



OFFICE OF ATTORNEY GENERAL
STATE OF OKLAHOMA

ATTORNEY GENERAL OPINION
2015-185A

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 actions that the State Board of Behavioral Health Licensure intends to take. The proposed actions are to declare several degree programs in Oklahoma not content equivalent for qualifying for licensure as a Licensed Professional Counselor or Licensed Marital and Family Therapist. The degrees being declared not content equivalent for Licensed Professional Counselor licensure are the University of Oklahoma's Ph.D. in Special Education; the University of Central Oklahoma's Master of Arts in Substance Abuse Studies; and the University of Central Oklahoma's Master of Arts in Family and Child Studies - Family Life Education. The degrees being declared not content equivalent for Licensed Marital and Family Therapist licensure are the Oklahoma State University Master of Science in Family Relations and Child Development as well as the University of Oklahoma Master of Human Relations in Human Relations.

The Licensed Professional Counselors Act, 59 O.S.2011 & Supp.2015, §§ 1901–1920, requires that an applicant have a “at least sixty (60) graduate semester hours . . . of counseling-related course work. These sixty (60) hours shall include at least a master’s degree in a counseling field,” 59 O.S.Supp.2015, §1906(C)(1). Likewise, the Marital and Family Therapist Licensure Act, 59 O.S.2011 & Supp.2015, §§ 1925.1–1925.18, requires 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 may believe that, upon the purpose of the above-mentioned degrees and the coursework required to obtain them, they do not qualify for licensure in the respective professions.

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 "E. Scott Pruitt".

E. SCOTT PRUITT
ATTORNEY GENERAL OF OKLAHOMA