



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2016-21A

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 declare incomplete the applications for licensure as Licensed Marital and Family Therapists of applicants #0013 and #0014 for lacking sufficient coursework to qualify for a license. Each applicant lacked sufficient courses from areas listed in OAC 86:15-5-3(b)(1)-(6); applicant #0013 lacked theoretical foundations in marital and family systems as well as ethics and professional studies, while applicant #0014 lacked theoretical foundations in marital and family systems, assessment and treatment, and human development.

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, appearing to read "Scott Pruitt", with a stylized flourish at the end.

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

