

MEMORANDUM

DATE	April 28, 2026
TO	Board Members
FROM	Steve Sodergren, Executive Officer
SUBJECT	AMFTRB Transition Update

Background

This report provides a brief status update on the activities that staff have been conducting to prepare for the possible transition to the Association of Marital and Family Therapy Board's (AMFTRB) National Examination.

The Rulemaking Process

In September 2024, the Board approved proposed statutory amendments that would permit the Board to authorize the adoption of a national examination through regulations. This statutory change became effective on January 1, 2026. Following this, at its August 2025 meeting, the Board approved proposed regulatory amendments that would designate the AMFTRB National Examination as the clinical exam for LMFT licensure in California.

Since then, several developments will require the Board to approve updated regulatory language: a linkage study is being conducted, regulatory amendments to sections related to examinations have been adopted, and the originally proposed start date has been extended to July 1, 2027. The updated regulatory language will be brought to the Board at the August 2026 meeting.

Linkage Study

In 2022, the OPES conducted an independent review and evaluation of the AMFTRB National Examination, including a linkage study evaluating the extent to which the content reflects the description of practice identified in the California 2020 Occupational Analysis. Since that review, AMFTRB updated its examination content based on findings from a 2025 occupational analysis that incorporated input from licensees nationwide, including California LMFT licensees. Accordingly, in December 2025, the Board requested that OPES conduct a new linkage study based upon the updated AMFTRB National Examination content.

California Business and Professions Code section 139 reflects the Legislature's intent that licensure examinations be grounded in occupational analysis and periodically validated

through psychometric evaluation, and that the evaluation be updated when there is a substantial change to and examination. Consistent with that intent, the Board's consideration of transitioning to a national examination is supported by a structured review of exam content, or linkage study, to ensure the AMFTRB National Examination is psychometrically sound and that its use is legally defensible.

Board staff will continue coordination between OPES and AMFTRB to ensure that all questions and concerns are thoroughly addressed and will present the final findings at the August meeting.

Examination Transition

Because there are differences in how the CA LMFT Examination and the AMFTRB National Examination are administered, it is critical that the candidates understand these distinctions and that the Board and AMFTRB work collaboratively to minimize disruption for candidates. Board staff has been working closely with AMFTRB to address the key differences between the Board's LMFT Examinations and the AMFTRB National MFT Examination. (Attachment A)

The Board requires candidates to complete both a Clinical Examination and a Law and Ethics Examination, which are administered year-round via Pearson. In contrast, AMFTRB administers a single national examination through the Professional Testing Corporation (PTC) during monthly testing windows. The examinations also differ in cost structures, scheduling processes, retake policies, and score-reporting timelines. Portability also varies significantly and reflects one of the most substantive differences between the two examinations. The Board examinations are valid solely within California, whereas the AMFTRB examination is recognized in 49 states and territories.

The California Law and Ethics Examination will remain a state-specific requirement and will not be part of the clinical examination consideration with AMFTRB.

Both organizations provide ADA/disability accommodation. The Board additionally offers English as a Second Language (ESL) accommodation, while AMFTRB provides English Language Learner (ELL) accommodation. Both ESL and ELL are designed to support candidates who may require language-related assistance.

AMFTRB continues to evaluate and refine its examination processes, and the Board is actively collaborating with AMFTRB to address and mitigate any issues that may arise. In addition, the Board continues its outreach efforts with the California Association of Marriage and Family Therapists (CAMFT) to discuss and better understand potential concerns raised by its members.

Attachments

Attachment A: CA LMFT Clinical and AMFTRB National Exam Comparison

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

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

Attachment A: Comparison of CA LMFT Clinical and AMFTR National Exam

Topic	BBS LMFT Examinations	AMFTRB National MFT Examination
Administering Authority	Via Pearson Professional Assessments (Pearson)	Via Professional Testing Corporation
Exam Components	Clinical Exam and Law & Ethics Exam	Single National MFT Exam
Cost	\$375 (\$250 Clinical / \$150 L&E)	\$370
Scheduling	Year-round schedule via Pearson	Set monthly testing windows
Retake Policy	90-day waiting period; must retake within 1 year of a failed attempt	One exam per calendar quarter upon Board approval; must retake within 1 year of a failed attempt
Format & Duration	Computer-based 4 hours / 150 questions	Computer-based 4 hours / 180 questions
Portability	Valid only in California	Accepted in 49 states and territories
Score Reports	Pass/Fail score report provided at exam completion	Scores issued within 20 business days after testing period ends
Accommodations	Accommodation available (ADA & ESL)	Accommodation available (ADA & ELL)
<i>ESL/ELL – Both refer to candidates who may require language-related accommodations</i>		

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April 23, 2026

Wendy Strack, Chair
Board of Behavioral Sciences
1625 North Market Blvd., Suite S-200
Sacramento, CA 95834

RE: Continued Strong Support for BBS Adoption of the AMFTRB National Exam

Dear Chairperson Strack and Board Members:

On behalf of the 39,000 members of The California Association of Marriage and Family Therapists (CAMFT), we wish to express our continued strong support for the Board of Behavioral Sciences (BBS) adoption of the Association of Marital and Family Therapy Regulatory Board (AMFTRB) national exam as California's clinical exam for MFT licensure.

Executive Summary

CAMFT strongly urges the BBS to initiate regulatory rulemaking to formally adopt the AMFTRB national exam for MFT licensure in California. The transition would:

Modernize Licensure and Align with National Standards. Aligns California with the 49 states and territories using the AMFTRB national exam.

Improve Portability and Expand Federal Employment Opportunities. Supports interstate license portability and improves access to federal positions requiring nationally standardized qualifications.

Maintain California's Influence in National Exam. Preserves California's role in shaping national exam content through participation in AMFTRB processes.

Strengthen Exam Validity. Utilizes a nationally developed, competency-based exam with established test development standards and ongoing quality review.

Reduce Bias and Support Equity. Leverages large-scale demographic and performance data to identify disparities and support continuous improvement in exam fairness.

Focus BBS Resources on Core Functions. Enables BBS to prioritize resources for licensure processing, enforcement, and consumer protection by eliminating the need to maintain a California-specific clinical exam.

Recognition of the AMFTRB National Exam in 49 States

The AMFTRB national exam serves as the standard clinical exam in every other state and U.S. territory that regulate the MFT profession throughout the country. California remains the only state that maintains its own clinical exam. Adopting the AMFTRB national exam would align California with national licensure standards and ensure consistency with the broader profession.

Better Fit for a Rapidly Evolving Profession

The MFT profession is growing and changing quickly. The U.S. Bureau of Labor Statistics projects employment of MFTs to grow 13% from 2024 to 2034, significantly faster than the average for all occupations.¹ At the same time, telehealth and digital service delivery are reshaping how care is provided. A recent nationwide poll by the American Psychiatric Association found that nearly four in ten Americans are more open to using telehealth services to meet with a medical or mental health professional.²

As the profession grows and telehealth becomes more widely utilized, license portability and federal recognition become essential to ensure that qualified California MFTs can practice where they are needed most and access expanded career opportunities.

- *License Portability:* Transitioning to the AMFTRB national exam would ease the process of obtaining licensure in multiple states and reduce the need for California-specific exceptions. CAMFT continues to work closely with AAMFT to advance license portability for California MFTs, but we have been seeing other states' hesitation in working with California due to its use of its own clinical exam. Adopting the AMFTRB national exam would help reduce those barriers and improve consistency across state jurisdictions.

- *Federal Opportunities:* Many federal-level job specifications require licensure that meets national standards. For example, the U.S. Department of Veterans Affairs (VA) requires that MFT applicants have passed the AMFTRB national exam to qualify for mid- to high-level and supervisory positions.³ CAMFT has invested significant resources and effort in advocating for special considerations but adopting the AMFTRB national exam would immediately improve national recognition of California licensure, competitiveness in the national workforce, and access to federal systems such as the VA and Department of Defense.

Preserving California Standards

Transitioning the clinical testing component to the AMFTRB national exam does not dilute California-specific standards. The BBS continues to require the Law and Ethics exam, six hours of law and ethics continuing education coursework for license renewal, and three hours of law and ethics continuing education coursework for registrant renewal to ensure applicants and licensees understand state laws, regulations, and ethical obligations. While the testing component may not

¹ <https://www.bls.gov/ooh/community-and-social-service/marriage-and-family-therapists.htm>

² <https://www.psychiatry.org/news-room/news-releases/new-nationwide-poll-shows-an-increased-popularity>

³ https://www.aamft.org/AAMFT/Resources/VA_Jobs.aspx

be derived by a California regulatory agency, oversight of the licensee and consumer protection are still in the hands of the California regulatory body.

