



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

**ATTORNEY GENERAL OPINION
2016-301A**

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

May 19, 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 action is to declare incomplete the application for licensure as a Licensed Professional Counselor of applicants #0036 and #0037 for lacking sufficient coursework to qualify for a license. Applicant #0036 lacked sufficient coursework in abnormal human behavior, assessment techniques, and professional ethics; applicant #0037 lacked a course in assessment techniques.

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 two courses in counseling methods; 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". The signature is written in a cursive, flowing style with a large initial "E".

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA