Board of Behavioral Sciences

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Gavin Newsom, Governor, State of California | Business and Consumer Services Agency | Department of Consumer Affairs

MEMORANDUM

DATE	November 6, 2026
TO	Board Members
FROM	Steve Sodergren, Executive Officer
SUBJECT	Discussion and Possible Action Regarding the Board's Rulemaking to Accept the Association of Marital and Family Therapy Regulatory Boards' Marital and Family Therapy National Examination as the Clinical Exam for California Licensure as a Marriage and Family Therapist (Title 16 of the California Code of Regulations (16 CCR) §§ 1816.2 and 1829.1)

Background

At its August 22, 2025, meeting, the Board approved proceeding with amendments to the above sections of Title 16, California Code of Regulations (16 CCR) (see Attachment A). This item is being brought back for reconsideration due to the following issues being identified.

The Association of Marital and Family Therapy Regulatory Boards (AMFTRB) completed its job task analysis to inform a new exam outline and content. A new version of the AMFTRB National Examination was published in January 2026, that appeared to align more closely with California's LMFT Clinical Outline. Staff requested OPES perform another analysis of this version, which had not previously been evaluated. Following ongoing discussions with AMFTRB and revisions to the AMFTRB National Examination outline, OPES convened a new panel of SMEs to conduct an additional linkage study. During the 2026 linkage study, OPES not only conducted the linkage analysis but also reviewed an actual exam form, including item content and formatting.

While OPES acknowledges that AMFTRB has made changes to the MFT National Examination that potentially brings it closer to California competency requirements, at this time OPES finds insufficient evidence to establish that the MFT National Examination is an adequate measure of the scope of competencies required for independent LMFT practice in California. OPES recommends that the Board continues its use of the California-specific LMCE for licensure in California at this time. (Attachment B)

Staff Recommendation

Staff recommend rescinding the Board's August 22, 2025, approved motion to initiate a rulemaking to adopt the AMFTRB's Marital and Family Therapy National examination for California licensure as set forth in Attachment A, and direct staff to place LMFT licensure portability to other jurisdictions on the agenda for a future Board meeting. Additionally, after reviewing the proposed language, then direct staff to incorporate any discussed

revisions, and authorize publication of the notice entitled “Board Decision Regarding the AMFTRB National Examination for California LMFT Licensure” (Attachment C).

Discussion

Discuss adoption of the AMFTRB examination for licensure and consider possible Board action, including the “possible actions” options listed below or another option as determined by the Board.

Possible Actions

- **Take no action:** Staff will continue the regulatory process to accept the AMFTRB’s National Examination for California licensure.

- **Place the rulemaking “on hold” pending further work with AMFTRB:** Rescind the Board’s August 22, 2025, approved motion to initiate the rulemaking using the text provided in Attachment A and direct staff to place all further rulemaking preparation activities “on hold” while OPES continues to work with the AMFTRB to address identified issues.

- **Rescind approval:** Rescind the Board’s August 22, 2025, approved motion initiating a rulemaking to adopt the AMFTRB Marital and Family Therapy National examination for California licensure through amendments proposed in Attachment A.

- **Rescind approval and consider portability:** Rescind the Board’s August 22, 2025, approved motion to initiate a rulemaking to adopt the AMFTRB’s Marital and Family Therapy National examination for California licensure as set forth in Attachment A, and direct staff to place LMFT licensure portability to other jurisdictions on the agenda for a future Board meeting.

Attachments

Attachment A: Proposed Regulatory Language for Title 16, Division 18, California Code of Regulations Sections 1816.2 and 1829.1 (LMFT National Clinical Exam)

Attachment B: OPES’s Memo dated November 5, 2026, to the Board’s Executive Officer Regarding Findings and Recommendation Regarding the Marital and Family Therapy National Examination

Attachment C: Board Decision Regarding the AMFTRB National Examination for California LMFT Licensure

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

PROPOSED REGULATORY LANGUAGE
Title 16, Division 18, California Code of Regulations
Sections 1816.2 and 1829.1.

Proposed amendments to the regulatory language are shown in single underline for text to be added and ~~single strikethrough~~ for text to be deleted.

AMEND SECTIONS 1816.2 and 1829.1 IN TITLE 16 OF DIVISION 18 OF THE CALIFORNIA CODE OF REGULATIONS TO READ AS FOLLOWS:

§ 1816.2. Examination Fees.

(a) The licensed clinical social worker California law and ethics examination fee shall be one hundred fifty dollars ($150).

(b) The licensed marriage and family therapist California law and ethics examination fee shall be one hundred fifty dollars ($150).

~~(c) The board administered licensed marriage and family therapist clinical examination fee shall be two hundred fifty dollars ($250).~~

~~(d)~~(c) The licensed educational psychologist written examination fee shall be two hundred fifty dollars ($250).

~~(e)~~(d) The licensed professional clinical counselor California law and ethics examination shall be one hundred fifty dollars ($150).

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

§ 1829.1. Required Examinations.

(a) The written examinations shall test for minimum acceptable competency to practice marriage and family therapy without causing harm to the public health, safety or welfare, and shall consist of the following:

(1) A California law and ethics examination designed to assess the applicant's knowledge of and ability to apply legal and ethical standards relating to the practice of marriage and family therapy.

(2) A clinical examination designed to assess an applicant's knowledge of psychotherapeutic principles and methods in treatment and their application, and the ability to make judgments about appropriate techniques, methods and objectives as applicable to the marriage and family therapist scope of practice.

(b) Until December 31, 2026, ~~T~~the clinical examination as described in subsection (a)(2) shall be a board administered examination.

(c) Effective on or after January 1, 2027, the clinical examination described in subsection (a)(2) shall be the Association of Marital and Family Therapy Regulatory Board's (AMFTRB) Marital and Family Therapy National Examination.

Note: Authority cited: Sections 4980.397, 4980.40 and 4980.60, Business and Professions Code. Reference: Sections 4980.397, 4980.40, 4980.398, 4980.399 and 4980.50, Business and Professions Code.

CALIFORNIA DEPARTMENT OF CONSUMER AFFAIRS

BUSINESS and CONSUMER SERVICES AGENCY • GAVIN NEWSOM, GOVERNOR

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MEMORANDUM

DATE	November 5, 2026
TO	Steve Sodergren, Executive Officer California Board of Behavioral Sciences
FROM	Amy Welch Gandy Amy Welch Gandy, PhD, Chief Office of Professional Examination Services
SUBJECT	Findings and Recommendation Regarding the Marital and Family Therapy National Examination

As mandated by Business and Professions Code (BPC) section 139, and Department of Consumer Affairs (DCA) Policy *OPES 22-01 Licensure Examination Validation Policy*, all licensure examinations must demonstrate validity and meet accepted professional guidelines and technical standards. This mandate applies to both state-specific and national examinations. According to policy, failure to establish this validation evidence jeopardizes the fairness and legal defensibility of examination programs.

To comply with this mandate, the Board of Behavioral Sciences (Board) requested that the Office of Professional Examination Services (OPES) conduct a psychometric review and linkage study of the Association of Marital and Family Therapy Regulatory Boards' (AMFTRB) Marital and Family Therapy National Examination (MFT National Examination) to determine whether the MFT National Examination was suitable for measuring competencies required for safe and effective Licensed Marriage and Family Therapy (LMFT) practice in California. This review was completed in 2022, and the results were provided to the Board in closed session on November 3, 2022.

During the Board's open session on November 4, 2022, OPES discussed its general findings and its August 1, 2022, memo regarding the AMFTRB examination review (https://www.bbs.ca.gov/pdf/agen_notice/2022/20221103_04_item_xvi.pdf). As reported in the memo, there were noteworthy differences between the MFT National Examination and the California LMFT Written Clinical Examination—national examinations tend to test broad competencies related to practice, whereas state examinations test competencies specific to practice within California. At the Board meeting, the Board ultimately declined to use the AMFTRBG clinical exam for California licensure and directed staff to continue working with OPES to address all

concerns raised in closed session and additional concerns during the Board's discussion (https://www.bbs.ca.gov/pdf/board_minutes/2022/20221103.pdf).

In 2026, the Board requested that OPES conduct a second linkage study to determine whether changes made by AMFTRB adequately addressed concerns identified in the original psychometric review and linkage study. OPES also performed additional subsequent analyses related to the California LMFT Written Clinical Examination (LMCE) and the MFT National Examination. Results of the comprehensive review were provided to the Board during closed session in August 2026.

OPES recognizes the benefit of exploring options for entry into the LMFT profession and increasing portability and OPES commends the Board for considering acceptance of the MFT National Examination for licensure in California. However, the significance of the LMFT profession in California, the unique make-up of California's diverse residents and their mental health needs, and the range of practice settings in which LMFTs practice in California warrant careful evaluation of any changes in the licensure examination process to ensure that it remains an adequate measure of minimum competence specific to practice in California.

While OPES acknowledges that AMFTRB has made changes to the MFT National Examination that potentially bring it closer to California competency requirements, at this time OPES finds insufficient evidence to establish that the MFT National Examination is an adequate measure of the scope of competencies required for independent LMFT practice in California. OPES recommends that the Board continues its use of the California-specific LMCE for licensure in California at this time.

OPES remains available to assist the Board and will continue to review development processes and provide recommendations in accordance with BPC section 139 to ensure that any examination considered for use in California meets psychometric standards and provides an adequate measure of the competencies required for practice.

Attachment C: Board Decision Regarding the AMFTRB National Examination for California LMFT Licensure

The Board of Behavioral Sciences is committed to ensuring that all licensing examinations used in California measure the full range of knowledge, skills, and abilities necessary for safe, competent, and culturally responsive practice in California. After extensive evaluation and careful consideration, the Board has decided not to move forward at this time with regulations that would adopt the Association of Marital and Family Therapy Regulatory Boards' (AMFTRB) National Marital and Family Therapy Examination as the clinical examination for LMFT licensure in California.

Over the past several years, the Board has collaborated with examination experts, subject matter experts, and stakeholders to assess whether the AMFTRB National examination meets California's statutory requirements for licensure examinations and reflects the unique needs of communities served by LMFTs in our state. OPES conducted multiple psychometric reviews and linkage studies to evaluate exam content, clinical applicability, and alignment with California's occupational analysis.

These reviews found that, while the national exam measures broad competencies used across many jurisdictions, it does not yet sufficiently assess key elements essential to California practice, including cultural awareness and diversity and community-based and public mental health practice.

Because examinations must be legally defensible, psychometrically valid, and grounded in a current occupational analysis as required by Business and Professions Code section 139—the Board determined that proceeding with regulatory adoption would be premature at this time.

We recognize the importance of license portability and the value of nationwide consistency; however, consumer protection and the assurance of minimum competence for California practice must remain our guiding priorities. We would also like to extend our appreciation to the staff of AMFTRB for their effort and working with us over the last few years.