



Board of Behavioral Sciences



1625 North Market Blvd., Suite S-200
Sacramento, CA 95834
(916) 574-7830
www.bbs.ca.gov

Gavin Newsom, Governor
State of California

Business, Consumer Services and Housing Agency
Department of Consumer Affairs

POLICY AND ADVOCACY COMMITTEE MINUTES

A recorded webcast of this meeting is available at [Policy & Advocacy Meeting 7.31.25](#).

DATE July 31, 2025

TIME 9:00 a.m.

LOCATIONS

Primary Location Department of Consumer Affairs
1747 North Market Blvd., #182
Sacramento, CA 95834

Alternative Platform WebEx Video/Phone Conference

ATTENDEES

Members Present at Remote Locations

Christopher Jones, Chair, LEP Member
Kelly Ranasinghe, Public Member
John Sovec, LMFT Member
Wendy Strack, Public Member

Staff Present at Primary Location

Steve Sodergren, Executive Officer
Marlon McManus, Assistant Executive Officer
Christy Berger, Regulatory Manager
Rosanne Helms, Legislative Manager
Christina Kitamura, Administrative Analyst
Kristy Schieldge, Legal Counsel
Syreeta Risso, Special Projects and Research Analyst

Staff Present at Remote Locations

Sabina Knight, Legal Counsel

Other Attendees

Public participation via WebEx video conference/phone conference
and in-person at Department of Consumer Affairs

1. Call to Order and Establishment of Quorum

Christopher Jones, Chair of the Policy & Advocacy Committee (Committee), called the meeting to order at 9:01 a.m. Roll was called, and a quorum was established.

2. Introductions

Committee members introduced themselves during role call; staff and public attendees introduced themselves.

3. Consent Calendar

a. Discussion and Possible Approval of August 9, 2024 Committee Meeting Minutes

b. Discussion and Possible Approval of January 24, 2025 Committee Meeting Minutes

Motion: Approve the August 9, 2024 and January 24, 2025 Policy and Advocacy Committee meeting minutes.

M/S: Sovec/Strack

Public Comment: None

Motion carried: 4 yea, 0 nay

Member	Vote
Christopher Jones	Yes
Kelly Ranasinghe	Yes
John Sovec	Yes
Wendy Strack	Yes

4. Discussion and Possible Recommendation to Initiate a Rulemaking to Amend the Board's Experience Requirements for Licensed Educational Psychologists (Title 16 of the California Code of Regulations (16 CCR) §1856)

In January and August 2024, the Policy and Advocacy Committee reviewed possible changes to licensing requirements for LEPs. The Committee provided feedback and direction on proposed legislation and regulations. Since that time, previously discussed statutory changes have been placed in Senate Bill (SB) 775, which is pending review in the Legislature.

Staff presented proposed regulation amendments if SB 775 is enacted. This proposal was provided as Attachment A in the meeting materials.

Staff also presented proposed statutory amendments to LEP licensure requirements pending via SB 775. This proposal was provided as Attachment B in the meeting materials.

Requirements for LEP licensure:

- 60 semester hours of postgraduate work in pupil personnel services; and
- Two years of full-time or equivalent experience as a credentialed school psychologist; and
- One of the following:
 - One year of supervised professional experience in an accredited school psychology program; or
 - One additional year of full-time or equivalent experience as a credentialed school psychologist in the public school under the direction of an LEP.

Pending Statutory Amendments (Attachment B)

a. Specifying Experience Requirements in Greater Detail

- Replace the current measurement of experience in “years” to instead be measured in “school terms.”
- Provide a definition of “full time” and “equivalent to full time.”
- Specifying that all required experience as a credentialed school psychologist be gained over a period of at least one or two school terms.
- Specifying that all required experience as a credentialed school psychologist be no more than 6 years old prior to filing the application for licensure.
- Clarifying that supervised professional experience in an accredited school psychology program must be 1,200 hours.
- Clarifies that for California credential holders, the one school term of additional experience must be under the direction of a LEP with a California license.

b. Clarifying Requirements for In-State Versus Out-of-State School Psychologists

Specifies that if the required two school terms of experience as a credentialed school psychologist was not gained with a California credential in a school located in California, that an additional one school term of experience must be gained with a California credential in a school located in California and under the direction of a California-licensed LEP.

c. Adding an Age Limit to a Passing Score on the LEP Exam.

Proposed Amendments to Regulation (16 CCR §1856) (Attachment A)

The following proposed changes to LEP experience requirements in 16 CCR §1856 will be run after related statutory changes are enacted into law.

1. Strike language that would be covered by statute as follows:
 - Delete subsection (a) which specifies that no more than one year of experience will be granted for any 12-month period.
 - Delete subsection (b) which specifies requirements pertaining to part-time experience.
2. Specify documentation required for experience gained in a private or parochial school (subsection (a)):

Proposed language would require a supervisor or authorized school representative to certify, under penalty of perjury, that the applicant performed the full range of school psychologist duties as defined by the Commission on Teacher Credentialing (CTC) regulations in Title 5, CCR § 80049.1(a)(3).

3. Specify documentation required for experience gained while employed by a temporary employment agency (subsection (b)):

Proposed language would require a supervisor or authorized school representative to certify, under penalty of perjury, that the applicant performed the full range of school psychologist duties as defined by the CTC regulations in Title 5, CCR § 80049.1(a)(3).

4. Specify the documentation of experience required to be submitted by applicants:

The proposal adds subsections (c), (d), and (e) to specify the minimum documentation needed to verify completion of experience required for licensure.

5. Specify additional requirements for experience gained under the direction of an LEP:
 - Subsection (e)(1) defines “under the direction of” and “supervision” to clarify expectations.
 - Subsection (e)(2) requires supervisors to hold a current, active, and unrestricted California LEP license and prohibits specified conflicts of interest.
 - Subsection (e)(3) would require the supervisor to be competent in the areas of practice and techniques being supervised and would provide a definition for “competent.”

Discussion

The Committee discussed supervision requirements for LEPs. Currently, there is no formal supervision training required for LEPs supervising credentialed school psychologists. Differences between LEP and other licensure supervision models were noted. Members and staff agreed it may be worth revisiting supervision regulations in the future.

Motion: Recommend to the Board approval of the proposed regulatory text in Attachment A and recommend the Board consider all of the following actions:

- (1) After enactment of SB 775, direct staff to submit the text in Attachment A to the Director of the Department of Consumer Affairs and the Business, Consumer Services, and Housing Agency for review and if no adverse comments are received, authorize the Executive Officer to take all steps necessary to initiate the rulemaking process, make any non-substantive changes to the package, and set the matter for a hearing if requested.
- (2) If no adverse comments are received during the 45-day comment period and no hearing is requested, authorize the Executive Officer to take all steps necessary to complete the rulemaking and adopt the proposed regulations as noticed for Title 16, California Code of Regulations section 1856.

M/S: Jones/Strack

Public Comment: None

Motion carried: 4 yea, 0 nay

Member	Vote
Christopher Jones	Yes
Kelly Ranasinghe	Yes
John Sovec	Yes
Wendy Strack	Yes

- 5. Discussion and Possible Recommendations Regarding Restructuring the Pathway to Licensure for Licensed Marriage and Family Therapists, Licensed Clinical Social Workers, and Licensed Professional Clinical Counselors (Business and Professions Code (BPC) §§4980.397, 4980.398, 4980.399, 4980.40, 4980.41, 4980.43, 4980.50, 4984.01, 4984.7, 4984.72, 4989.20, 4989.68, 4992.05, 4992.07, 4992.09, 4992.1, 4996.1, 4996.3, 4996.4, 4996.23, 4996.28, 4999.46, 4999.46.1, 4999.50, 4999.52, 4999.53, 4999.55, 4999.64, 4999.100, 4999.120)**

At previous meetings, the Workforce Development Committee considered several potential modifications to the licensure process aimed at reducing barriers to entry.

The Board's licensing and examination statutes are complex, and any amendments must be carefully evaluated to prevent unintended consequences and ensure effective implementation. Staff recommends a phased approach to implementing changes to the licensure and examination process.

- Phase I would involve amendments to the licensing and examination framework.
- Phase II would implement the transition to the Association of Marital and Family Therapy Regulatory Boards (AMFTRB) national exam as the clinical exam for Licensed Marriage and Family Therapists (LMFTs).
- Phase III would adjust the timing of the Board's clinical examinations to allow candidates to take those exams earlier in the licensure process.

A summary of the proposed phases is provided in Attachments B, C, and D:

The Committee's discussion focused on Phase I changes provided as Attachments A-1 through A-4 in the meeting materials.

Phase I: General Licensing Process Changes: LMFT, LCSW and LPCC

The following changes are proposed to take place in Phase I and have been drafted into the LMFT, LCSW, and LPCC practice acts.

a. Timing of the California Law and Ethics Exam

This proposal would allow associates to choose when they take the California law and ethics exam.

Under this proposal, associates would take the exam when they are ready rather than annually for registration renewal. The exam must still be passed before a subsequent registration number is issued, and before eligibility to take the clinical exam is granted. This change would help avoid renewal delays if the exam is missed in a given year.

b. Age Limit for the California Law and Ethics Exam

This proposal places an age limit of 7 years on a passing score for the California Law and Ethics Exam.

c. Change in Registration Number Length and Time Supervised Experience Hours Valid

This proposal extends the extend the validity of registration numbers and supervised experience hours from 6 years to 7 years.

d. Add an Exception to the Prohibition on Working in a Private Practice with a Subsequent Registration Number

Under the proposal, the law would continue to prohibit associates with a subsequent associate registration number from working for a private practice or professional corporation. However, it would allow a one-time, two-year hardship extension for associates with a subsequent registration number to work in these settings.

e. Technical Clean-Up Changes

The proposal makes minor, technical clean-up changes:

- Deleting outdated exam transition and rescoring provisions
- Removing the 7-year retake requirement for the law and ethics exam
- Clarifying acceptance of early clinical exam scores from other states
- Removing repetitive language in statute
- Clarifying when eligibility is granted for the law and ethics exam

Phase I for LEPs

The following changes are proposed to take place in Phase I for LEPs:

- This proposal extends the time limit on qualifying experience hours to 7 years.
- Technical clean-up to delete outdated exam rescoring fee.

Need for Regulations

If the proposed statutory amendments are successfully adopted, corresponding regulatory changes will be required to ensure consistency with the statute.

Discussion

The Committee discussed clarifying language around the hardship extension process for associates with a subsequent registration number. Members suggested revising the language to include both starting and continuing work. The goal is to support continuity of care while ensuring Board approval is obtained before work begins or continues.

The discussion language in the proposal "[Work for the employer shall not commence until the extension is approved by the board.](#)" was changed to:

Work for the employer shall not commence or continue until the extension is approved by the board. (BPC §§ 4984.01(e)(3), 4996.28(d)(3), 4999.100 (e)(3))

Motion: Direct staff to make the discussed changes to BPC §§ 4984.01, 4996.28, and 4999.100 and any nonsubstantive changes to the language, and to bring to the Board for consideration as a legislative proposal.

M/S: Sovec/Jones

Public Comment

Shanti Ezrine, (CAMFT): CAMFT continues to support the changes to the licensing process. 1) BPC 4984.01 – thanked staff for adding the one-time hardship extension language. Noted that additional language that offers the applicant options to select commencement of the two-year extension would be helpful. 2) Minor technical clean-up amendment that allows the Board to accept a passing clinical score from another state – since corresponding regulatory changes will be required, CAMFT requests that it be included in the regulations that explicitly clarifies that point.

Dr. Ben Caldwell: Encouraged the Committee to move this to the full board. Requested that the Committee consider aligning the implementation dates for removing the law and ethics exam retake requirement and the new seven-year exam validity rule to avoid confusion and ensure consistency.

Helms responded that while the retake requirement would be removed immediately, the seven-year limit begins in 2030. Any inconsistencies are expected to resolve over time, and aligning the timelines was not seen as necessary due to the limited impact.

Bindu Mukkamal, National Association of Social Workers, California Division (NASW-CA): Requested the Committee to consider offering a 30-day waiver for applicants that are receiving an extension for the subsequent registration number.

Dr. Jasmine Smith, NASW-CA: Noted concerns about potential service disruptions when associates apply for a subsequent registration number, especially for high-risk clients. Asked the Committee to consider a temporary allowance similar to the 30-day waiver used for out-of-state providers. Additional comments included support for allowing social work interns to count certain pre-degree hours toward licensure, similar to MFTs.

Helms summarized suggestions on the table and provided feedback:

- Clarifying language regarding the start of the two-year extension - Staff will work with stakeholders regarding this suggestion, although staff is unsure whether that language will be necessary.

- Timing of law and ethics exam - No changes are recommended to the law and ethics exam timing; concerns about timing conflicts are minimal.
- 30-day waiver for associates awaiting a subsequent registration number – This was discussed but not recommended due to potential confusion and existing safeguards.
- Ability for applicants to choose a start date for the one-time extension - The application process will include guidance on requesting the one-time extension, with flexibility for applicants to choose a start date.
- Social work interns counting pre-degree hours towards licensure - This will be explored in future Workforce Development Committee meetings.

Motion carried: 4 yea, 0 nay

Member	Vote
Christopher Jones	Yes
Kelly Ranasinghe	Yes
John Sovec	Yes
Wendy Strack	Yes

6. Discussion and Possible Recommendations Regarding Statutory Amendments Related to the Practice of Pastoral Counseling (Amend BPC §§4980.01, 4996.13, 4999.22)

The topic of pastoral counseling was discussed at the Licensing Committee meeting in January 2023 to clarify exemption language in the Board's practice acts. Staff presented research and examples of exemption laws in other states, which was provided as Attachment B in the meeting materials.

Staff collaborated with Subject Matter Experts (SMEs) to conduct further research on the topic. The research included reviewing and distinguishing practice methods used in pastoral counseling and in mental health professions. Key findings highlighted the distinction between faith-based counseling and licensed mental health practice.

Staff and SMEs researched additional exemption laws in other states, provided as Attachment C. Research findings were shared at the January 2025 Policy and Advocacy Committee meeting.

Next Steps

Staff began drafting amendments using BPC §4996.13 as a model due to its detailed language. After consulting with SMEs and legal counsel, it was determined that proposed amendments should focus on faith-based counseling rather than pastoral counseling. The proposed language should establish clear criteria distinguishing faith-based counseling from clinical mental health

counseling. The goal of the proposed amendments is to provide key differentiating factors for individuals serving in a faith-based capacity:

- The services and activities performed are under the direct auspices of the faith-based entity, such as church, synagogue, mosque, or other recognized religious organization;
- Fees beyond the religious official's customary compensation from the faith-based entity are not charged or received;
- They do not state or imply they are licensed or registered to practice clinical social work, and they do not hold themselves out to the public by any title or description of services incorporating the words psychosocial or clinical social worker; and
- The services provided by the individual are limited to counseling services in a religious or spiritual context, not involving the diagnosis or treatment of mental health disorders.

Discussion

Ranasinghe: Expressed concern about individuals using titles such as "pastoral counselor" or "Christian counselor" to avoid licensure requirements while still charging for services. Noted that the proposed regulatory changes appear to address this issue by including language that prohibits charging or receiving any fee beyond the customary fee provided to the faith-based entity.

Strack: Asked what the recourse is for pastoral counselors charging for counseling services.

Sodergren responded that the Board can issue a citation and fine of \$5,000 and proceed from there.

Helms: Revisited the terminology used in section 4996.13(b), specifically the phrase "pastoral or professional duties." There was uncertainty about whether this wording is appropriate or inclusive enough. It was suggested that "pastoral" may imply Christian counseling and might not encompass all relevant roles. The group was asked to discuss whether alternative wording would be more suitable.

After brief discussion, the language remained as proposed.

Motion: Direct staff to make any discussed changes to add the LEP licensure and the Nursing Practice Act licensure to subdivision (a) of each proposed sections being amended, to strike "pastoral or" in subdivision (b) in each of the proposed sections being amended, make any nonsubstantive changes, and bring to the Policy and Advocacy Committee as consideration as a legislative proposal.

M/S: Jones/Ranasinghe

Public Comments

Shanti Ezrine, CAMFT: CAMFT supports the clarifying language for those individuals providing faith-based counseling services to ensure adequate consumer protection. Proposed language in Attachment A-2 looks good. Suggested including the word “psychotherapy” in addition to the word “psychosocial” that is already in the language as a description of services that they shall not state or imply.

Cathy Atkins, CAMFT: Suggested that professional associations could play a role in providing educational resources to clarify the implications of the change and help explain what the changes mean and who they affect.

Further Discussion

Berger: Raised a question regarding the language in the provision stating that services are limited to counseling provided in a religious or spiritual context and do not involve the diagnosis or treatment of mental health disorders; asked if the term "mental health disorders" is sufficient.

