

December 27, 2025

Tomiquia Moss, Secretary
California Business, Consumer Services and Housing Agency
500 Capitol Mall, Suite 1850
Sacramento, CA 95814

Dear Secretary Tomiquia Moss,

In accordance with the State Leadership Accountability Act (Leadership Accountability), the Board of Behavioral Sciences submits this report on the review of our internal control and monitoring systems for the biennial period ending December 31, 2025.

Should you have any questions please contact Marc Mason, Administrative Manager, at (279) 895-6066, Marc.Mason@dca.ca.gov.

GOVERNANCE

Mission and Strategic Plan

The mission of the Board of Behavioral Sciences (Board) is to protect and serve Californians by setting, communicating, and enforcing standards for safe and competent mental health practice.

GOAL 1: LICENSING Establish licensing standards to protect consumers and allow reasonable and timely access to the profession.

- 1.1 Streamline the application process with online submission to decrease processing times.
- 1.2 Collaborate with the Department of Consumer Affairs' Organizational Improvement Office to review the application process and implement improvements to reduce processing times.
- 1.3 Partner with other agencies and stakeholder groups to reduce barriers to licensure and foster the development of a diverse and culturally responsive mental health workforce.
- 1.4 Increase communication to applicants and licensees to reduce common application or licensing maintenance errors.
- 1.5 Develop video presentations to increase understanding of the licensing process and the pathways to licensure.

GOAL 2: EXAMINATION Administer fair, valid, comprehensive, and relevant licensing examinations.

- 2.1 Identify and implement strategies to increase diversity of subject matter experts to ensure that examinations are culturally responsive and address diverse populations.
 - 2.2 Improve the examination process to ensure timely and equitable access to licensure.
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2.3 Review, report, and determine feasibility of adopting the use of the Association of Marital and Family Therapists Regulatory Boards (AMFTRB) national exam for the Licensed Marriage and Family Therapist (LMFT) Clinical exam.

GOAL 3: ENFORCEMENT Protect the health and safety of consumers through the enforcement of laws.

3.1 Develop and implement an effective communication process from open to close of a case to ensure applicants, complainants, and respondents are better informed about the status of their case.

3.2 Educate licensees, associates, and consumers about the enforcement process to increase awareness of the Board's enforcement role and responsibilities.

3.3 Complete review and make recommendations on the Board's existing enforcement statutes and regulations for clarity, cohesiveness, and equity.

3.4 Evaluate and establish internal policies and procedures related to enforcement issues to ensure an equitable process that reflects rehabilitation versus punitive measures for the purpose of consumer protection.

3.5 Create diversity in the pool of qualified enforcement Subject Matter Experts to ensure equitable enforcement proceedings.

GOAL 4: LEGISLATION AND REGULATION Ensure the statutes, regulations, policies, and procedures strengthen the Board's mandate and mission.

4.1 Implement statutes and regulations that comprehensively address telehealth and educate stakeholders, licensees, and consumers about telehealth.

4.2 Review current licensing requirements regarding registration, exam, and supervised experience timeframes and make recommendations for possible amendments to current statutes and regulations.

4.3 Review and update statutes and regulations related to additional coursework requirements for associates and the Continuing Education Unit requirements for licensees.

4.4 Modernize and clarify statutes and regulations related to advertising to ensure they keep up with current advertisement practices.

GOAL 5: ORGANIZATIONAL EFFECTIVENESS Build an excellent organization through proper Board governance, effective leadership, and responsible management.

5.1 Review current organizational structure to ensure efficient operations and to foster upward career mobility among staff.

5.2 Collaborate with the Department of Consumer Affairs' Organizational Improvement Office to review internal processes and implement improvements to better serve the stakeholders and the Board.

5.3 Advance transition to reduce the use of paper documents to promote environmental friendliness, reduce costs, and reduce processing times.

5.4 Formalize a communications plan that will ensure quicker responses to emerging concerns from stakeholders.

GOAL 6: OUTREACH AND EDUCATION Engage stakeholders through continuous communication about the practice and regulation of the professions, and mental health care.

6.1 Create a more robust consumer and licensing education program through videos, social media campaigns, and electronic publications to ensure understanding of new changes in laws and regulations.

6.2 Collaborate with entities that work with consumers to increase equitable and inclusive outreach to diverse populations.

6.3 Increase Board engagement with schools, training programs, public events, and relevant professional organizations to raise awareness of the Board's role and activities.

6.4 Identify and implement strategies to gain increased participation in Board meetings from a wider group of stakeholders.

Control Environment

At the Board, management is expected to demonstrate good practices through their own habits, integrity and ethical values. Oversight of the Board's Executive Officer (EO) is provided by the Board. The Executive Officer provides oversight of the Assistant Executive Officer (AEO). Both the Executive Officer and the Assistant Executive Officer provide oversight to the Staff Services Managers who in turn oversee the staff. Each staff member has clearly defined expectations for their role as detailed in their duty statement.

All Board staff are required to read and sign the Board's Office Guidelines, which detail the Board's values and rules of conduct.

Management follows state Human Resources probation guidelines to evaluate staff performance and enforce accountability for new employees. Once a staff member passes probation, Management uses Individual Development Plans to identify areas of improvement and possible training opportunities. The Board regularly utilizes a variety of training offered through the Department of Consumer Affairs' SOLID Training Unit.

Information and Communication

The Board employs one Associate Governmental Program Analyst (AGPA) who is responsible for evaluating and maintaining the Board's operational budget. This analyst communicates with the Board's units about budgetary needs and serves as a liaison between the Board and Department of Consumer Affairs' Budget Office.

The Board employs one AGPA responsible in part for maintaining an active presence on social media and sending e-mail blasts through Listserv. This analyst regularly updates stakeholders through the Board's Facebook page with licensing timelines, public notices, and Board news.

Board managers (Staff Services Managers I) hold regular meetings with employees where employees are encouraged to identify and report on inefficiencies and problems in their respective units. All managers are expected to always maintain an "open door" policy as well. In addition to these unit-specific meetings, the EO and AEO hold weekly managers meetings and one-on-ones where managers are asked to report on any issues, problems, or inefficiencies.

On a quarterly basis, Board staff proactively engages with the Board at Board Meetings to provide comprehensive updates on its operational, programmatic, and financial aspects. These meetings are broadcast via webcast to allow for better accessibility and stakeholder engagement.

MONITORING

The information included here discusses the entity-wide, continuous process to ensure internal control systems are working as intended. The role of the executive monitoring sponsor includes facilitating and verifying that the Board of Behavioral Sciences monitoring practices are implemented and functioning. The responsibilities as the executive monitoring sponsor(s) have been given to: Marlon McManus, Asst. Executive Officer; Steve Sodergren, Executive Officer.

Board management routinely meets one-on-one with staff to identify programmatic problems, which enables management to respond to vulnerabilities. Management performs ongoing reviews of completed staff work. The Board conducts an annual evaluation of the Executive Officer's performance, which reflects on the program's overall performance.

The Board periodically undergoes comprehensive review of operations by external entities, such as the Department of Consumer Affairs, California State Auditor, and the Legislature (Sunset Review). Program assessment is routine and ongoing, providing sufficient opportunity for program improvement as vulnerabilities are identified. As vulnerabilities are identified, appropriate staff are assigned to address the vulnerability. Responses may include revising control procedures, implementing new controls, or modifying existing processes to address the vulnerabilities. When significant vulnerabilities are discovered, corrective action plans are developed.

RISK ASSESSMENT PROCESS

The following personnel were involved in the Board of Behavioral Sciences risk assessment process: executive management, middle management, front line management, and staff.

The following methods were used to identify risks: brainstorming meetings, ongoing monitoring activities, audit/review results, other/prior risk assessments, external stakeholders, consideration of potential fraud, and performance metrics.

The following criteria were used to rank risks: likelihood of occurrence, potential impact to mission/goals/objectives, timing of potential event, and tolerance level for the type of risk.

RISKS AND CONTROLS

Risk: Structural Fiscal Imbalance

An external audit of the Board's fees and operational costs completed in 2019 indicated that the Board's fees needed to be raised to prevent insolvency. In 2021, fee increases were implemented at the recommendation of the audit. Following the increase, the Board amassed a large reserve fund. The Board's revenue collection now outpaces expenditures and has resulted in a structural imbalance.

Control: Temporary Fee Decrease

At its May 2025 Board Meeting, the Board voted to direct staff to implement a temporary fee reduction for fiscal years 2026-2030. Proposed changes to the regulations to implement the temporary fee reductions were noticed to the public in September 2025. This four-year period will allow the Board to reexamine the current fee structure and address whether the fee structure needs to be amended before the temporary reduction is over.

