



Board of Behavioral Sciences

Memo

1625 North Market Blvd., Suite S-200
Sacramento, CA 95834
(916) 574-7830, (916) 574-8625 Fax
www.bbs.ca.gov

To: Committee Members
Date: November 10, 2021
From: Rosanne Helms
Legislative Manager
Telephone: (916) 574-7897
Subject: **Discussion and Review of Six-Year Limit on Experience Hours and Associate Registrations**

Introduction

LCSW, LMFT and LPCC statutes set forth the following six-year limits for registrants gaining supervised experience hours:

1. Age of Experience Hours

Hours of supervised experience must be completed during the six-year period prior to submitting the application for licensure (aka examination eligibility). Once experience hours are six years old (based on the submittal date of the application), they expire and do not count toward a license. There is one exception to this – for LMFT applicants, the 500 hours of clinical experience gained in supervised practicum as a trainee is exempt from the six-year requirement. (BPC §§4980.43, 4996.23, 4999.46)

2. Length of Associate Registration

An associate registration may be renewed five times, so it can be held for a total of six consecutive years. If the supervised experience has not been completed (or if the employer requires it, etc.) a new registration may be obtained. However, individuals issued a subsequent registration are NOT permitted to work in a private practice setting. There are no exceptions. (BPC §§4984.01, 4996.28, 4999.100)

While LEP law is structured a bit differently, it has a similar limitation. It does not require registration with the Board in order to gain experience toward licensure. However, LEP law requires two years of full-time experience as a credentialed school psychologist in public schools as a condition of licensure. This experience must have been obtained no more than six years prior to application for licensure. (BPC §4989.20)

The rationale behind the limits are that they protect the public by ensuring applicants for a license have recent relevant experience. It also ensures that applicants continue

progressing through the licensing process, by prohibiting working in a private practice perpetually without ever becoming licensed.

Based on the information available, it appears that both the LMFT and LCSW programs have always limited the length of registrations, initially to five years. It was increased in 1986 to six years.¹

Previous Committee Discussion

The Board's standing committees have discussed this topic several times in the past years due to stakeholder requests. Options the Committee had considered in the past are as follows:

- Allow exceptions to the six-year rules to certain applicants due to specific circumstances such as military service, being a primary caregiver, or disability.
- Extending one or both of the six year limits to a longer period of time, such as 7 or 8 years.
- Abolishing the work setting limits of a subsequent registration number, but implementing stricter requirements to obtain a subsequent registration number.
- Determining if other law changes meant to streamline the licensure process cut time to licensure.

The Policy and Advocacy Committee last discussed this topic in 2018. At the time, the Committee noted that there were several law changes recently enacted or upcoming that may assist applicants with gaining hours more expeditiously. Therefore, the Committee asked the issue be re-examined once the benefits of these changes had an opportunity to be realized. They were as follows:

- The elimination of the "buckets" – specific categories of experience – for LMFT and LPCC applicants. (This became effective on January 1, 2016.)
- Decreasing in required experience hours for LCSW applicants from 3,200 hours to 3,000 hours. (Effective January 1, 2019.)
- Allowing triadic supervision in lieu of individual supervision for LMFT, LCSW, and LPCC applicants. (Effective January 1, 2019.)

These changes were designed to increase the applicant's ability to gain experience hours, while preserving public protection safeguards such as ensuring quality supervision and the need for applicants for licensure to have current and relevant experience.

¹ AB 3657 (Chapter 1365, Statutes of 1986)

In addition, another bill, AB 690, that may assist with gaining of hours was recently signed by the Governor, and becomes effective January 1, 2022. AB 690 allows private practices and professional corporations to utilize contract supervisors. It also increases the allowable number of supervisees per supervisor in a non-exempt setting from 3 to 6.

Number of Registrants on a Subsequent Registration Number

Attachment A shows the number of AMFTs, ASWs, and APCCs currently on a subsequent registration number. It compares that to the same data for AMFTs and ASWs in 2018. (Because the LPCC license is newer, there were not any APCCs on a subsequent number in 2018, because no registration numbers were 6 years old yet.) The table looks at all the current and delinquent registrations that are on a subsequent registration number, as a percentage of total registrants of that type.

- For AMFTs, 15.3% of the registrant population is currently on a subsequent number.
- For ASWs, 11.2% of the registrant population is currently on a subsequent number.
- For APCCs, 5.9% of the registrant population is currently on a subsequent number.

Time to Complete Supervised Experience Hours

Next, Board staff compiled data on the number of years applicants are taking to gain the required supervised experience hours. The results are shown in

Attachment B. Data is shown by year, based on the year applicants were approved to take the clinical exam, to present. It is then compiled as overall data spanning from 2015 to 2020.

The overall (2015-2020) data shows the following:

- It is taking LMFT applicants an average (mean) of 3.80 years to gain their required supervised experience hours. The median is 3.33 years.
- It is taking LCSW applicants an average (mean) of 4.12 years to gain their required supervised experience hours. The median is 3.67 years.
- It is taking LPCC applicants an average (mean) of 3.00 years to gain their required supervised experience hours. The median is 2.83 years.

Common Reasons for Needing a Subsequent Registration Number

A registrant might need a subsequent registration number for many reasons. The Board's evaluators talk to registrants daily and have a good pulse on the most common reasons for obtaining a subsequent registration number. They cited the following:

- Registrant stopped gaining hours to raise a family
- Illness (self)
- Caregiver for a family member with an illness
- Working part-time
- Unable to obtain employment or supervision
- Still need a registration number for work purposes (for example, they are in the exam cycle, or are in the process of applying for licensure, but a registration number is required at their job.)
- Registrant was denied a portion of their hours during the evaluation process for some reason (for example, the supervisor was not licensed for two years prior to supervision, too many non-clinical hours, etc.) and hours must be made up.
- Registered with the Board many years ago, decided not to pursue licensure, and then later decided to pursue licensure.

Older Research on Time to Gain Experience Hours

The Board previously researched time to gain experience hours or time to obtain licensure. However, it should be noted that different methods were used to gather the data below, so it is not directly comparable. The method staff used to gather the current data above was based on the features and limitations of the new Breeze database system, which was not available for use at the time the older data was compiled.

2014 Research

LMFT Applicants: In late 2014, data was compiled on 100 LMFT applicants who recently completed their experience hours. Of those sampled:

- **78%** were able to obtain their post-degree hours in **less than 4 years** from the date of graduation (*does NOT include pre-degree hours*).
- The **average** length of time to complete the experience was **3.4 years**.
- The **median** length was **3 years**.

2008 Research

In July 2008, the Board conducted a study of its licensing processes based on data for all 2002, 2003, and 2004 graduates that registered with the Board. Below is the resulting table that shows the time (in years) involved from graduation to license, and from registration application submission to license, for three graduating classes. It shows that, for those graduating classes, it typically takes approximately 3 to 4

years for an ASW to obtain a license once they have submitted their registration application.

Average Years from Graduation to License and						
Registration Application Submission to License						
Timeframe (in years)	2002 Grads	2003 Grads	2004 Grads			
	ASW	ASW	ASW			
Grad to License	4.55	3.99	3.40			
Registration Application Submission to License	4.13	3.66	3.09			

Although the methods used for the data above are not directly comparable to the methods used to gather the most recent data, they appear to suggest a similar, and fairly consistent result about the amount of time it takes to gain supervised experience hours.

Options for Discussion

The Committee may wish to conduct an open discussion on the following:

- The six-year limit on the age of hours of experience; and
- The six-year length of the initial registration number and the inability of a registrant to work in a private practice after this period has ended.

Attachment C shows examples of how other states, as well as the California Board of Psychology, limit age of hours earned.

Attachments

Attachment A: Number of Registrants on a Subsequent Registration Number

Attachment B: Years to Complete Supervised Experience Hours

Attachment C: Requirements of Other States and California Board of Psychology Regarding Age of Experience Hours

Blank Page

Attachment A**Number of Registrants on a Subsequent Registration Number**

	2018 [1]		2021 [2]		
	AMFTs	ASWs	AMFTs	ASWs	APCCs
Number of Registrants on a Subsequent Registration Number [1]	2,361	1,658	2,304	1,915	170
Total Registrants [2]	18,666	15,855	15,031	17,136	2,877
Percent of Total on a Subsequent Registration Number	12.6%	10.5%	15.3%	11.2%	5.9%

[1] Shows subsequent registrations and total registrations that are current and delinquent as of January 16, 2018.

[1] Shows subsequent registrations and total registrations that are current and delinquent as of November 2021.

Attachment B
Years to Complete Supervised Experience Hours

	Years to Complete Supervised Experience By Year and Overall [1]																											
	2015				2016				2017				2018				2019				2020				OVERALL			
	MEAN	MEDIAN	MODE	RECORD	MEAN	MEDIAN	MODE	RECORD	MEAN	MEDIAN	MODE	RECORD	MEAN	MEDIAN	MODE	RECORD	MEAN	MEDIAN	MODE	RECORD	MEAN	MEDIAN	MODE	RECORD	MEAN	MEDIAN	MODE	RECORD
LMFT Applicant	3.62	3.33	2.92	2,220	3.84	3.58	2.83	3,343	3.97	3.67	2.42	3,204	3.90	3.33	2.25	3,126	3.77	3.17	2.83	2,352	3.65	3.08	2.58	3,342	3.80	3.33	2.83	17,587
LCSW Applicant	4.10	3.83	3.17	1,079	4.28	3.92	3.00	1,820	4.21	3.75	2.67	2,237	4.01	3.42	2.92	2,507	4.12	3.50	2.92	1,948	4.05	3.42	3.00	2,473	4.12	3.67	2.92	12,064
LPCC Applicant	2.15	2.50	3.08	49	2.35	2.42	2.92	139	2.64	2.67	2.67	181	2.64	2.67	2.67	244	3.21	2.92	2.83	312	3.36	3.25	2.42	337	3.00	2.83	2.83	1,262

[1] Based on year they were approved for the clinical exam, to present.

ATTACHMENT C
REQUIREMENTS OF OTHER STATES AND CA BOARD OF PSYCHOLOGY

New York – Marriage and Family Therapist

New York State Regulations of the Commissioner, Subpart 79-10, Marriage and Family Therapy

79-10.4 Limited permits.

As authorized by section 8409 of the Education Law, the department may issue a limited permit to practice marriage and family therapy in accordance with the requirements of this section, to allow an applicant to practice under supervision while meeting the experience and/or examination requirements for licensure.

- a. An applicant for a limited permit to practice marriage and family therapy shall:
 1. file an application for a limited permit with the department and pay the application fee, as prescribed in section 8409(3) of the Education Law;
 2. meet all requirements for licensure as a marriage and family therapist, including but not limited to the moral character and education requirements, except the examination and/or experience requirements; and
 3. be under the supervision of a supervisor acceptable to the department in accordance with the requirements of section 79-10.3 of this Subpart.
- b. In accordance with the requirements of section 79-10.3 of this Subpart, the limited permit in marriage and family therapy shall be issued for specific employment setting(s), acceptable to the department and the permit shall identify a qualified supervisor, acceptable to the department.
 1. The supervisor shall be responsible for appropriate oversight of all services provided by a permit holder under his or her general supervision.
 2. No supervisor shall supervise more than five permit holders at one time.
- c. The limited permit in marriage and family therapy shall be valid for a period of not more than 24 months, provided that the limited permit may be extended for no more than two additional 12 month periods at the discretion of the department if the department determines that the permit holder has made good faith efforts to successfully complete the examination and/or experience requirements but has not passed the licensing examination or completed the experience requirement, or has other good cause as determined by the department for not completing the examination and/or experience requirement, and provided further that the time authorized by such limited permit and subsequent extensions shall not exceed 48 months total.

Texas – LMFT Associate (Texas State Board of Examiners of Marriage and Family Therapists, 22 TAC Part 35, Chapter 801)

Rule §801.202. LMFT Associate License.

(a) The initial LMFT Associate license will be issued for a period of 24 months and may be renewed biennially for a period not to exceed a total of 72 months.

(b) An LMFT Associate who has held the LMFT Associate license for 72 months and submitted documentation to the council to satisfy all minimum requirements for LMFT licensure, except the 500 hour requirement set in §801.142(1)(B) of this title (relating to Supervised Clinical Experience Requirements and Conditions) and requiring at least 500 hours of direct clinical services to couples or families, may renew his or her LMFT Associate license only once more (not exceeding 96 months of licensure as an LMFT Associate).

(c) An LMFT Associate who has held the LMFT Associate license for 72 months (or 96 months if subsection (b) of this section applies) and has not met the minimum requirements for LMFT licensure, may not renew but must reapply for the LMFT Associate license, meeting all current application requirements and passing the national licensure examination no more than six months before the date the application is received.

Massachusetts – Mental Health Counselors

262 CMR 2.00: Requirements For Licensure As a Mental Health Counselor

§2.07: Post-master's Degree Clinical Field Experience Requirements

(1) Eligible applicants must complete, in no less than two and no more than eight years, a minimum of two years of full-time or equivalent part-time, post-Master's degree Supervised Clinical Field Experience and Direct Client Contact Experience.

Washington – Mental Health Counselor, Social Worker, and Marriage and Family Therapist Associates

RCW Title 18, Chapter 18.225, § 18.225.145

Associate licensing—Requirements.