California's Active Role in AMFTRB National Exam Development

California MFTs have an established role in shaping the national exam content and incorporating California-practice standards in the exam. This participation occurs through several structured channels and ensures California maintains influence over national exam content:

- *Job Task Analysis (JTA)*: In the last year, AMFTRB conducted a job task analysis survey to gather input from California MFTs regarding the tasks, knowledge, and skills that practitioners use in their daily practice. AMFTRB recognizes that national practice trends are increasingly aligned with California practices, and the survey results will further identify key competencies and content areas to help better align exam content and measurement scope with California practice.
- *Exam Construction*: AMFTRB has a robust exam development process that includes item-writing workshops, review by subject matter experts (SME), oversight by its Exam Advisory Committee, content validation efforts, and post-administration analysis to ensure validity, fairness, and relevance of its content and scope. Both CAMFT and the BBS have roles in the AMFTRB exam development process. CAMFT supports this work by encouraging California MFTs to act as AMFTRB subject matter experts (to participate in exam development activities). The BBS is a member of AMFTRB and can provide input, share feedback, and represent California's perspective in national meetings and committees that help guide exam development. Already, California licensed MFTs have begun acting as SMEs in the development and improvement of the AMFTRB.
- *Content Alignment Collaboration*: AMFTRB has also expressed interest in reviewing the BBS's LMFT written clinical exam question bank to assist them with addressing content concerns and ensuring content alignment with California's practice standards.

Strengthening Exam Fairness

Bias in standardized exams exists and can manifest in different ways. Racial, socioeconomic, and linguistic biases can unfairly disadvantage test takers from diverse backgrounds. The AMFTRB has more resources and technical capacity for assessing bias compared to the BBS and its California-specific exam.

- *Differential Item Function Analysis*: AMFTRB collects voluntary demographic data from exam candidates and uses the data to conduct statistical analyses. This process helps identify if a particular test item is biased against a specific set of test takers. Test items that show significant disparities across racial, socioeconomic, and linguistic groups are reviewed under the exam development process and are either revised or removed from the exam's question bank to ensure fairness. This ongoing demographic analysis will help identify disparities and support continuous exam improvement.

Transparency and Communication in Exam Updates

We also recognize the importance of ensuring that exams meet established testing standards when updating content and the knowledge being assessed. Providing clear, timely, and accessible information is a critical component of maintaining a fair, valid, and transparent exam process. CAMFT stands ready to partner with BBS and AMFTRB to support effective communication and candidate preparation throughout any exam updates or transition. This includes promoting clearly defined exam content outlines, advance notice of changes, and accessible guidance that aligns with California's prioritization of clarity, transparency, and fairness in exam processes.

Expanding AMFTRB National Exam Accessibility

It is essential that there is adequate national exam access for California test takers. AMFTRB has acknowledged that incorporating California applicants will nearly double the number of test takers that the national exam currently serves. CAMFT has proactively engaged with AMFTRB to assess how a larger California candidate pool may drive increases in testing frequency and availability of exam locations to meet this heightened demand.

- *Frequency:* Currently, the national exam is offered one week each month. The limited frequency of the national exam is partly due to exam version changes and the time required to validate exam forms. AMFTRB has noted that receiving BBS's LMFT written clinical exam question bank will help increase their ability to offer more frequent testing opportunities. Additionally, The American Association of Marriage and Family Therapy (AAMFT) has not reported that the current exam frequency is an issue in the other 49 states and territories that use the AMFTRB national exam.
- *Location:* AMFTRB currently administers its national clinical exam at select testing centers, with 17 test sites in California. AMFTRB has expressed interest in reviewing BBS data on exam usage across the state to inform decisions about adding additional testing locations, improving access for individuals living in rural areas of the state.

Focus BBS Resources on Core Mission

Transitioning clinical exam administration to AMFTRB enables BBS to redirect resources from exam development and administration to its core regulatory functions. Other BBS regulated licenses already use national exams successfully and this final exam transition will allow BBS to focus on its primary mission of consumer protection and regulatory oversight.

CAMFT Support for National Exam Transition

CAMFT is committed to supporting the BBS and AMFTRB throughout the transition process. Clear and transparent communication with test takers and other stakeholders will be essential to ensure a smooth switchover between the exams. CAMFT is well positioned and available to assist the BBS and AMFTRB by:

- Communicating key updates and timelines regarding the switchover.
- Collaborating with BBS and AMFTRB to develop comprehensive Q&A documents and other informational resources to address questions about the transition.

- Identifying areas where clarification and guidance will be most useful.

CAMFT has already begun compiling member questions and has developed a FAQ resource to support this transition.⁴

Thank you for your leadership and attention to this very important matter. For the reasons outlined above, **CAMFT strongly urges the BBS to begin rulemaking that would formally adopt the national exam for MFT licensure in California**, and we are available to provide any further assistance or information that the Board may need.

Sincerely,



Cathy Atkins, JD
Deputy Executive Director



Shanti Ezrine, MPA
State Government Affairs Associate

cc: Steve Sodergren, BBS Executive Officer
Marlon McManus, BBS Assistant Executive Officer

⁴ <https://www.camft.org/national-exam>

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April 24, 2026

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

RE: Adoption of the National MFT Exam

Dear Chairperson Strack:

On behalf of the American Association for Marriage and Family Therapy (“AAMFT”), we join with the California Association of Marriage and Family Therapists in strongly supporting the Board’s earlier decision to move forward with adopting the Association of Marital and Family Therapy Regulatory Boards (“AMFTRB”) Marital and Family Therapy National Examination (“AMFTRB National Exam”) as the clinical exam for licensure as a marriage and family therapist in California. By implementing this important change, California will join the other states in recognizing the AMFTRB National Exam as the clinical exam for marriage and family therapy licensure.

We realize that the BBS is planning to move forward with proposed regulations for public comment. AAMFT strongly supports this effort. Adopting the AMFTRB National Exam will align California with the exam requirements found in the remaining states and improve the ability of California marriage and family therapists (“MFTs”) to provide services virtually in other states.

Recognition of the AMFTRB National Exam

The AMFTRB National Exam is recognized in the other 49 states and the District of Columbia as the clinical examination for licensure as an MFT. The AMFTRB National Exam was first given in 1989. The exam was quickly adopted as the standard in states that regulated the MFT profession. Within a few years, the other states that had administered state clinical exams had replaced their own state clinical exams with the AMFTRB National Exam.

Other state licensure boards support the AMFTRB National Exam. The purpose of the AMFTRB National Exam is to assist state licensure boards in determining if applicants for licensure have attained the necessary knowledge and experience for practice as a licensed MFT. The AMFTRB National Exam is designed to assess knowledge through questions focused on the tasks that an early career MFT should be able to perform and the knowledge required to successfully perform those particular tasks. Since 1989, thousands of MFTs have taken and passed this exam, representing almost all MFTs licensed outside of California. The other states have continued to support the AMFTRB National Exam by maintaining this exam as the clinical examination for MFT licensure.

Licensure Portability

We believe that the adoption of the AMFTRB National Exam will greatly facilitate the ability of California MFTs to obtain additional MFT licenses in other states. The ability to legally practice in other states, whether remotely through telehealth practice or by traveling outside California to practice, is very important for most MFTs.

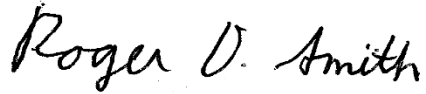
AAMFT has been actively lobbying policymakers in other states through its Access MFTs portability initiative to remove unnecessary barriers to out-of-state MFTs becoming licensed in those states. Over the last two years, 15 states have adopted changes to their portability laws in order to allow MFTs licensed in other states to more easily practice in these 15 states.

However, California MFTs face a unique barrier when seeking licensure in other states. Several states require all applicants for licensure as an MFT to have first passed the AMFTRB National Exam. These states do not provide a method for out-of-state applicants who have only passed the current California exam to become licensed in these states.

These exam restrictions are unnecessary. However, for a variety of reasons, some policymakers in these states do not want to remove these California-specific restrictions. Even a few of the 15 states that recently amended their MFT portability laws declined to remove existing language requiring applicants to pass the AMFTRB National Exam. Adopting the AMFTRB National Exam will ensure that future licensees, who are more likely to be interested in obtaining licenses in other states than established clinicians, will not encounter this California exam barrier when applying for licensure in any other state.

Thank you for your consideration of these comments. AAMFT strongly supports efforts by the BBS to adopt the AMFTRB National Exam as the clinical exam for applicants for MFT licensure in California. Please contact me at rsmith@aamft.org if you have any questions.

Sincerely,



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