



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2015-187A

Eric Ashmore, Executive Director
State Board of Behavioral Health Licensure
3815 N. Santa Fe Ave., Ste. 110
Oklahoma City, Oklahoma 73118

December 9, 2015

Dear Executive Director Ashmore:

This office has received your request for a written Attorney General Opinion regarding agency actions that the State Board of Behavioral Health Licensure intends to take. The proposed actions are to declare incomplete the applications for Licensed Marital and Family Therapist licenses of Lisa Xing, Jessica Osborn, and Ansley Watkins for lacking sufficient coursework to qualify for a license. The first lacked sufficient courses in marital and family systems theory and human development; the second lacked sufficient coursework in marital and family systems theory and treatment in marital and family therapy; the last lacked sufficient coursework in marital and family systems theory, human development, and professional studies.

The Marital and Family Therapist Licensure Act, 59 O.S.2011 & Supp.2015, §§ 1925.1–1925.18, provides that applicants for licensure as Licensed Professional Counselors must complete a “master’s degree or a doctorate degree in marital and family therapy, or a content-equivalent degree,” 59 O.S.Supp.2015, § 1925.6(C)(1). The Board’s administrative rules clarify that such a degree must include courses in marital and family systems theory; treatment in marital and family therapy; human development; professional studies; research; and an internship or practicum. OAC 86:15-5-3(b)(1)–(6). The action is intended to enforce these requirements that ensure professionals who seek to practice marital and family counseling under the auspices of a state license have adequate academic credentials. Declaring the applications incomplete and allowing the applicants to finish out the required coursework is a reasonable course of action on the Board’s part.

It is, therefore, the official opinion of the Attorney General that the State Board of Behavioral Health Licensure has adequate support for the conclusion that these actions advance the State of Oklahoma’s policy to protect the public health and welfare by requiring licensed counselors to have adequate qualifications.

A handwritten signature in black ink that reads "E. Scott Pruitt".

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA