



HOW DO LMFTs STACK UP EDUCATION, SUPERVISED EXPERIENCE AND EXAMINATION

It is common for Licensed Marriage and Family Therapists (LMFT) to be challenged about their credentials and qualifications for independent practice as mental health professionals and psychotherapists. In a highly competitive and changing health care environment, professional groups are often jockeying for position and are apt to cast aspersions on other licensed practitioners. Some may still be unfamiliar with the Licensed Marriage and Family Therapist profession in California, even though LMFTs have been licensed in California for approximately forty-seven years.

This article will explore and compare the licensing laws and regulations of the Licensed Marriage and Family Therapist profession, the Licensed Clinical Social Worker (LCSW) profession, the Licensed Professional Clinical Counselor (LPCC) profession, and the Psychologist profession. Psychiatrists have intentionally not been included in this comparison because the educational and experiential requirements are not easily comparable. Psychiatrists are first educated, trained, tested and licensed as physicians, and such comparisons are beyond the scope and intent of this article. This article is not intended to attack or demean any profession, nor is it intended to escalate LMFTs beyond their appropriate place amongst the healing arts professions. It is intended, however, to describe the key requirements for licensure in each of the four mental health professions.

It is important to remember that licensing laws are passed to assure that the public health, safety and welfare is protected by setting minimum standards, and that licensing alone does not determine which therapists are effective and helpful, and which are marginal or dangerous. Consumers, purchasers, insurers, employers and others should look at a variety of factors when selecting mental health professionals, and should not rely solely upon the license held. New efforts in the emerging health care delivery system to measure quality, effectiveness and value may prove helpful in this regard.

Licensed Marriage and Family Therapists are licensed by the Board of Behavioral Sciences, as are Licensed Clinical Social Workers and Licensed Professional Clinical Counselors. Psychologists are licensed by the Board of Psychology. Both licensing boards are within the Department of Consumer Affairs and all four licensing laws are found within Division 2 (Healing Arts Division) of the Business and Professions Code. The MFT, CSW, and PCC licensing laws require a master's degree, while the Psychologist licensing law requires a doctorate degree. The MFT, CSW, and Psychologist licensing laws require approximately the same amount of supervised experience, and all three currently require passage of two examinations prior to licensure. The PCC licensing law requires passage of national exams, or national exams plus one or more Board-developed exams, or just one or more Board-developed exams.

I. Education

A. Licensed Marriage and Family Therapist

The MFT licensing law, specifically Section 4980.36 of the Business and Professions Code, specifies that qualifying degree programs must, among other things,

1. Provide an integrated course of study that trains students generally in the diagnosis, assessment, prognosis, and treatment of mental disorders;
2. Prepare students to be familiar with the broad range of matters that may arise within marriage and family relationships;
3. Train students specifically in the application of marriage and family relationship counseling principles and methods;
4. Teach students a variety of effective psychotherapeutic techniques and modalities that may be utilized to improve, restore, or maintain healthy individual, couple and family relationships.

The applicant's educational institution must submit to the Board a certification that the applicant has fulfilled the above-mentioned, as well as other requirements. Such other requirements include, but are not limited to, a named doctor's or master's degree in marriage, family, and child counseling, marriage and family therapy, psychology, clinical psychology, counseling psychology, or counseling with an emphasis in either marriage, family, and child counseling or marriage and family therapy, obtained from a school, college, or university accredited by a regional accrediting agency recognized by the United States Department of Education or approved by the Bureau for Private Postsecondary and Vocational Education or accredited by either the Commission on the Accreditation of Marriage and Family Therapy Education or a regional accrediting agency recognized by the United States Department of Education. The degree program must contain at least 60 semester or 90 quarter units of instruction, with no less than 12 semester or 18 quarter units of coursework in "theories, principles, and methods of a variety of psychotherapeutic orientations directly related to marriage and family therapy and marital and family systems approaches to treatment and how these theories can be applied therapeutically with individuals, couples, families, adults, including elder adults, children, adolescents, and groups to improve, restore, or maintain healthy relationships." (Cal. Bus. & Prof. Code §4980.36(d).)

The law carefully articulates what a degree program must contain, but also allows some room for program flexibility. It should be apparent that the educational requirements for licensure as an MFT are substantial and quite relevant to the practice of psychotherapy. Undeniably, the focus of the education is on psychotherapy in general, and marriage and family therapy in particular. The law requires the degree program to include the following areas of instruction, but is not limited to: diagnosis, assessment, prognosis, and treatment of mental disorders, including severe mental disorders; evidence-based practices; psychological testing; psychopharmacology; and promising mental health practices that are evaluated in peer reviewed literature; developmental issues from infancy to old age; multicultural development and cross-cultural interaction; law and ethics, including licensing law and processes; human sexuality; spousal abuse; effects of trauma;

poverty and deprivation; co-occurring mental health and substance use disorders; resilience; and the impact of personal and social insecurity. The degree program is also required to infuse culture and norms of public mental health work and principles of the Mental Health Services Act throughout the MFT curriculum, which includes recovery- oriented care, greater emphasis on culture, and greater understanding of the impact of socioeconomic position. Additionally, the curriculum is required to include instruction in areas necessary for practice in public mental health environments. The curriculum must also include a six semester or nine quarter units of supervised practicum that involves a minimum of 225 hours of face-to-face experience counseling individuals, couples, families, or groups. Up to 75 of those hours may be gained performing client centered advocacy. (Cal. Bus. & Prof. Code §4980.36(d).)

B. Licensed Clinical Social Workers

The Clinical Social Worker licensing law, particularly Section 4996.18 of the Business and Professions Code, requires that applicants for the license possess a master's degree from institutions accredited by the Commission on Accreditation of the Council on Social Work Education. Aside from the mandated coursework in substance abuse detection and treatment, human sexuality; child abuse assessment and reporting; spousal abuse; and aging and long term care; the Clinical Social Worker licensing law does not specify course content. Schools of social work have complete control over course content, as determined and controlled by the Commission on Accreditation of the Council on Social Work Education.

A social work program curriculum usually includes, but is not limited to the following courses: social work practice; social policy and services; research; social welfare; human behavior and environment; and field study. For instance, the curriculum for the Master's in Social Work program at California State University, Fullerton, consists of courses in the following content areas for the first year: social work values and ethics; diversity; populations-at-risk, and social and economic justice; human behavior and the social environment; social welfare policy and services; social work practice; research; and field education. The second year courses prepare students for professional social work practice in the areas of child welfare or community mental health. Students are also expected to complete internship hours under supervision.

C. Licensed Professional Clinical Counselors

The Professional Clinical Counselor licensing law, particularly Section 4999.32 of the Business and Professions Code, requires an applicant for licensure to possess a master's or doctoral degree that is counseling or psychotherapy in content obtained from an accredited or approved institution. The degree must contain not less than 48 graduate semester or 72 graduate quarter units of instruction, which should include three semester units or four and one-half quarter units of graduate study in nine core content areas, including but not limited to, counseling and psychotherapeutic theories and techniques; career development theories and techniques; group counseling theories and techniques; assessment, appraisal, and testing of individuals; and law and ethics. Furthermore, a minimum of 12 semester units or 18 quarter units of advanced coursework to develop knowledge of specific treatment issues; special populations; application of counseling constructs; assessment and treatment planning; clinical interventions; therapeutic

relationships; psychopathology; or other clinical topics is required. Additionally, not less than six semester units or nine quarter units of supervised practicum or field study is required as part of the degree program, which must include a minimum of 150 hours of face-to-face supervised clinical experience counseling individuals, families, or groups.

Furthermore, an applicant must complete the following coursework prior to registration as a PCC intern: alcoholism and other chemical substance abuse dependency; human sexuality; psychopharmacology; spousal or partner abuse assessment; child abuse assessment; law and ethics; aging and long-term care; and crisis or trauma counseling. (Cal. Bus. & Prof. Code § 4999.32.)

D. Psychologists

The Psychologist licensing law, particularly Section 2914 of the Business and Professions Code, provides that individuals meet the educational requirements for licensure if they possess one of the following earned degrees from an approved or accredited educational institution: 1) a doctorate degree in psychology; 2) a doctorate degree in educational psychology; 3) a doctorate degree in education with a field of specialization in counseling psychology, or education with a field of specialization in educational psychology. The required degree, as also specified in the MFT Licensing Law, may be obtained from an accredited institution or from an institution that is approved by the Bureau for Private Postsecondary and Vocational Education. An applicant for licensure trained in an educational institution outside the United States or Canada must demonstrate to the satisfaction of the Board that he or she possesses a doctorate degree in psychology that is equivalent to a degree earned from a regionally accredited university in the United States or Canada. These applicants must provide the Board with a comprehensive evaluation of the degree performed by a foreign credential evaluation service that is a member of the National Association of Credential Evaluation Services and any other documentation the Board deems necessary.

A Psychology program curriculum typically includes, but is not limited to the following courses: clinical interventions; law and ethics; psychopharmacology; statistics; clinical interventions; social psychology; psychological testing and assessment; psychopathology; neuropsychology; independent study; supervised practicum; and a dissertation. The California School of Professional Psychology at Alliant, for instance, expects its students to develop competency in seven areas: interpersonal/relationship; general assessment, appraisal, and ascertainment; multifaceted multimodal intervention; research and evaluation; consultation/teaching; management/supervision; and quality assurance.

Psychologists, like LMFTs, LCSWs and LPCCs, must also complete legislatively mandated coursework or training in substance abuse detection and treatment; child abuse assessment and reporting; human sexuality; spousal abuse; and aging and long-term care. (Cal. Bus. & Prof. Code § 2914.)

II. Supervised Experience

A. Licensed Marriage and Family Therapists

The Marriage and Family Therapist licensing law, specifically Section 4980.40 of the Business and Professions Code, requires at least two years' experience in interpersonal relationships; marriage and family therapy; and psychotherapy. Section 4980.43 further defines this requirement by specifying that two calendar years of supervised experience is required, consisting of at least 3,000 hours obtained over a period of not less than 104 weeks. Experience must be gained within the six years immediately preceding the date the application for licensure is filed, except that up to 500 hours of clinical experience gained in the required practicum is exempt from this "six-year rule."

Experience may be gained only when the applicant is employed or volunteering in a setting that lawfully and regularly provides mental health counseling or psychotherapy such as: a governmental entity; a school, college or university; a licensed health facility, a nonprofit and charitable corporation; or a private practice. A private practice setting is defined as employment by an LMFT, an LCSW, a licensed Psychologist, a Psychiatrist, or a professional corporation of any of the licensed professions. Only individuals who have received their qualifying master's degree and are registered as interns may work in a private practice setting. An applicant must have a minimum of 104 weeks of supervised experience and may claim up to five hours of supervision in any week. Applicants must keep weekly logs of all hours of experience gained, and may claim no more than a total of 40 hours of experience in any one week. (Cal. Bus. & Prof. Code § 4980.43.)

The supervised work experience breaks down into the following categories: direct counseling work experience (minimum 1,500 hours); individual therapy/counseling (no minimum or maximum); group therapy or counseling (maximum 500 hours); telemedicine (telephone or Internet) counseling (maximum 375 hours); administering and evaluating psychological tests, writing clinical reports, writing progress or process notes (maximum 250 hours); and non-counseling work experience (maximum 1,250 hours), which are broken down into the following categories: workshops, seminars, training sessions, or conferences (maximum 250 hours); personal psychotherapy received (maximum 100 x 3= 300 hours); client centered advocacy; and supervision (individual and group). (Cal. Bus. & Prof. Code § 4980.43.)

With respect to supervision, Section 4980.03 of the Business and Professions Code specifies that applicants for the MFT license must be supervised by an LMFT, an LCSW, a licensed Psychologist, or a Physician certified in psychiatry by the American Board of Psychiatry and Neurology. Each of these supervisors must meet additional criteria. The regulations provide that the supervisor must be licensed in California for at least two years prior to commencing any supervision, that his/her license must be in good standing (i.e., his/her license is not on probation or suspension), and that he/she must have practiced psychotherapy or supervised trainees, interns or associate clinical social workers for at least two years within the five year period immediately preceding any supervision.

The supervisor is required to provide at least one hour of individual or two hours of group supervision in each week where any qualifying experience is gained. The regulations require a

five to one ratio for counseling/psychotherapy hours of experience gained by trainees, and one unit (one individual or two group hours) of supervision for the first ten client hours and another unit of supervision for any additional hour above ten in a week gained by registered interns. Applicants for the license must have at least 52 hours of individual supervision (gained in at least 52 separate weeks). The remainder of supervision may be either individual or group. Supervision may not be obtained from one's spouse or relative, nor may it be obtained from a former therapist or from someone with whom the applicant has a personal relationship which undermines the authority or effectiveness of the supervisor. Interns who work in an exempt setting may receive supervision via videoconferencing. Applicants are required to have their supervisor sign a Supervisor Responsibility Statement before commencing employment or supervision (16 C.C.R § 1833.1.)

The Supervisor Responsibility Statement is intended to make supervisors and supervisees aware of the responsibilities the supervisor has to the supervisees and the licensing board. Additionally, the regulation requires supervisors to take reasonable steps to ensure that a supervisee properly assesses and examines the patient, implements an appropriate treatment plan, and is acting both within the scope of his/her license and competence. The supervisor is required to monitor the quality of counseling/psychotherapy performed by direct observation, audio or video recording, review of progress and process notes or records, or by any other means deemed appropriate by the supervisor.

B. Licensed Clinical Social Workers

The Clinical Social Worker licensing law, in Section 4996.2 of the Business and Professions Code, requires two years of supervised post-graduate experience. Section 4996.23 further defines this requirement by specifying that the applicant must have at least 3,200 hours of experience, which must be completed within a minimum of two years, in providing clinical social work services consisting of psychosocial diagnosis, assessment, treatment (including psychotherapy and counseling), client-centered advocacy, consultation and evaluation. The experience specified must be gained in not less than two years and shall have been gained within the six years immediately preceding the date on which the application for licensure is filed.

CSW students and post-graduate applicants, prior to registration, may work at governmental entities, schools, colleges or universities, nonprofit and charitable corporations and licensed health facilities. Only Registered Associate Clinical Social Workers (ASW) may work in private practice settings, such as practices owned by LCSWs, LMFTs, Psychologists, and Psychiatrists. All required supervised experience must be accrued by the applicant while registered with the Board as an ASW. (Cal. Bus. & Prof. Code § 4996.23.)

To qualify for the CSW license, the law requires a minimum of 2,000 hours of experience in clinical psychosocial diagnosis, assessment, and treatment, including psychotherapy or counseling. Of these 2,000 hours, a minimum of 750 must be face-to-face individual or group psychotherapy. A maximum of 1,200 hours may be gained in client-centered advocacy, consultation, evaluation, and research. No more than 40 hours of experience may be gained in any given week and no more than five hours of supervision may be credited during any single week. ASWs must have at least 52 weeks of individual supervision, thirteen of which must be supervised by an LCSW. (Cal. Bus. & Prof. Code § 4996.23.)

Supervision is defined in Section 4996.23 as “responsibility for, and control of, the quality of clinical social work services being provided.” Similar to the MFT licensing laws, ASWs must keep weekly logs of their hours, and must have their supervisors complete the Supervisor Responsibility Statement. Further, ASWs and supervisors who assume responsibility for providing supervision to those working toward a license as a CSW are required to complete and sign a supervisory plan. (16 C.C.R. § 1870.1.)

To gain hours of experience in a given week, either one hour of individual supervision or two hours of group supervision is required in that week. An ASW must receive one unit (one individual or two group hours) of supervision for the first ten client hours and another unit of supervision for any additional hour above ten in a week. ASWs who work for exempt settings may receive supervision via video-conferencing. Insofar as eligible supervisors are concerned, Section 4996.23 specifies that 1,700 hours of experience must be gained under the supervision of an LCSW, and the remaining 1,500 hours may be gained under the supervision of a licensed mental health professional acceptable to the BBS. These mental health professionals are defined in the Regulations as Licensed Marriage and Family Therapists, Licensed Psychologists or physicians certified in psychiatry by the American Board of Psychiatry and Neurology. These other licensed mental health professionals must be licensed for two years, but LCSW supervisors are not subject to that requirement. (16 C.C.R. § 1874.)

Like the MFT licensing law, supervision may not be obtained from a spouse or relative, nor may it be obtained from someone with whom the applicant has a personal relationship which undermines the authority or effectiveness of the supervision. Unlike the MFT licensing law, however, there is no express prohibition against receiving supervision from one’s former therapist. (Cal. Bus. & Prof. Code § 4996.18(d).)

C. Licensed Professional Clinical Counselors

The Professional Clinical Counselor licensing laws (Cal. Bus. & Prof. Code § 4999.46) require that supervised work experience be gained post-degree. All hours of supervised work experience must be gained while registered as a Professional Clinical Counselor intern, with the exception of one special circumstance and supervised work experience gained out of state. The one exception is the supervised work hours gained immediately after graduation, but prior to registration as a PCC intern. These hours may be credited towards licensure experience requirements if the individual applies for registration within 90 days of the qualifying degree conferral date. The individual actually has to receive the registration number in order to count the hours. Thus, individuals who apply for registration, but do not complete the application requirements within one year of being notified of a deficiency, cannot take advantage of this exception. PCC interns cannot work in a private practice setting until officially registered with the BBS.

Similar to the MFT licensing laws, the PCC licensing laws require PCC interns to complete 3,000 hours of supervised experience in no less than 104 weeks. To gain hours of experience in a given week, either one hour of individual supervision or two hours of group supervision is required in that week. A PCC intern must receive one unit (one individual or two group hours) of supervision for the first ten client hours and another unit of supervision for any additional hour above ten in a week. No more than five hours of supervision may be gained in a given week. Of

the 104 weeks of supervision, at least 52 weeks must be weeks in which the intern received at least one hour of individual supervision. A maximum of 40 hours of work experience may be gained in a week. A PCC intern working in a governmental entity, a school, a college, or a university, or an institution that is both non-profit and charitable may obtain the required direct supervisor contact via videoconferencing. The supervised work experience breaks down into several categories: direct counseling work experience (minimum 1,750 hours); individual therapy/counseling (no minimum or maximum); group therapy or counseling (maximum 500 hours); telephone counseling (maximum 250 hours); non-counseling work experience (maximum 1,250 hours); administering and evaluating psychological tests, writing clinical reports, writing progress or process notes (maximum 250 hours); workshops, seminars, training sessions, or conferences (maximum 250 hours); client centered advocacy; and supervision (individual and group). Furthermore, at least 150 hours of clinical experience must be gained in a hospital or community mental health setting. (Cal. Bus. & Prof. Code § 4999.46.)

Experience may not be gained under the supervision of a spouse or relative by blood or marriage. Also, experience that is obtained under the supervision of a supervisor with whom the applicant has had or currently has a personal, professional, or business relationship that undermines the authority or effectiveness of the supervision will not be credited toward licensure. (Cal. Bus. & Prof. Code § 4999.46(f).)

D. Psychologists

The Psychologist licensing law, particularly Section 2914 of the Business and Professions Code, specifies that applicants for the license must complete 3,000 hours of supervised experience, which must be completed within a minimum of two years. At least one year of this experience must be gained after being awarded the doctorate in psychology. A year of supervised professional experience shall consist of not less than 1,500 hours.

The year of supervised experience (1,500 hours) must be completed within thirty consecutive months. When an applicant accumulates all the required experience post- doctorally, it must be completed within a period of sixty consecutive months. With respect to pre-doctoral hours, supervised professional experience may not be accumulated until the applicant has completed 48 semester/trimester or 72 quarter units of graduate level coursework in psychology, educational psychology or the equivalent. (16 C.C.R § 1387.)

The 1,500 hours of supervised experience that may be obtained prior to the awarding of the doctorate degree may be obtained in a training program approved by a university, college or school that has a training agreement with the educational institution to provide such supervised experience. If the applicant is enrolled in a doctoral program which includes an internship, the applicant may function as an intern without registration. A formal agreement between the school and the supervisor is required. The applicant is not required to register with the Board if the applicant is employed by an exempt setting, which includes: a school district; an accredited or approved educational institution; a governmental entity; or if the applicant is functioning under a waiver issued by the State of California Department of Mental Health. If the applicant has his or her doctorate and is accruing hours post-doctorally, registration with the Board of Psychology is required unless the applicant is working at one of the exempt settings mentioned above. (16 C.C.R § 1387.)

Most post-graduate applicants will need to register with the Board as a Psychological Assistant. A Psychological Assistant may gain hours of experience under employment and supervision of a Psychologist in private practice, or a licensed physician and surgeon who is board certified in psychiatry by the American Board of Psychiatry and Neurology; or any of the above-mentioned exempt settings. (Cal. Bus. & Prof. Code § 2913.) However, if the applicant possesses a doctorate degree with 1,500 hours of supervised experience, and works for a non-profit community agency which receives 25 percent or more of its funding from governmental sources, the applicant must register for employment as a Registered Psychologist. (Cal. Bus. & Prof. Code § 2909(d).)

A Psychological Assistant must be under the direction and supervision of a licensed Psychologist or Board-certified Psychiatrist who is employed by the same work setting as the Psychological Assistant and be available to the Psychological Assistant 100 percent of the time the Psychological Assistant is accruing experience hours. The supervisor must provide a minimum of one hour per week of individual face-to-face supervision to the Psychological Assistant. The supervisor must not have a disciplinary action pending against his or her license, is not on probation, has no familial or interpersonal relationship with the supervisee and is otherwise in compliance with the Psychology Licensing Law or the Medical Practice Act and their respective regulations. (16 C.C.R § 1387.)

For Registered Psychologists, the “primary supervisor” is allowed to delegate a portion of the required supervision to another licensed Psychologist or to suitable alternative supervisors, including MFTs. (16 C.C.R § 1387.)

Supervisors must assure that the services performed by the supervisees are consistent with the supervisees’ training and experience. Supervision must be either individual or group for a minimum of one hour, or ten percent of the actual time worked per week, whichever is greater. Like the MFT licensing law and regulations, a supervisor may not supervise a supervisee who has been a psychotherapy client of the supervisor, and the supervisee must maintain a weekly log of all hours of experience gained toward licensure. (16 C.C.R § 1387.)

With respect to the specific kinds of hours that may be obtained, (i.e., psychotherapy, diagnosis and treatment) the law and regulations do not, in much detail, delineate the required 3,000 hours. The experience gained must, of course, be within the scope of practice of a licensed Psychologist, which is rather broad. For instance, the practice of psychology includes psychological testing and psychological services rendered to organizations (i.e., organizational psychology), and the licensing law specifies that the application of psychological principles and methods is not necessarily restricted to the diagnosis, prevention, and treatment of psychological problems and emotional and mental disorders of individuals and groups.

Additionally, regulations require that the applicant’s supervised professional experience consists of a “planned, structured and administered sequence of professionally supervised, comprehensive clinical training experiences.” The regulations also provide that the professional experience includes “socialization into the profession of psychology and shall be augmented by integrated modalities, including mentoring, didactic exposure, role-modeling, enactment, observational/vicarious learning, and consultative guidance” and “activities which address the integration of psychological concepts and current and evolving scientific knowledge, principles,

and theories to the professional delivery of psychological services to the consumer public.” The regulations also provide that the supervised professional experience does not include custodial tasks such as filing, transcribing, or other clerical duties. The lack of specificity as to required kinds of hours permits licensure as a Psychologist without demonstrated experience in the diagnosis and treatment of mental and emotional conditions/disorders. (16 C.C.R § 1387.)

III. Examination

The MFT and CSW licensing laws specifically require the passage of a written and clinical vignette examination as a condition of licensure. The Psychologist Licensing Law, however, states that the licensing board may examine applicants by written or computer-assisted examination or both, thus leaving the manner of tests to the Board’s discretion. (Cal. Bus. & Prof Code § 2942.) Additionally, the Psychology Licensing Law allows the Board, at its discretion, to waive those parts of the examination, including either the whole of the written or computer-assisted examinations when, in the judgment of the Board, the applicant has already demonstrated competence in areas covered by those parts of the examinations. The California Psychology Supplemental Examination cannot be waived under any condition. (Cal. Bus. & Prof Code § 2946.)

The PCC licensing law requires the Board to examine the candidate with regard to his or her knowledge and professional skills and his or her judgment in the utilization of appropriate techniques and methods. The examinations will be given at least twice a year at a time and place and under supervision as the Board may determine. The Board will evaluate the national licensing examinations and determine if they meet the required standards; if not, then the Board may require the candidate to take the national examinations plus one or more Board-developed examinations. The licensing examinations shall also incorporate a California jurisprudence ethics examination element that is acceptable to the Board, or, as an alternative, the Board may develop a separate California jurisprudence and ethics examination. (Cal. Bus. & Prof Code § 4999.52.)

The rigorousness of each exam by each Board is somewhat hard to compare. While the pass/fail rates on each examination may differ, the content and relative difficulty of the exam, of course, influences the pass/fail rates. The confidentiality of each exam (required by law) also makes it difficult to make meaningful comparisons that will hold up under strict scrutiny. Anecdotal information is certainly not reliable either. Suffice it to say that all of the examinations test the applicants for their competency to safely and independently practice the profession regulated. Although each profession would probably like to take credit for having the most rigorous exams, none can do so.

IV. Summary and Conclusion

Each of the four licensing laws reviewed have differences, yet there are similarities. Each has strengths and weaknesses, whether real or perceived. Each of the provisions reviewed are enforced and regulated by the licensing boards with various degrees of effectiveness. Some of the differences are significant, and some are insignificant. The laws and regulations pertaining to each profession are founded upon differing theories. Again, our purpose is not to criticize, but to compare. From the perspective of the Licensed Marriage and Family Therapist profession, however, it should be clear from a review of this article (and the licensing laws and regulations applicable to each profession) that the requirements for MFT licensure are substantial and detailed, and that they measure up to the psychology and clinical social work professions. Thus, if and when questioned by a prospective employer, attorney, insurer, managed care company, colleague in another profession, or anyone else, the LMFT should not hesitate to make use of the comparisons covered by this article.

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HOW LMFTs COMPARE WITH OTHER MENTAL HEALTH PROFESSIONALS EDUCATION, EXPERIENCE, AND TRAINING

CATEGORY	LICENSED MARRIAGE & FAMILY THERAPIST	LICENSED CLINICAL SOCIAL WORKER	PSYCHOLOGIST	LICENSED PROFESSIONAL CLINICAL COUNSELOR
Advanced Degree	Yes MA, MS, PhD, PsyD, EdD	Yes MSW, DSW	Yes PhD, PsyD, EdD	Yes MA, MS, PhD, PsyD, EdD
Coursework in Counseling and Psychotherapy	Applicable coursework is rich in clinical content	Applicable coursework is rich in social work content	Applicable coursework can be rich in clinical content	Applicable coursework is rich in clinical content
Supervised Experience	3,000 hours	3,200 hours	3,000 hours	3,000 hours
Appropriate Work Settings	<p>While a graduate student: governmental entity, school/college/university, nonprofit or licensed health facility</p> <p>Post-graduate settings: same as while a graduate student, but after graduation, registered interns may also work in private practice settings</p>	<p>While a graduate student and post-graduate but before registration: Governmental entity, school/college/university, nonprofit or licensed health facility</p> <p>Private practice settings for registered associate clinical social workers only</p>	<p>Pre-doctoral: internship established by doctoral program; employed by an education institution, a school district, or a governmental entity; functioning under a waiver issued by the California Department of Mental Health</p> <p>Post-doctoral: same as pre-doctoral, except that as a registered psychological assistant, the individual may also be employed by a licensed psychologist, licensed physician and surgeon board-certified in psychiatry, by a clinic, by a psychological corporation, by a licensed psychology clinic or by a medical corporation</p>	<p>While a graduate student and post-graduate but before registration: Governmental entity, school/college/university, nonprofit or licensed health facility</p> <p>Private practice settings for registered professional clinical counselor interns only</p>
Licensed by State of California	Yes	Yes	Yes	Yes
Examinations	Two written examinations	Two written examinations	Two written (or computer assisted) examinations	At Board's discretion: National exams, or national exams plus one or more board-developed exams, or one or more board-developed exams

Insurance Reimbursement (California)	Private insurance and most government programs	Private insurance and government programs	Private insurance and government programs	Has not yet been determined in California
Emphasis on Primary Service	Counseling and psychotherapy with individuals, families or groups; use of applied psychotherapeutic techniques, to enable individuals to mature and grow within marriage and the family, the provision of explanations and interpretations of the psychosexual and psychosocial aspects of relationships	Counseling and psychotherapy with individuals, families, or groups; provide information and referral services; provide or arrange for the provision of social services; explain or interpret the psychosocial aspects in the situations of individuals, families, or groups; help communities to organize, to provide, or to improve social or health services; perform research related to social work	Diagnosis, prevention, treatment, and amelioration of psychological problems and emotional and mental disorders of individuals and groups	Counseling interventions and psychotherapeutic techniques to identify and remediate cognitive, mental, and emotional issues, including personal growth, adjustment to disability, crisis intervention, and psychosocial and environmental problems; counseling interventions and psychotherapeutic techniques for the purposes of improving mental health
Federal Recognition	Recognized as a Core Mental Health Discipline by the Public Health Services Act and as a Behavioral and Mental Health Professional by the National Health Service Corps	Recognized as a Core Mental Health Discipline by the Public Health Services Act and as a Behavioral and Mental Health Professional by the National Health Service Corps	Recognized as a Core Mental Health Discipline by the Public Health Services Act and as a Behavioral and Mental Health Professional by the National Health Service Corps	Recognized as a Behavioral and Mental Health Professional by the National Health Service Corps

SCOPES OF PRACTICE
CALIFORNIA BUSINESS & PROFESSIONS CODE

LICENSED MARRIAGE AND FAMILY THERAPIST

§4980.02

For the purposes of this chapter, the practice of marriage and family therapy shall mean that service performed with individuals, couples, or groups wherein interpersonal relationships are examined for the purpose of achieving more adequate, satisfying, and productive marriage and family adjustments. This practice includes relationship and pre-marriage counseling.

The applications of marriage and family therapy principles and methods includes, but is not limited to, the use of applied psychotherapeutic techniques, to enable individuals to mature and grow within marriage and the family, the provision of explanations and interpretations of the psycho-sexual and psychosocial aspects of relationships, and the use, application, and integration of the coursework and training required by Sections 4980.36, 4980.37 and 4980.41.

LICENSED CLINICAL SOCIAL WORKER

§4996.9

The practice of clinical social work is defined as a service in which a special knowledge of social resources, human capabilities, and the part that unconscious motivation plays in determining behavior, is directed at helping people to achieve more adequate, satisfying, and productive social adjustments. The application of social work principles and methods includes, but is not restricted to, counseling and using applied psychotherapy of a nonmedical nature with individuals, families, or groups; providing information and referral services; providing or arranging for the provision of social services; explaining or interpreting the psychosocial aspects in the situations of individuals, families, or groups; helping communities to organize, to provide, or to improve social or health services; or doing research related to social work.