Risk: Staff—Recruitment, Retention, Staffing Levels

Through efforts to increase the licensed population of mental health professionals in California, the workload for the licensing and registration units has continued to grow. The Board has addressed the increased workload through hiring temporary staff, but this is unsustainable. Limited term staff often apply for the stability of permanent roles. Frequent refilling of these temporary positions has resulted in decreased processing times, limited outreach, and delays in responding to inquiries as the new staff are frequently in training or in recruitment.

Control: Cross-Training and Reorganization

The Board will continue to cross-train analysts and evaluators within these units to share the workload. Board management and staff are working in conjunction with the Department of Consumer Affairs' Office of Human Resources to address a reorganization of the Board's structure and possible reclassifications.

Risk: Resource Strain for In-Person Board Meetings

The Board holds quarterly in-person Board meetings. Depending on the physical location chosen for the Board meeting, the Board may accrue significant costs for travel, lodging, venue rental, and set-up. The Board is limited from holding Board meetings solely via online means by the 2024 Bagley-Keene Open Meeting Act's (Act) alternative teleconference rules. Per the Act, a majority of state body members must be physically present at the same teleconference location. If a majority is not physically present at the same location, a public meeting cannot be held.

Control: Virtual Meetings

The Board will continue to provide services through online means when available such as in the case of informational sessions, school outreach presentations, and committee meetings. The Board will support the Department of Consumer Affairs in any efforts to transition Board meetings or other services to Webex or other approved online formats.

Risk: Emerging Technology and Treatment Modalities

The Board is aware of emerging trends in the training and practice of mental health professionals such as artificial intelligence and psychedelic-assisted care. These modalities may have potential to negatively impact licensees and consumers. For example, artificial intelligence is a moderately newer technology in the field which is currently being utilized by Board licensees to document, train, and research. While there are benefits to this technology, unregulated use may result in ethical dilemmas such as breaches in confidentiality or biased assessments and diagnoses. It is important that the Board stay informed of changes in the field and be prepared to set, communicate, and enforce standards for safe and competent mental health practice.

Control: Publications – Newsletters, Outreach, Webinars

The Board will continue to research topics as they arise and inform licensees of best practices on the use of these modalities via newsletters and outreach webinars. The Board will publish documents to inform consumers of their rights and how best to protect themselves and navigate a constantly adapting field. If a source of consumer harm by licensees using a new treatment type is identified, the Board will pursue regulatory changes to best safeguard consumer protection.

Risk: Significant Paper Files

While the Board continues to process physical documents, any event that causes the Board's physical files to become inaccessible would cause an interruption to Board business operations. Staff would be unable to access certain licensing, registration, continuing education, or enforcement files. Additionally, a reliance on paper documents and dependence on the mail system extends wait times for licensing and registration services.

Control: Transfer Applications Online

Complaints and renewals have already been moved online, and the Board is working to transition applications for registration and licensure online as well. A crucial aspect of this strategy is the migration of essential functions to online platforms, alongside the discontinuation of paper-based versions. This transition will ensure Board staff has access to all needed applications and forms regardless of staff location and provides a failsafe if Board staff were to lose access to the physical office. As an added benefit, the transfer of documents by stakeholders to the Board would become instantaneous, and applicants would receive responses from the Board in a timelier manner.

Risk: Key Person Dependence – Procedures Documentation

The Board employs several staff members with unique roles, without other employees cross-trained as back-up. As a result, the Board may face a gap in essential services if those employees choose to promote, take extended leave, or retire.

Control: Procedures Documentation

Each Board unit has an established process and procedures document, but there is not one central repository to store and reference these. The Board needs to establish a formalized procedure for amending the process and procedure manuals. The Board also needs to take inventory of the available documents and assign staff to create written procedures for any missing tasks or roles.

CONCLUSION

The Board of Behavioral Sciences strives to reduce the risks inherent in our work and accepts the responsibility to continuously improve by addressing newly recognized risks and revising risk mitigation strategies as appropriate. I certify our internal control and monitoring systems are adequate to identify and address current and potential risks facing the organization.

Steve Sodergren

Steve Sodergren, Executive Officer

CC: California Legislature [Senate, Assembly]
California State Auditor
California State Library
California State Controller
Director of California Department of Finance
Secretary of California Government Operations Agency