



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2016-20A

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 Professional Counselors of some twelve 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 least 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, appearing to read "E. Scott Pruitt".

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA

7. Applicant #0007
 - Insufficient courses in core areas listed in OAC 86:10-9-2(a), particularly appraisal and assessment
 - 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)
8. Applicant #0008
 - Insufficient courses in core areas listed in OAC 86:10-9-2(a), particularly human growth and development, professional orientation and ethics, and an internship or practicum
 - 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)
9. Applicant #0009
 - Insufficient courses in core areas listed in OAC 86:10-9-2(a), particularly abnormal human behavior as well as appraisal and assessment
10. Applicant #0010
 - Insufficient courses in core areas listed in OAC 86:10-9-2(a), particularly human growth and development as well as appraisal and assessment
11. Applicant #0011
 - Insufficient courses in core areas listed in OAC 86:10-9-2(a), particularly abnormal human behavior as well as appraisal and assessment
 - Insufficient coursework to reach sixty graduate semester hours from knowledge areas listed in OAC 86:10-9-2(a)

12. Applicant #0012

Insufficient courses in core areas listed in OAC 86:10-9-2(a), particularly human growth and development, appraisal and assessment, and professional orientation and ethics

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