(1) The secretary shall issue an associate license to any applicant who demonstrates to the satisfaction of the secretary that the applicant meets the following requirements for the applicant's practice area and submits a declaration that the applicant is working toward full licensure in that category:

(a) Licensed social worker associate—advanced or licensed social worker associate—independent clinical: Graduation from a master's degree or doctoral degree

educational program in social work accredited by the council on social work education and approved by the secretary based upon nationally recognized standards.

(b) Licensed mental health counselor associate: Graduation from a master's degree or doctoral degree educational program in mental health counseling or a related discipline from a college or university approved by the secretary based upon nationally recognized standards.

© Licensed marriage and family therapist associate: Graduation from a master's degree or doctoral degree educational program in marriage and family therapy or graduation from an educational program in an allied field equivalent to a master's degree or doctoral degree in marriage and family therapy approved by the secretary based upon nationally recognized standards.

(2) Associates may not provide independent social work, mental health counseling, or marriage and family therapy for a fee, monetary or otherwise. Associates must work under the supervision of an approved supervisor.

(3) Associates shall provide each client or patient, during the first professional contact, with a disclosure form according to RCW [18.225.100](#), disclosing that he or she is an associate under the supervision of an approved supervisor.

(4) The department shall adopt by rule what constitutes adequate proof of compliance with the requirements of this section.

(5) Applicants are subject to the denial of a license or issuance of a conditional license for the reasons set forth in chapter [18.130](#) RCW.

(6)(a) Except as provided in (b) of this subsection, an associate license may be renewed no more than six times, provided that the applicant for renewal has successfully completed eighteen hours of continuing education in the preceding year. Beginning with the second renewal, at least six of the continuing education hours in the preceding two years must be in professional ethics.

(b) If the secretary finds that a waiver to allow additional renewals is justified due to barriers to testing or training resulting from a governor-declared emergency, additional renewals may be approved.

Florida Statutes, Title XXXII, Chapter 491 (Clinical, Counseling, and Psychotherapy Services)

491.0045 Intern registration; requirements.—

(1) An individual who has not satisfied the postgraduate or post-master's level experience requirements, as specified in s. [491.005](#)(1)(c), (3)(c), or (4)(c), must register as an intern in the profession for which he or she is seeking licensure before commencing the post-master's experience requirement or an individual who intends to satisfy part of the required graduate-level practicum, internship, or field experience, outside the academic arena for any profession, and must register as an intern in the profession for which he or she is seeking licensure before commencing the practicum, internship, or field experience.

(2) The department shall register as a clinical social worker intern, marriage and family therapist intern, or mental health counselor intern each applicant who the board certifies has:

- (a) Completed the application form and remitted a nonrefundable application fee not to exceed \$200, as set by board rule;
- (b)1. Completed the education requirements as specified in s. [491.005](#)(1)(c), (3)(c), or (4)(c) for the profession for which he or she is applying for licensure, if needed; and
2. Submitted an acceptable supervision plan, as determined by the board, for meeting the practicum, internship, or field work required for licensure that was not satisfied in his or her graduate program.
- (c) Identified a qualified supervisor.
- (3) An individual registered under this section must remain under supervision while practicing under registered intern status.
- (4) An individual who fails to comply with this section may not be granted a license under this chapter, and any time spent by the individual completing the experience requirement as specified in s. [491.005](#)(1)(c), (3)(c), or (4)(c) before registering as an intern does not count toward completion of the requirement.
- (5) An intern registration is valid for 5 years.
- ¹(6) A registration issued on or before March 31, 2017, expires March 31, 2022, and may not be renewed or reissued. Any registration issued after March 31, 2017, expires 60 months after the date it is issued. A subsequent intern registration may not be issued unless the candidate has passed the theory and practice examination described in s. [491.005](#)(1)(d), (3)(d), and (4)(d).
- (7) An individual who has held a provisional license issued by the board may not apply for an intern registration in the same profession.

CA Board of Psychology

California Code of Regulation (CCR) Title 16 §1387(a)

§ 1387. Supervised Professional Experience.

- (a) Pursuant to section 2914(c) of the code, two years of qualifying SPE shall be completed and documented prior to licensure. One year of SPE shall be defined as 1500 hours. At least one year of SPE shall be completed postdoctorally. Each year of SPE shall be completed within a thirty (30) consecutive month period. If both years of SPE (3000 hours) are completed postdoctorally, they shall be completed within a sixty (60) month period. Upon showing of good cause as determined by the board, these specified time limitations may be reasonably modified.