



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2015-184A

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 deny two requests by Licensed Professional Counselor applicants, Cathy Wahkinney and Clarissa Webb, to reduce the supervised experience requirement because of graduate coursework.

The Licensed Professional Counselors Act, 59 O.S.2011 & Supp.2015, §§ 1901–1920, provides that applicants for licensure as Licensed Professional Counselors must complete “[t]hree (3) years of supervised full-time experience in professional counseling,” 59 O.S.Supp.2015, § 1906(C)(2). The Act also provides, however, that graduate coursework can be substituted for up to two years of supervised experience at the rate of thirty graduate semester hours per one year of supervised experience. *Id.* Qualifying graduate coursework must be “beyond the master’s degree, provided that such hours are clearly related to the field of counseling and are acceptable to the Board.” *Id.* Here, neither applicant presented sufficient graduate coursework beyond the master’s degree—which requires sixty graduate semester hours in counseling-related coursework, *id.* § 1906(C)(1)—and the Board thus denied requests to reduce the supervised experience requirement. This action is intended to apply a straightforward statutory framework.

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 experience and qualifications.

A handwritten signature in black ink, appearing to read "E. Scott Pruitt".

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA