



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2016-1A

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

January 7, 2016

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 the requests of Licensed Professional Counselors Shawn Brue and Stacey Reynolds to use the title "doctor." Neither applicant has a doctoral degree from a regionally accredited college or university.

The Licensed Professional Counselors Act, 59 O.S.2011 & Supp.2015, §§ 1901–1920, authorizes the Board to "[a]dopt and establish rules of professional conduct," 59 O.S.Supp.2015, § 1905(A)(2). The Board's rules clarify that Licensed Professional Counselors "may use the doctoral degree and the title 'Doctor' in advertising, practice and status as a counselor[] if the doctoral degree is in counseling . . . and if the degree was granted by a regionally accredited college or university." OAC 86:10-3-5(c). This action enforces this straightforward requirement by barring licensees from advertising to the public as "doctors" when they do not have doctoral degrees from accredited educational institutions.

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, safety, and welfare.

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

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA