



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2015-188A

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 action that the State Board of Behavioral Health Licensure intends to take. The proposed action is to deny the application of Trina Johnson for licensure as a Licensed Marital and Family Therapist. The applicant's degree lacks most of the requirements for a degree in marriage and family counseling, including theoretical courses in marital and family systems; therapy in the marital and family context; human development; and professional ethics.

The Marital and Family Therapist Licensure Act, 59 O.S.2011 & Supp.2015, §§ 1925.1–1925.18, requires that an applicant for a license as a Licensed Marital and Family Therapist obtain “[a] master’s degree or a doctoral degree in marital and family therapy, or a content-equivalent degree as defined by the Board,” 59 O.S.Supp.2015, § 1925.6(C)(1). The Board’s administrative rules include several requirements for a degree in marital and family therapy or a content-equivalent degree, including that the degree have three courses in theoretical marital and family systems; three courses in therapy in the marital and family context; three courses in human development; a course in ethics and professional studies; a course in research; and a practicum or internship. OAC 86:15-5-3(b)(1)–(6). This action is intended to advance the statutory policy that applicants for licensure as a marital and family therapist have an actual academic background in marital and family therapy. The Board may reasonably believe that the dearth of coursework in relevant areas in the applicant’s transcript belies applicant’s qualifications.

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 this action advances the State of Oklahoma’s policy to require academic qualifications of licensed counseling professionals.


E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA