



UTAH DEPARTMENT
OF COMMERCE

Office of Professional Licensure Review

Sunrise Review

Life Coaching

November 2024

*Prepared in response to an inquiry submitted by
Senator Michael McKell (District 25) and Senator David Hinkins (District 26)*

Summary

Sunrise Request

This sunrise review was conducted at the request of Senator McKell and Senator Hinkins. During the Utah Legislature's 2024 General Session, Senator Hinkins introduced Senate Bill 251, which proposed a mandatory registration system for individuals practicing as a life coach in Utah.¹ The bill was returned, and life coaching requirements were designated as an interim study item.² In conjunction with this interim study, Sens. McKell and Hinkins submitted a sunrise review request to OPLR about the potential occupational regulation of life coaching. OPLR reviewed the implications for market access and consumer safety based on research about life coaching, a scan of life coaches in Utah, and a survey of mental health therapist licensees in Utah.

Key Findings

Access: Given the broad nature of coaching, it is difficult to estimate the size and scope of this market. However, access does not seem an issue, either for consumers seeking help or for providers seeking to offer coaching services, because life coaching is wide-ranging and unregulated. Based on a scan of coaches in Utah, OPLR believes that life coaching is growing in part *because* of the unregulated nature of the profession, which enables consumers and practitioners to find and provide non-traditional services.

Safety: Life coaching doesn't pose a safety risk to consumers as a general practice. However, OPLR has identified several instances of harm related to life coaching, such as predatory business practices, pyramid schemes, and unlicensed mental health therapy. The focus of this report is the encroachment of coaches into the scope of practice of mental health therapists.

Recommendations

- OPLR recommends against creating a mandatory license or voluntary registry for life coaches, given difficulties defining its scope, lack of strong credentialing bodies, and concerns about inadvertently legitimizing questionable coaching practices.
- Strengthen the language in mental health practitioners' scope of practice to better delineate who is qualified to treat mental health conditions.
- Provide resources for proactive investigation and prosecution of bad actors in life coaching.

¹ [SB0251 Life Coaching Requirements](#)

² [Proposed 2024 Interim Study Items](#)

Context

This sunrise review was conducted at the request of Senator McKell and Senator Hinkins. During the Utah Legislature’s 2024 General Session, Senator Hinkins introduced Senate Bill 251, which proposed a mandatory registration system for individuals practicing as a life coach in Utah.³ The bill was returned to the Senate Rules Committee, and the Business & Labor Interim Committee proposed that life coaching requirements be designated as an interim study item.⁴ In conjunction with this interim study, Sens. McKell and Hinkins submitted a sunrise review request to OPLR to conduct further research on the potential occupational regulation of coaching. Conversations with the legislators provided further direction to focus on life coaching (over executive coaching) and encroachment on the regulated practice of mental health therapy.

Overview of Life Coaching

Life coaching emerged in the 1980s and 1990s with several high-profile coaches forming “coaching universities” and an accrediting organization.⁵ In the following decades, life coaching accelerated as it expanded into many different areas of focus. Currently, there are more than 70,000 coaches worldwide ([See Appendix 1.1](#)). The recent growth of life coaches has been particularly rapid, with an estimated 33% increase from 2015 to 2019 globally.⁶ Today, coaches offer support in almost every aspect of life, such as business coaching, executive coaching, dating coaching, and health coaching.⁷ The expertise of coaches varies widely, with some coaches boasting credentials as a therapist or holding a business degree from a top university, while others cite “life experiences” as their only credential ([See Appendix 3.2](#)).

Nationally, the most well-known life coaching accreditation body is the International Coaching Federation (ICF). The ICF offers several levels of coaching accreditation, with coaching-specific education requirements ranging from 60 hours to 200 hours. Members of the ICF tend to represent the better-trained and more legitimate side of the practitioner population, often working for large organizations.

The current scope of life coaching is undefined as it includes a very wide range of activities. The type of people receiving coaching also varies significantly. Consumers range from lower-income consumers who are “lacking direction” in life to high-level executives. The compensation for coaches spans a wide range, with some charging less than \$100/hr while others charge over \$1,000/hr.^{8,9}

³ [S.B. 251 Life Coaching Requirements](#)

⁴ [Proposed 2024 Interim Study Items](#)

⁵ [The gold standard in coaching: ICF - Organization history](#)

⁶ [2020 ICF global coaching study: Executive summary](#)

⁷ Areas identified by OPLR’s online sample of life coaching

⁸ [Coutu, D., & Kauffman, C.](#)

⁹ Language taken from OPLR sample of coaches

A few states have attempted legislation concerning life coaches but no state currently requires a license for life coaches¹⁰ ([See Appendix 1.2](#)). Attempted regulation has met with significant resistance from the ICF. However Montana created an administrative rule that adults with severe mental disabilities can obtain a Medicare waiver for a life coach if the coach follows listed guidelines.¹¹ In Utah, there is currently no regulation for life coaches.

Findings: Access

In a sense, coaching has emerged and grown precisely because it is unregulated and therefore provides access for both practitioners feeling constrained within traditional occupations, and consumers facing shortages of mainstream, licensed practitioners (e.g., mental health therapists) or seeking easy access to help for a variety of life circumstances. Some licensed mental health therapists nationally have reported that they coach in part to avoid the regulatory burden of occupational licensure in that profession.¹²

In Utah, it appears there are plenty of life coaches in the market. Given the ambiguous definition of coaching ([See Appendix 2.1](#)), it is difficult to delineate what practices are considered life coaching. To help understand this market, OPLR conducted a scan that identified over 200 coaches with an online presence in Utah.¹³ The majority of these coaches advertised that they are currently accepting clients, which suggests that access is not a significant barrier.

A related difficulty in assessing the availability of coaches is the wide variety of titles that coaches use to describe themselves. OPLR identified over 120 unique titles advertised by coaches within its sample of 200 ([See Appendix 2.2](#)). The proposed services also frequently overlap with services provided by other professions such as nutritionists, financial advisors, and therapists. A study conducted by the International Coaching Foundation (ICF) found that 93% of coaches offer additional services on the side (not coaching), furthering the notion that access is not a large barrier.¹⁴

Findings: Safety

To better understand whether life coaching services pose risks to consumers, OPLR 1) gathered responses from mental health therapist licensees and 2) examined its sample of life coaches with an online presence in Utah to verify if coaches are offering potentially harmful services. OPLR found broadly that coaching doesn't pose a risk in its general practice, but may if it strays into treatment of mental health conditions by providers that lack qualifications.

¹⁰ CO, MT, NH, OR, TX, VT, WI attempted legislation

¹¹ [Administrative rules of Montana](#)

¹² [Duane, D](#)

¹³ OPLR sample. [See appendix 3.2](#)

¹⁴ [Home and Community-Based Services for Adults with Severe and Disabling Mental Illness: Life Coach](#)

OPLR surveyed all mental health therapist licensees in the state to assess if they had seen clients who were harmed by a life coach. Of the respondents, approximately one-third reported that they had at least one therapy client who had reported harm by a life coach or similar practitioner¹⁵. The instances of harm cited by the therapist licensees included unqualified or mistaken diagnosis, improper management of suicidality, and dual relationships with clients (sometimes sexual). The reported licensing status of the coaches who had perpetrated the harm was largely individuals who had never been licensed as a therapist. Survey respondents likely over-represent those licensed therapists most concerned about the unlicensed practice of life coaching. Thus, the estimates of clients harmed by a life coach should be interpreted as a likely upper-bound estimate rather than a precise estimate ([See Appendix 3.1](#)).

To verify if coaches are offering mental health-related services, OPLR examined advertising claims of Utah life coaches ([See Appendix 3.2](#)). Of the life coaches assessed, ~40% potentially operate in the regulated mental health therapy space.¹⁶ These coaches make claims that they specialize in clients with mental health conditions or even go as far as claiming that they can ‘conquer’ a client’s mental health conditions.

An observation from OPLR’s online scan is that the level of formal training among life coaches is very wide. Some coaches have master’s degrees and many years of experience in their field, while others have no education or training beyond their own life experiences. Only ~10% of the life coaches claiming to address mental health conditions are licensed therapists ([See Appendix 3.2](#)). This is potentially harmful to consumers who may be taking advice about serious mental health conditions from unqualified and unlicensed coaches.

Recommendations

From a regulatory standpoint, coaching is less of a distinct occupation suitable for traditional occupational regulation than it is a business practice or an emerging variation on the provider-client relationship in general. Coaching principles could theoretically be applied in almost any personal or professional arena,¹⁷ thus making the practice difficult to distinguish from other professional activities ([See Appendix 4.1](#)). In contrast, the law can clearly distinguish the protected activities of a dentist, for example.

Additionally, the general practice of coaching itself does not appear to carry inherent risk to consumers above any other private transaction, thus making it difficult to justify the creation of a new state credential¹⁸ ([see Appendix 4.2](#)).

¹⁵ Many licensed practitioners had strong views on unlicensed life coaches, which may skew these estimates to overstate the prevalence and severity of harm. OPLR views these findings as a likely ‘ceiling’ on the range of potential harm to the public from life coaching.

¹⁶ OPLR scan of life coaches in Utah

¹⁷ [George, M](#)

¹⁸ [Utah Code Title 13-1b-302 Review criteria](#).

However, from OPLR's conversations with DOPL investigators, coaching is being used by some to skirt existing licensure, title, and advertising protections, to build rapport with potential targets of fraud, or as a cover for other illegal activity.¹⁹ The most harmful of these behaviors (fraud, abuse, unlicensed practice, etc.) are already unlawful acts that the state can investigate, prosecute, or enforce under existing laws without a new state credential for life coaching.

OPLR recommends taking the following steps to protect consumers from harm:

1. Licensing protection enhancements

Better protecting consumers from harmful coaching practices seems less an issue of introducing new regulations and more about investigating and prosecuting these cases where illegal acts are already defined in law.

This could be accomplished by 1) strengthening language in existing scope-of-practice laws, especially focused on mental health therapy in this case, and 2) providing more resources for proactive investigation of potential offenders.

First, scope-of-practice laws could be adjusted to target the majority of bad actors in life coaching who are targeting clients by advertising that they specialize in or treat people with mental health conditions.²⁰ Including language such as "advertising services that treat mental health conditions" and "communicating treatment plans" in the protected scope of therapists would help delineate for consumers which practitioners are qualified to treat mental health conditions ([See Appendix 4.3](#)).

Second, regulators within the Division of Professional Licensing (DOPL) typically respond to complaints from consumers. With additional resources, DOPL investigators could proactively educate or cite unlicensed coaches clearly offering services within a protected scope of practice. Such proactive enforcement would help protect consumers by removing some of the worst offenders while educating other practitioners—and the field more generally—of the ethical and legal boundaries they must observe.

2. Other recommendations considered

OPLR also considered the creation of a voluntary registry for life coaches. As a voluntary registry, there would be no requirement for a particular level of education or training. Instead, a registry would have a code of conduct that each coach would be required to abide by, allowing for investigation and removal of coaches for violations. The rationale of a registry is to attract the more ethical, credentialed, and legitimate actors as a signal to consumers.

This proposal was ultimately rejected. First, unqualified or unethical coaches could potentially use a voluntary registry to strengthen their marketing claims and gain legitimacy. A life coach

¹⁹ Per conversation with DOPL investigators, June 2024

²⁰ OPLR scan of life coaches in Utah, June-July 2024

could advertise that they are “state-registered” despite not being qualified to offer particular services, or even with an intent to deceive or defraud consumers.²¹ A second concern is the efficacy of a voluntary registry on the least ethical or competent actors. Individuals looking to evade government oversight are not likely to list their names on a government registry, having no effect on unscrupulous practitioners.

²¹ Per conversation with Consumer Federation of America

Appendix

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1. Context

1.1 Current Landscape of Industry Certifications

The most established certifying body for coaching is the International Coaching Federation (ICF), founded in 1995. ICF offers three credentials, each requiring an additional number of hours to become certified. ICF certifies different schools within the credential levels.²²

In addition to the ICF, there is a broad range of certifications offered for life coaches with significant variation in rigor and quality. These certifications range from informal weekend programs offered by an individual life coach to intensive, months-long certifications that require a significant monetary investment. The expertise of professionals in the coaching credential space varies widely as well. It is common to find highly-qualified individuals providing coaching services within large corporations while other minimally-qualified individuals advertise services to anyone who might be interested—all under the banner of ‘coaching’ ([See Appendix 3.2](#)).

1.2 State Regulation

State	Regulation Attempt	Description
Colorado	FAILED HB 20-1206	Provides an exemption for life coaches given they don't participate in mental health therapy
Montana	37.90.434	Admin rule states that adults with severe mental disabilities can receive a medicare waiver for a life coach if the coach follows the listed guidelines
New Hampshire		Sunrise process initiated but never gained traction
Oregon	FAILED HB 2493 2021	Voluntary registration with a professional conduct statement
Texas		ICF advocated against a measure that would redefine psychology
Wisconsin	FAILED AB 26 2021	Required alternative health care professionals to list qualifications and other details

²² [Credentials and standards](#)

2. Findings: Access

2.1 Lack of Agreement About Definition

It seems to be easier to say what coaching is not than what coaching is. There is disagreement and ambiguity in the coaching community about the specific definition of coaching. For example:

ICF definition: “partnering with clients in a thought-provoking and creative process that inspires them to maximize their personal and professional potential.”²³

Jarosz, 2016 definition: “Life coaching is a long-term efficient relationship that allows clients to maximize their potential.”²⁴

Based on OPLR research, it appears that anyone offering advice for money could be considered a coach. OPLR focused this review on coaches who offer therapy-adjacent services at the direction of the legislators requesting this review.

2.2 Ambiguous Titles and Terms

Coaches advertise their services using a plethora of titles. OPLR identified more than 100 titles or advertisement areas of expertise used by life coaches in the sample conducted of life coaches in Utah.

Titles & Advertisements of Expertise				
Abundance	Certified Circle Facilitator	Entrepreneur	Medical	Relationship Specialist
Academic	Certified Coach	Excess Coaching	Men's Life Coach	Religion
ADHD	Certified Couples Coach	Executive Career Coach	Mental Health Mentor	Single Life & Relationship Coach
ADHD & Neurodiversity Navigate College, Career, and Transitions	Certified Individual Relationship Coach	Executive Coach	Mentor	Soul-Sourced Consultant for Business Owners

²³ [ICF, the Gold Standard in Coaching: Read about ICF](#)

²⁴ [Jarosz, J](#)

Adult Parent Coach	Certified Integrative Nutrition Health Coach	Gay Man's Wellness Coach	Mid Life Women	Sound
Advanced Certified Life Coach	Certified Life Coach	Grief Coach	Mindfulness Coach	Spiritual Development
Andean Shaman	Certified Practitioner of Neuro-Linguistic Programming	Healer	Mindfulness Elemental Teacher	Superhuman Academy Certified Learning & Memory Coach
Anxiety Coach	Certified Registered Life Coach	Health and Wellness Coach	Mindset Coach	Teen Coach
Astrology	Co-Active Coach	Health Coach	Neuro-Linguistic Programming Coach	Teen Life Coach
Authenticity Coach	Coach	Healthy Relationship Educator	Neurodiverse	Therapist & Coach
Autoimmune Life Coach	Coach For Moms Of Young Kids	Health and Wellness	Nutrition and Lifestyle Coach	Thought Coach
Betrayal Coach	Coach Shaman	High Performance	Nutrition Coach	Timeline Therapy Practitioner
Betrayal Trauma Coach	Coach's Coach	Horse Coach	Organizing	Transformation Speaker & Coach
Boy Mom Coach	College Student Coach	Hypnotherapy Coach	Parent Coaching	Transformational Healing Coach
Brain Coach	Communications and Public Speaking	ICF And TRS Certified Coach	Physician Coach	Transformational Life Coaching and Clinical Hypnotherapist
Breath Coach	Confidence Coach	Intuitive Soul Coach	Professional Certified Life Coach	Trauma
Breathwork	Cosmetology	Law of Attraction Coach	Psychedelics	Trauma Healer

Business & Empowerment Coach	Cult Deprogrammer	LCS Certified Life Coach	Public Safety	Wealth Coach
Business Coach	Dating Coach	Leadership	Quantum Leap	Weight Loss Coach
Business Consulting	Diversity Coach	LGBTQ	Realtor	Wellness/Life Coach
Business Leadership Coach	Education K-12 Coach	Life Coach	Reike	Women's Empowerment and Confidence Coach
Business Mentor	Emotional Wellness	Louise Hay Certified Teacher and Coach	Relationship	YA Coach
Career Coach	Empath Mentor	Marriage	Relationship Alchemist	Young Men
Career Mentor	Empathic Therapist	Master Certified Coach	Relationship And Intimacy Coach	Youth Coach
Certified ADHD Coach	Energy	Master NLP Practitioner	Relationship Expert	Zoning

3. Findings: Consumer Harm

3.1 Licensed Therapist Survey

OPLR surveyed licensed therapists in the state of Utah to help assess the types of harm from life coaches on clients who later chose to see a licensed therapist. Therapists were asked a series of questions about the impact of coaching services on their therapy clients.

All licensed therapists in Utah were surveyed, with a 23% response rate. Of the therapists who responded, approximately one-third reported seeing clients who were harmed by a life coach. The top reported areas of harm were unqualified diagnosis, improper handling of client suicidality, financial harm, and harm to client relationships.

Some of the most pointed comments included:

“All 5 reported life coaches had them ‘deep dive’ into their trauma, which sent them into an emotional spiral and then did not provide them with any skills to cope with the emotional distress. 4 of them ended up being hospitalized with severe suicidal ideation.”

“Encouraged [client] to write ‘trauma story’ and then read to a room full of strangers, shared portions of written ‘trauma story’ in advertising without consent.”

“These clients took on labels/diagnoses (in this case ‘sex addict’) that were not sociologically accurate and negatively impacted (1) their intimate partner and familial relationships, (2) their relationship with their own sexuality, and (3) the way they viewed themselves in general.”

3.2 Online Sample of Life Coaches

Analysis of Utah Life Coaches

OPLR took a sample of ~220 individuals advertising themselves online as “life coaches” in the state of Utah. The analysis was conducted to assess the landscape and taxonomy of life coaches in Utah. Coaches were identified with targeted searches on several different platforms. Several search terms were used, almost all involving ‘life coach’ or similar. The searches were run through Google Search, LinkedIn, Instagram, Facebook, ICF Registry (a popular coaching certification), yelp, and Google Maps.

After obtaining the names of coaches, OPLR analyzed their online presence to group coaches according to services offered. OPLR used two general categories with seven subcategories to categorize the coaches. The first general category was ‘life coach’ and the subcategories were relationship, behavioral, goals, and financial. The second general category was ‘business’ with the subcategories career, business, and executive. Each coach was sorted into one of these categories using their online information. ‘Goals’ was the most ambiguous category. OPLR used this category as a “catch-all” for coaches who help others “be the best person you can be”, or “get what you want”, among other vague advertising.

Results from Sample

a) *Distribution of life coaches' advertised areas of expertise*

These results are based on each coach's advertisement of their services. Many coaches advertised multiple areas of expertise and were allocated to more than one category.

Category	% coaches expertise
Relationship	~24%
Behavioral	~22%
Goals	~60%
Financial	~5%
Career	~11%
Business	~19%
Executive	~24%

b) *Distribution of life coaches' level of education (all coaches)*

These results show coaches' advertised highest level of education, sorted from the least to the highest level of educational attainment.

Education Level	% of coaches
None shown	~21%
Certificate Course	~18%
Post-Secondary	~3%
4 Year Degree +	~26%
Relevant Degree	~25%
Licensed Therapist	~5%

c) *Distribution of life coaches' level of education (amongst in Behavioral and Relationship categories—potentially serving consumers with mental health conditions)*

Results suggest only ~10% of life coaches in the Behavioral & Relationship services category are licensed therapists.

Education Level	% of coaches
None shown	~18%
Cert. Course	~27%
Post-Secondary	~7%
4 Year Degree +	~18%
Relevant Degree	~22%
Therapist	~10%

4. Recommendations

4.1 Difficulty of Traditional Regulation

“The term ‘coaching’ has traditionally been used to describe someone who facilitates athletic performance, but its usage has expanded well beyond these boundaries to include performance across multiple domains of life. Staking their claims on such an expansive territory creates significant ambiguity and vagueness in the industry. The coaching industry does not have a unified body of knowledge, methods, or guidelines for practice; this imprecision allows for a wide range of services to fall under the category of coaching.”²⁵

4.2 OPLR Sunrise Review Criteria

“In conducting a sunrise review...the office [OPLR] shall consider the following criteria: (1) whether the regulation of the occupation is necessary to address a present, recognizable, and significant harm to the health, safety, or financial welfare of the public;...(3) the extent to which the proposed or existing regulation of the occupation protects against or diminishes the harm described...”²⁶

²⁵ [George, Molly](#)

²⁶ [Utah Code Title 13-1b-302 Review criteria.](#)

4.3 Strengthening Scope of Practice

OPLR examined other jurisdictions' protected scope of mental health therapy to contemplate how to best prevent consumers from being harmed by unqualified practitioners. Canada was especially considered as they protect the “communication of a diagnosis.” OPLR believes that a similar protection would be beneficial to signal the protected scope of mental health therapists.

The following excerpt from the report “[Adjusting the Balance: A Review of the Regulated Health Professions Act](#)” by the Ontario Health Professions Regulatory Advisory Council (2001) explains the rationale for protecting the act of “communicating” a diagnosis:

“Communicating a diagnosis as expressed above does not include assessing or labeling the signs and symptoms a person may present with. The underlying cause of the symptoms, if it is a disease or disorder, is what must be communicated to the patient. A diagnosis involves the ability to identify a disease or disorder by drawing a conclusion based upon certain knowledge and skill. It is the conclusion itself which is the diagnosis and not the procedures upon which the conclusion is based. The act of communicating a diagnosis is clearly not the same as the act of making a diagnosis. However, the controlled act of communicating a diagnosis requires that it is foreseeable a patient would rely on the diagnosis, perhaps to the extent of subjecting him/herself to invasive treatment. Thus it is understood that the performance of the controlled act would require the authorized health professional to have the competencies to also make a diagnosis, or to validate a diagnosis made by another health professional. In other words, to label or validate with some confidence the disease or disorder causing the symptoms, health professionals communicating a diagnosis to someone who is going to rely on this information must engage themselves in the cognitive process of reviewing the assessment findings and drawing a conclusion based on the body of knowledge and science of their profession.”

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