



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2015-186A

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 of some twenty-four Licensed Professional Counselor applicants, listed in Appendix A along with specific deficiencies in coursework, for lacking sufficient coursework to qualify for a license.

The Licensed Professional Counselors Act, 59 O.S.2011 & Supp.2015, §§ 1901–1920, provides that applicants for licensure as Licensed Professional Counselors must complete a “master’s degree in a counseling field” with at least sixty graduate semester hours in “counseling-related course work,” 59 O.S.Supp.2015, § 1906(C)(1). The Board’s administrative rules clarify that counseling-related coursework must include at least one course in human growth and development; at least one course in dysfunctional human behavior; at two courses in client assessment techniques; at least one course in professional ethics; at least one course in research; a practicum or internship; and at least five courses of at least three semester hours each from a list of counseling-related fields. OAC 86:10-9-2(a)(1)–(8). The applicant must also have completed enough other coursework to reach sixty graduate semester hours. OAC 86:10-9-2(b). The action is intended to enforce these requirements that ensure professionals who seek to practice 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

**ATTORNEY GENERAL OPINION
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APPENDIX A**

1. Chrystal Brassfield
Insufficient three-hour courses from knowledge areas listed in OAC 86:10-9-2(a)(8)

2. Nineka Dyson
Insufficient courses in core areas listed in OAC 10-9-2(a), including human growth and development, client appraisal and assessment, and research

Insufficient three-hour courses from knowledge areas listed in OAC 86:10-9-2(a)(8)

3. Gabriel Dominguez
Insufficient courses in core areas listed in OAC 10-9-2(a), including human growth and development, client appraisal and assessment, and professional ethics

Insufficient three-hour courses from knowledge areas listed in OAC 86:10-9-2(a)(8)

Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)

4. Sascha Webb
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment

Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)

5. Amy Bowen
Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)

6. Paul Owen
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment

Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)
7. Jeffrey Stewart
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly research

Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)
8. Haley Thompson
Insufficient courses in core areas listed in OAC 10-9-2(a), including client appraisal and assessment as well as counseling theories and methods
9. Amanda Underwood
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment
10. Ann Gleason
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment
11. Adrian King
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment

Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)
12. Erica Davis
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment
13. Kevin Williams
Insufficient courses in core areas listed in OAC 10-9-2(a), including client appraisal and assessment as well as research

14. Charlotte Williams
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment
15. April Crawford
Insufficient courses in core areas listed in OAC 10-9-2(a), including human growth and development as well as dysfunctional human behavior
16. Mary Lawrence
Insufficient courses in core areas listed in OAC 10-9-2(a), including dysfunctional human behavior as well as client appraisal and assessment
17. Kevin Sonntag
Insufficient courses in core areas listed in OAC 10-9-2(a), including dysfunctional human behavior, client appraisal and assessment techniques, counseling theories and methods
- Insufficient three-hour courses from knowledge areas listed in OAC 86:10-9-2(a)(8)
- Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)
18. Anna Phifer
Insufficient courses in core areas listed in OAC 10-9-2(a), including human growth and development, dysfunctional human behavior, client appraisal and assessment, and professional ethics
- Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)
19. Kelsey Smith
Insufficient courses in core areas listed in OAC 10-9-2(a), including human growth and development, client appraisal and assessment, and research

20. Douglas Lormand
Insufficient coursework to reach sixty graduate semester hours of counseling-related courses per OAC 86:10-9-1(a)
21. Tayler Hall
Insufficient courses in core areas listed in OAC 10-9-2(a), particularly client appraisal and assessment
22. Brenda Kay Kinnison
Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)
23. Jacqueline Reynolds Long
Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)One additional course in any knowledge area listed in OAC 86:10-9-2(a)
24. Gail Renee Cato-Strong
Insufficient courses in core areas listed in OAC 10-9-2(a), including client appraisal and assessment as well as professional ethics