s intent that a degree is not assembled from multiple unrelated programs, staff proposes a new section defining an integrated degree and establishing narrow exceptions (**Attachment A**). The Committee should discuss the provisions of this section.

Need for Clarification

Transcript reviews and program structures demonstrate variation in how institutions interpret the requirement for a single, integrated degree. Without a statutory definition, schools and applicants apply inconsistent standards, resulting in confusion, delayed applications, and situations where otherwise strong candidates may be denied because their transcripts do not clearly reflect a single integrated program.

Staff have identified several recurring situations that highlight the need for clearer statutory guidance:

1. School Closures

In situations where an institution permanently closes, students may need to transfer coursework into a new program. Without clear rules, it can be difficult to determine how much coursework may be accepted and how it should be reflected on the transcript.

2. Formally Structured Combined Master’s/Doctoral Programs

Some institutions offer intentionally designed combined programs where coursework spans both the master’s and doctoral levels. Without clarification, it is unclear whether programs meet the definition of a single, integrated degree program.

3. Master’s-Level Transfer Credit From Another Graduate Program

At times, an applicant may begin an MFT program at one graduate school, and for various reasons may decide to transfer to a different graduate school. Or, they may complete one master’s degree that contains some MFT-related content, and then begin an MFT degree program and wish to transfer some of that content into their MFT degree. In this situation, it would be helpful to have clarity regarding how many units may be transferred without undermining the requirement that the qualifying degree be a single, integrated program, and how that coursework should be reflected on a transcript.

4. Graduate-Level Coursework Completed During Undergraduate Studies

Some applicants complete graduate-level courses while still undergraduates, and schools later count these units toward the qualifying degree. When those units were not originally taken as part of the graduate program, it becomes difficult to determine whether the coursework fits within an integrated degree structure.

These examples highlight the need for clearer guidance so that programs understand how to structure and document their degrees, and applicants have predictable, fair outcomes.

Summary of Proposed Language

Attachment A proposes a statutory definition of a single, integrated degree and establishes clearly defined exceptions under which coursework may be transferred into the qualifying degree in specified situation.

The proposal also clarifies that practicum coursework may not be transferred into a degree program and must always be completed as part of the qualifying degree. These clarifications are intended to preserve the law’s intent of ensuring that qualifying degrees are cohesive programs that prepare students for MFT licensure, while offering reasonable flexibility and consistent outcomes in relatively uncommon situations.

Recommendation

Conduct an open discussion on the language proposed in **Attachment A**. Direct staff to make any discussed changes, and any nonsubstantive changes, and to incorporate the language into the proposed MFT education amendments that the Committee is working on.

Attachment

Attachment A: Additional Section – Definition of Integrated Degree Program and Allowance of Transfer Units

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Attachment A

Additional Section – Definition of Integrated Degree Program and Allowance of Transfer Units

4980.xx Degree Integration and Transfer Units

For the purposes of section 4980.36, a “single, integrated degree” means a graduate program that is designed, delivered, and awarded by one institution as a cohesive course of study. The program shall be structured to meet the educational requirements for licensure as a marriage and family therapist, rather than assembled from unrelated or separately awarded degrees or coursework. The completed qualifying graduate degree shall be reflected on a single transcript which shall total no fewer than 60 semester units or 90 quarter units of graduate-level coursework. Coursework may only be brought from another program under the following limited exceptions:

(a) (1) **School Closure Exception.** Applicants who were enrolled in a qualifying graduate degree program at an institution that is permanently closed may transfer coursework to a new educational institution, provided that:

- A. The receiving institution accepts the transferred coursework as equivalent and integrates it into the qualifying degree program.
- B. The official transcript from the degree-granting institution reflects a completed degree that meets all requirements of subsections (a) through (xx), and that totals no fewer than 60 semester units or 90 quarter units.

There is no limit on the number of transfer units for this exception, however, the required practicum coursework shall not be transferred and must be completed as part of the qualifying degree program from the degree-granting institution.

(2) **Combined Master’s/Doctoral Program Exception.** In the case of formally structured combined master’s and doctoral programs offered by the same institution, the 60 semester-unit or 90 quarter unit requirement may be met across both degrees, provided that:

- A. The degree-granting institution certifies that the coursework meets all requirements of subsections (a) through (xx).
- B. The coursework is part of a continuous, planned program of study in marriage and family therapy or a related mental health field and the applicant provides documentation from the institution verifying the integrated nature of the program.

(3) **Master’s-Level Transfer Credit Exception.** For applicants not qualifying for an exception under paragraphs (1) or (2), no more than 12 semester units or 18 quarter

units of graduate-level coursework may be transferred from another graduate degree program, provided that:

- A. The receiving institution accepts the transferred coursework as equivalent and integrates it into the qualifying degree program.
- B. The official transcript from the degree-granting institution reflects a completed degree that meets all requirements of subsections (a) through (xx), and that totals no fewer than 60 semester units or 90 quarter units.
- C. Practicum coursework shall not be transferred and must be completed as part of the qualifying degree program from the degree-granting institution.

(4) Undergraduate-Level Transfer Credit Exception. The Board shall not accept undergraduate courses as meeting any coursework requirement unless the applicant's official transcript clearly shows that the course was awarded graduate credit by the qualifying degree program. The following limits apply to graduate-level coursework taken as an undergraduate:

A. If the coursework was taken from the same institution that issues the qualifying degree, the board will accept up to 12 semester units or 18 quarter units.

B. If the coursework was taken from an institution other than the one that issues the qualifying degree, the board will accept up to 6 semester units or 9 quarter units.

C. Practicum coursework shall not be transferred and must be completed as part of the qualifying degree program from the degree-granting institution.

(b) Institutional Certification Requirement. In all cases described above, the degree-granting institution shall certify that:

1. The content of the transferred coursework is in marriage and family therapy or in related areas directly supporting the development of the applicant's professional marriage and family, individual, or group therapy skills.

2. The completed degree program meets all educational requirements for licensure as a marriage and family therapist as outlined in subsections (a) through (xx).