Psychotherapy, within the meaning of this chapter, is the use of psychosocial methods within a professional relation-ship, to assist the person or persons to achieve a better psychosocial adaptation, to acquire greater human realization of psychosocial potential and adaptation, to modify internal and external conditions which affect individuals, groups, or communities in respect to behavior, emotions, and thinking, in respect to their intrapersonal and interpersonal processes.

LICENSED PROFESSIONAL CLINICAL COUNSELOR

§4999.20

(1) "Professional clinical counseling" means the application of counseling interventions and psychotherapeutic techniques to identify and remediate cognitive, mental, and emotional issues, including personal growth, adjustment to disability, crisis intervention, and psychosocial and environmental problems.

"Professional clinical counseling" includes conducting assessments for the purpose of establishing counseling goals and objectives to empower individuals to deal adequately with life situations, reduce stress, experience growth, change behavior, and make well-informed, rational decisions.

(2) "Professional clinical counseling" is focused exclusively on the application of counseling interventions and psychotherapeutic techniques for the purposes of improving mental health, and is not intended to capture other, nonclinical forms of counseling for the purposes of licensure. For purposes of this paragraph, "nonclinical" means nonmental health.

(3) "Professional clinical counseling" does not include the assessment or treatment of couples or families unless the professional clinical counselor has completed all of the following additional training and education, beyond the minimum training and education required for licensure:

(A) One of the following:

(i) Six semester units or nine quarter units specifically focused on the theory and application of marriage and family therapy.

(ii) A named specialization or emphasis area on the qualifying degree in marriage and family therapy; marital and family therapy; marriage, family, and child counseling; or couple and family therapy.

(B) No less than 500 hours of documented supervised experience working directly with couples, families, or children.

(C) A minimum of six hours of continuing education specific to marriage and family therapy, completed in each license renewal cycle.

(4) "Professional clinical counseling" does not include the provision of clinical social work services.

(b) "Counseling interventions and psychotherapeutic techniques" means the application of cognitive, affective, verbal or nonverbal, systemic or holistic counseling strategies that include principles of development, wellness, and maladjustment that reflect a pluralistic society. These interventions and techniques are specifically implemented in the context of a professional clinical counseling relationship and use a variety of counseling theories and approaches.

(c) "Assessment" means selecting, administering, scoring, and interpreting tests, instruments, and other tools and methods designed to measure an individual's attitudes, abilities, aptitudes, achievements, interests, personal characteristics, disabilities, and mental, emotional, and behavioral concerns and development and the use of methods and techniques for understanding human behavior in relation to coping with, adapting to, or ameliorating changing life situations, as part of the counseling process. "Assessment" shall not include the use of projective techniques in the assessment of personality, individually administered intelligence tests, neuropsychological testing, or utilization of a battery of three or more tests to determine the presence of psychosis, dementia, amnesia, cognitive impairment, or criminal behavior.

(d) Professional clinical counselors shall refer clients to other licensed health care professionals when they identify issues beyond their own scope of education, training, and experience.

LICENSED PSYCHOLOGIST

§2903

No person may engage in the practice of psychology, or represent himself or herself to be a psychologist, without a license granted under this chapter, except as otherwise provided in this chapter. The practice of psychology is defined as rendering or offering to render for a fee to individuals, groups, organizations or the public any psychological service involving the application of psychological principles, methods, and procedures of understanding, prediction, and influencing behavior, such as the principles pertaining to learning, perception, motivation, emotions, and interpersonal relationships: and the methods and

procedures of inter-viewing, counseling, psychotherapy, behavior modification, and hypnosis; and of constructing, administering, and interpreting tests of mental abilities, aptitudes, interests, attitudes, personality characteristics, emotions, and motivations.

The application of such principles and methods includes, but is not restricted to: diagnosis, prevention, treatment, and amelioration of psychological problems and emotional and mental disorders of individuals and groups.

Psychotherapy within the meaning of this chapter means the use of psychological methods in a professional relationship to assist a person or persons to acquire greater human effectiveness or to modify feelings, conditions, attitudes and behavior which are emotionally, intellectually, or socially ineffectual or maladjustive.

As used in this chapter, "fee" means any charge, monetary or otherwise, whether paid directly or paid on a prepaid or capitation basis by a third party, or a charge assessed by a facility, for services rendered.