

Behavioral Health Sub-Report

Marriage & Family Therapy

Overview

The practice of marriage and family therapy is regulated in all 50 states. In Utah, the regulation of marriage and family therapy is overseen by the Division of Professional Licensing, Department of Commerce. Current license types include Marriage & Family Therapist (MFT) and Associate MFT (AMFT).

License Type	Scope	Authority	Education	Experience	Exam
MFT	Mental Health Therapist	Independent	Master's Degree	✓	✓
AMFT	Mental Health Therapist	Supervised	Master's Degree	-	-

Fee Structure

License Type	Initial Licensing Fee		Annualized Renewal Fee	
	Utah Fee	US Median	Utah Fee	US Median
MFT	\$120	\$200	\$47	\$83
AMFT	\$85	\$150	\$0	\$76

Complaints

During the past 5 years (2018-2022), an average of **42** complaints were filed annually against an average of **33** Utah marriage and family therapists—or **2.9%** of active licensees in any given year. On average, **15** of those complaints were found to be substantiated (36%).¹ Common types of substantiated complaints among behavioral health licensees include violations of ethical standards, incompetence and/or negligence, sexual misconduct, criminal conduct, substance use, unauthorized practice, and failure to release records.

¹ OPLR Analysis of DOPL Substantiated Complaint Data

Wait Times and Active Licensees

On average, Utah marriage and family therapists report that at their primary practice location there is a **~43 day wait time** for those seeking care.² This is higher than the **~37 day** average across Utah’s behavioral health care field, as well as the **10 day CMS** guideline.³

Name	# Active Licensees	Annualized 5-Year Growth Rate ⁴
MFT	1,248	14.05%
AMFT	289	15.90%
All	1539 ⁵	14.28%

Recommendations

Relevant Recommendations from OPLR’s Periodic Review

The following recommendations from OPLR’s periodic review of the regulation of the behavioral health care workforce are relevant for marriage and family therapy (see final report for additional information):

- 1a. Supervisor Requirements
- 1b. Supervision Hours
- 1c. Continuing Education
- 2a. Exam Alternate Path
- 2b. Interstate Compacts
- 3a. Recovery Assistance (UPHP)
- 3b. Safety Checks & Disclosures
- 5a. Multi-Profession Board

Additional Recommendations

In addition to the field-level recommendations above, OPLR recommends that Utah policymakers enact the following changes to the regulation of marriage and family therapists:

- **Relational Supervision Hours.** Reduce the total and proportion of relational hours required for marriage and family therapist licensure from 50% to ~25% of direct client care hours (e.g., from 500 of 1000 currently required direct client care hours to 300-375 of the 1200-1500 recommended direct client care hours). (*R156-60b-302b*)
- **Clinical Exam Requirement.** Accept the California Board of Behavioral Sciences’ Licensed Marriage and Family Therapist Clinical Examination in addition to accepting the National Marriage and Family Therapy Examination for licensure as a Utah marriage and family therapist. (*R156-60b-302c*)

² OPLR Behavioral Health Care Workforce Survey (CPMDS)

³ Centers for Medicare & Medicaid Services Center for Consumer Information and Insurance Oversight (2022). *2023 Letter to Issuers in the Federally-facilitated Exchanges*. [online] U.S. Department of Health and Human Services. Available at: <https://www.cms.gov/files/document/2023-draft-letter-issuers-508.pdf>

⁴ OPLR Analysis of DOPL Licensing Data

⁵ The number of marriage and family therapists and associate marriage and family therapists do not sum to the total number of active licensees due to holders of license subtypes not listed above (e.g., interns).

Relational Supervision Hours

Summary of Recommendation

Reduce the total and proportion of relational hours required for marriage and family therapist licensure from 50% to ~25% of direct client care hours (e.g., from 500 of 1000 currently required direct client care hours to ~300-375 of the 1200-1500 recommended direct client care hours). (*R156-60b-302b*)

Status Quo. Marriage and family therapists' (MFTs) post-graduate supervised experience hours include a unique emphasis on hours spent providing couples or family therapy with two or more clients participating (i.e., relational hours). Currently, Utah's requirement for relational hours is set at 500 (or 50%) of the required 1,000 supervised hours of mental health therapy.⁶

Existing Approaches. **24** U.S. jurisdictions specifically require relational hours for licensure for marriage and family therapists, while **27** do not. Across all U.S. states and territories, the range of relational hours required spans from 0 to 1,000, with an average of **~300 hours** required, and an average proportion of required relational hours to direct client care hours of **~20%**.

Rationale. Although this requirement importantly reflects the field's focus on treating couples and families, accruing relational hours in practice may be difficult for incoming MFTs such that they may far surpass the total number of required direct client care hours before they are able to acquire the required number of hours specifically in couples or family therapy.⁷ In essence, this may delay clinicians entering the field until long after they have accumulated the overall number of supervised hours required.

Industry stakeholders report that the current policy may even have the unintended effect of incentivizing associate clinicians to pressure solo clients to involve others in their treatment, regardless of whether that is in the best interests of the client or not.⁸ In other words, over time, the need to complete these hours may induce practitioners to prioritize their own licensure requirements over the optimal course of care for their patients.

Further, although this requirement is unique to marriage and family therapy, they are not the only professionals who are ultimately authorized to independently provide treatment to couples, families, and groups. Mental health therapists from other behavioral health occupations (e.g., licensed clinical social workers, clinical mental health counselors, and psychologists) may also provide treatment interventions to couples and families, without the additional burden of proving that a specified portion of their supervised direct client care hours were obtained in this way. Still, providing a state-protected title of "marriage and family therapist" may indicate to consumers that

⁶ [R156-60b-302b\(1\)\(c\)](#)

⁷ OPLR Listening & Vetting Tour; OPLR Behavioral Health Care Workforce Survey (CPMDS)

⁸ OPLR Listening & Vetting Tour

practitioners have additional expertise and experience in this domain.⁹ Consumers' reliance on this professional distinction may justify at least some minimum requirement for couples and family therapy during supervised experience hours, alongside the additional focus provided during MFT degree programs, practicum, and exams.

Reducing this requirement from 50% to 25% of the total number of required direct client care hours may be beneficial. Practitioners report that this proportion is a closer fit to what tends to happen in practice—or in other words, that in their experience, typically ~20-30% of practitioners' cases involve couples or family therapy.¹⁰ As part of the broader periodic review of behavioral health occupational regulation, OPLR recommended increasing the requirement for direct client contact hours from 1,000 to between 1,200 to 1,500 hours. If this broader recommendation is adopted, then the relational hour requirement for MFTs might be appropriately adjusted to between 300-375. If the requirements for direct client contact hours are not increased, requiring ~200-300 hours would be appropriate.

Clinical Exam Requirement

Summary of Recommendation

Accept the California Board of Behavioral Sciences' Licensed Marriage and Family Therapist Clinical Examination in addition to accepting the National Marriage and Family Therapy Examination for licensure as a Utah marriage and family therapist. (*R156-60b-302c*)

Status Quo. Currently, Utah requires marriage and family therapists to pass the National Marriage and Family Therapy Examination (NMFTE) administered by the Association of Marital and Family Therapy Regulatory Boards (AMFTRB), referred to hereafter as the “national exam.”

Existing Approaches. While the National Exam is required for marriage and family therapist licensure in nearly all U.S. states and territories, several jurisdictions require or accept the California Board of Behavioral Science (BBS) Licensed Marriage and Family Therapist Clinical Examination—referred to hereafter as the “California exam.”

Rationale. Expanding the list of accepted exams for MFT licensure in Utah to include the California exam may help to promote greater access to care for Utah consumers. First, the jurisdictions that already accept the California exam—California, Oregon, and Texas—account for a major portion of Utah's total in-migration. According to research by the Kem C. Gardner Policy Institute, western states (such as CA, ID, WA, OR, and AZ) contribute almost 50% of in-migrants to Utah and

⁹ MacLeod, B.P., McMullen, J.W., Teague-Palmieri, E.B. and Veach, L.J. (2016). What Does the Public Know About Professional Counseling? A Study of Public Knowledge and Perception of Professional Counselors. *Journal of Counselor Leadership and Advocacy*, 3(2), pp.95–110.
doi:<https://doi.org/10.1080/2326716x.2015.1124815>.

¹⁰ OPLR Listening & Vetting Tour

southern states (particularly TX and FL) account for nearly a third of in-migrants.¹¹ At the state level, Utah nets the most migrants from California each year.¹² Accepting the California exam may thus be helpful for practitioners who relocate or wish to provide telehealth in Utah while they are still in the process of obtaining licensure, or before they have been licensed for a full year.¹³ Since Utah already accepts the California exam as part of licensure by endorsement for applicants from California, Oregon, and Texas, this change would promote greater consistency in licensing requirements regardless of the career stage at which applicants seek licensure in Utah.¹⁴

Second, providing multiple options may be beneficial for Utah candidates whose circumstances make it difficult to travel to national exam testing sites. The national exam is administered only at Prometric testing centers, of which there are four in the state, located in St. George, Lindon, Taylorsville, and Salt Lake. The California exam is administered at Pearson Vue testing centers, of which there are substantially more options available with 15 locations throughout the state including Moab, Cedar City, St. George, Richfield, Delta, Price, Roosevelt, Bountiful, Kaysville, and Ogden. In short, accepting the California exam would effectively triple the number of counties (from 3 to 9) in Utah where incoming MFTs can take license qualifying exams.

Third, the California exam appears to be more convenient than the National exam in several ways. After being approved to take the exam by their state licensing agency, California test takers may take their exam as soon as 24 hours later, while National exam test takers must wait at least 6 weeks. The California exam is available continuously, whereas the National exam is administered only one week each month during a testing window. And the California exam provides an immediate score, whereas it takes approximately 20 days for test takers to receive National exam scores.¹⁵ The California exam is also less expensive for candidates. The California exam costs \$250 per attempt,¹⁶ while the national exam is \$365 per attempt.¹⁷

¹¹ Harris, E. (2021). *Moving Past Net Migration: Demographic Characteristics of Utah's Recent Migrants*. Kem C. Gardner Policy Institute. Available at: <https://gardner.utah.edu/wp-content/uploads/Migrant-Demographic-Characteristics-June2021-Final.pdf?x71849>

¹² Harris, E. (2023). *The Geography of Utah's Migration: A County Level Analysis*. Kem C. Gardner Policy Institute. Available at: <https://gardner.utah.edu/wp-content/uploads/MigrationRep-May2023.pdf>. Nearly 10,000 more new residents move to Utah from California than move to California each year.

¹³ Although licensure by endorsement already enables interstate portability for those who have obtained licensure, it is only available after licensees have held their license in good standing for one year or more. Those who relocate while completing their education, exam, and experience requirements are not eligible for licensure by endorsement.

¹⁴ Utah Division of Professional Licensing (2022). *Endorsement to Utah: MFT*. [online] Available at: <https://dopl.utah.gov/wp-content/uploads/2022/11/endorsement-to-utah-marriage-family-counselor.pdf>.

¹⁵ Association of Marital & Family Therapy Regulatory Boards (2023). *Handbook for Candidates of the AMFTRB Marital and Family Therapy National Examination*. [online] Professional Testing Corporation. Available at: <https://ptcny.com/pdf/AMFTRB2023.pdf>.

¹⁶ California Board of Behavioral Sciences (2023). *Licensed Marriage and Family Therapist Application for Licensure*. [online] bbs.ca.gov. Available at: <https://www.bbs.ca.gov/pdf/forms/mft/mftapp.pdf>.

¹⁷ Association of Marital & Family Therapy Regulatory Boards (2023). *Handbook for Candidates of the AMFTRB Marital and Family Therapy National Examination*. [online] Professional Testing Corporation. Available at: <https://ptcny.com/pdf/AMFTRB2023.pdf>.

Several pieces of evidence also suggest that the California exam is at least moderately comparable to the national exam. California BBS representatives revealed that an ongoing comparison of the two tests by psychometricians had not, to date, raised substantial concerns regarding their comparability,^{18,19} and a side-by-side comparison of exam content shared with OPLR organization shows substantial overlap in covered subject areas.²⁰ Further, Utah already accepts candidates from California, Oregon, and Texas via licensure by endorsement, without requiring any additional verification of other qualifications or competency. In essence, for out-of-state candidates, the California exam is already approved as a substitute for the national exam.²¹

Comparison of MFT Qualifying Exams—National vs. California		
	National Exam	California Exam
Test Administration	One week per month	Continually
Minimum Wait to take Exam	6 weeks	24 hours
Score Notification	Within 20 business days after the close of the testing period (~4wks)	Immediately following the exam
Exam Fee	\$365	\$250
Rescheduling Fee	\$50 - \$175	\$0 - \$250
Re-Exam Period	90 days	120 Days
Test Administrator	Prometric Testing Centers	Pearson VUE
Authorized Test Centers	490	1,800
Authorized Test Center in UT	4	15
Accommodations	Yes	Yes
Questions	180 Multiple choice questions	170 Multiple choice questions
Time	4 Hours	4 Hours

Key Considerations. Policymakers may wish to conduct additional research to systematically evaluate and compare the national exam and the California exam more closely. If this process reveals important differences in the exams, policymakers may wish to accept this exam only in conjunction with other qualifications. Further, while the California exam offers certain advantages over the national exam, policymakers should bear in mind that those wishing to take this exam must still meet California’s eligibility requirements to be allowed to sit for the exam—including education and supervised experience requirements based on California’s licensing laws. Thus, the

¹⁸ OPLR conversation with BBS representatives.

¹⁹ The California exam content outline is available at:

<https://home.pearsonvue.com/Clients/California-Board-of-Behavioral-Sciences.aspx>. The national exam content outline is available at <https://amftrb.org/exam-info/> or <https://ptcny.com/pdf/AMFTRB2023.pdf>

²⁰ Sodergren, S. (2023). *CA Exam Information* [Email] Communication from the California Board of Behavioral Sciences.

²¹ Utah Division of Professional Licensing (2022). *Endorsement to Utah: MFT*. [online] Available at: <https://dopl.utah.gov/wp-content/uploads/2022/11/endorsement-to-utah-marriage-family-counselor.pdf>.

total burden of obtaining licensure in Utah through the California exam may entail additional work not needed for the national exam. Policymakers should also be aware that there is no guarantee that the California exam will be offered into perpetuity. The California Association of Marriage and Family Therapists recently proposed adopting the national exam, to enable greater portability for California MFTs who relocate or who wish to provide telehealth across state lines. While this proposal has not yet been voted upon by the California BBS, this body previously discontinued their state-specific social work examination, so it is certainly conceivable that they may elect to do so again in this case. Policymakers and other interested parties may wish to further advocate for change with the national exam provider to ensure that licensure applicants are not unduly burdened by the process of passing this exam.