Ranasinghe: Referring to Mr. Ezrine’s suggestion, questioned whether the word “psychotherapy” is too broad.

A brief discussion took place about adding the word “psychotherapy.”

Amended Motion:

To direct staff to make the discussed changes to:

- 1) Add the LEP licensure and the Nursing Practice Act licensure to sections 4996.13(a), 4980.01(a), and 4999.22(a);
- 2) Strike “pastoral or” in 4996.13(b), 4980.01(b), and 4999.22(c);
- 3) Add “psychotherapy” in sections 4996.13(b)(3), 4980.01(b)(3), 4999.22(c)(3);

And make any nonsubstantive changes and bring to the Policy and Advocacy Committee as consideration as a legislative proposal.

M/S: Strack/Ranasinghe

Public Comment

Shanti Ezrine, CAMFT: Thanked staff for considering CAMFT’s suggested language.

Motion carried: 3 yea, 0 nay, 1 abstention

Member	Vote
Christopher Jones	Yes
Kelly Ranasinghe	Yes
John Sovec	Abstain
Wendy Strack	Yes

7. Discussion and Possible Recommendation Regarding Senate Bill 775 Amendments (Ashby) (BPC §§:4980.11, 4996.16.1, 4999.23)

In 2023, the Board sponsored AB 232, allowing out-of-state therapists to treat existing clients in California for up to 30 days. A sunset date of January 1, 2026, was included to allow for future review.

At its September 2024 meeting, the Board agreed to extend the sunset date to January 1, 2030, to allow more time for data collection. This extension is included in SB 775.

As part of the Board's 2025 sunset review, the Senate Committee on Business, Professions and Economic Development, and the Assembly Committee on Business and Professions requested an additional amendment be added to the temporary practice allowance statute in SB 775 (BPC §§ 4980.11, 4996.16.1, and 4999.23). The following amendment would strengthen accountability of the out-of-state licensee providing services to a client temporarily located in California, by requiring them to submit a signed statement, under penalty of perjury, acknowledging the Board's jurisdiction and agreeing to comply with California law:

(c) A person who provides services pursuant to this section ~~is deemed to have agreed to practicing under~~ *shall submit a signed statement, under penalty of perjury, acknowledging that they are subject to* the jurisdiction of the board and *agreeing* to be bound by the laws of this state.

Motion: Recommend to the Board take a "support" position on the amendments to BPC §§ 4980.11, 4996.16.1, and 4999.23.

M/S: Sovec/Jones

Public Comment

Shanti Ezrine, (CAMFT): CAMFT has no concerns regarding the additional amendments and will continue to support SB 775.

Motion carried: 4 yea, 0 nay

Member	Vote
Christopher Jones	Yes
Kelly Ranasinghe	Yes
John Sovec	Yes
Wendy Strack	Yes

8. **Update on Board-Sponsored and Board-Monitored Legislation:**

A full update on board-sponsored and board-monitored legislation was provided in the meeting materials. Ms. Helms provided a brief status update on the following bills:

Board-Sponsored Legislation

- SB 775 (Ashby) Board of Psychology and Board of Behavioral Sciences: SB 775 is currently in the Assembly Appropriations Committee.
- AB 489 (Bonta) Health Care Professions: Deceptive Terms or Letters: Artificial Intelligence: AB 489 is in the Senate Appropriations Committee.

Board-Opposed Legislation

- AB 427 (Jackson) Social Workers: Interstate Compact: AB 427 is a 2-year bill.

9. **Update on Board Rulemaking Proposals**

Disciplinary Guidelines: Submitted for DCA final phase review July 9, 2025

Telehealth: Submitted to the Office of Administrative Law for final approval on July 8, 2025

Continuing Education: Submitted for DCA Production Phase Review April 8, 2025; Staff Working on Requested Edits to Documents

Advertising: Comment period ended July 1, 2025; comments to be reviewed by the Board at its August 2025 meeting

English as a Second Language: In preparation for DCA production phase review

Fee Regulations: In concept phase; staff is working with DCA and will be drafting proposed language soon.

10. **Suggestions for Future Agenda Items**

None

11. Public Comment for Items no on the Agenda

Sovec: Acknowledged staff for their continued efforts in using gender-neutral language throughout public-facing documents. The attention was noted and appreciated, with specific recognition of recent updates in the language presented today.

12. Adjournment

The Committee adjourned at 11:16 a.m.