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To: Board Members Date: May 9, 2024

From: Steve Sodergren

Executive Officer

Subject: Acceptance of Association of Marital and Family Therapist

Regulatory Board National Examination

To become a Licensed Marriage and Family Therapist (LMFT) in California, passing the LMFT clinical exam is mandatory. This exam is developed by the Board with the assistance of DCA's Offices of Professional Examination Services (OPES). In contrast, all other states require passing the Association of Marital and Family Therapy Regulatory Board's (AMFTRB) clinical examination for LMFT licensure.

While the Board has already adopted national clinical examinations for Licensed Clinical Social Workers (LCSW) and Licensed Professional Clinical Counselors (LPCC) it has yet to adopt the AMFTRB clinical examination for LMFT licensure. Goal 2.3 of the Board's 2022-2026 Strategic Plan seeks to explore the feasibility of adopting the AMFTRB national exam for LMFT licensure. The discussion surrounding the adoption of the AMFTRB clinical examination has been a consistent topic of the Board, but it has recently received increased attention from stakeholders. This heightened interest is largely attributed to the growing utilization of telehealth services and the subsequent need for portability in licensing requirements.

HISTORY

2009

In February of 2009 the Board established an Examination Review Committee to conduct a holistic review of the Board's exam program. Part of the committee's work was to consider the use of the Association of Marital and Family Therapist Regulatory Board (AMFTRB) national examination. The Board engaged the services of Applied Measurement Services, LLC (AMS) to assess the AMFRTB national exam. AMS determined that the AMFTRB national examination met professional and technical guidelines for examination validation but noted some technical issues relating to examination candidate volume and test administration. In 2013 the Board decided not to pursue the national examination.

2015

During the February 2015 Board Meeting, the Board revisited the topic of evaluating the AMFTRB national examination. As a result, the Board directed staff to conduct an

evaluation of the national examination. At that time the Board and OPES were also working towards implementing the examination restructure and the transition to the national clinical exam for LCSWs, so the evaluation of the AMFTRB was delayed.

2016-2017

In November 2016 and January 2017 Board staff met with the OPES to discuss evaluating the AMFTRB national examination. OPES staff indicated that the evaluation of this examination was possible, but that it would be more appropriate after the conclusion of the Board's occupational analysis of Marriage and Family Therapist practice which was to occur in 2019. The evaluation was further delayed because of the pandemic and upon the recommendation that the evaluation would be more comprehensive once the AMFRTB completed their own occupational analysis in 2021. This occupational analysis was utilized to establish the current AMFTRB national examination's content and questions.

2022-Present

During the November 2022 meeting the Board again discussed the possible use of the AMFTRB national examination for California licensure. The Board decided to decline use of AMFTRB clinical exam for California licensure and directed staff to continue working with OPES to address all concerns brought up in closed and open meeting sessions. Since then, the Board has heard a presentation by Lois Paff Bergen, Executive Director of AMFTRB and conducted an additional closed session meeting to discuss the AMFTRB exam in February 2024.

OPES REVIEW AND AMFTRB RESPONSE

OPES completed its review of the AMFTRB clinical examination and presented their findings during the November 2022 Board meeting closed session. This review aimed to assess the exam's compliance with professional guidelines and technical standards for licensure examinations. OPES evaluated various components, including occupational analysis, examination development, passing scores, test administration, and security procedures. The review concluded that the procedures generally met the required standards but noted differences between the AMFTRB national examination and California's LMFT written clinical examination mainly involving measurement scope and administration.

Measurement Differences

OPES noted that the AMFTRB national examination tests broad competencies related to practice, whereas California's LMFT examination test competencies specific to practice within California. AMFTRB acknowledges the differences in measurement scope and believes that the upcoming 2024-2025 Role Delineation/Job Task Analysis Study will assist in lessening the differences. This study is the basic underlining assessment of what LMFTs do as clinicians and is the basis for development of the national exams. It was acknowledged the trend nationally was more in line with the common practices in California and they expect that this will influence a change in examination content and measurement scope. California licensees have been invited to, and have actively participated in, the study and development of the AMFTRB exam.

Administrative Differences

Additionally, there was a concern from Board staff about the administration of the examination in terms of accessibility to testing. The AMFTRB clinical exam is offered for one week every month, unlike the Board's clinical exam which is offered continuously. Also, the Board's examination population will nearly double the number of AFMTRB exam candidates that AMFTRB currently work with. Through conversations with AMFTRB administrators, it is apparent that they are taking proactive steps in assessing how they would handle a possible increase in exam candidates should the Board adopt the exam.

Standardized Testing Concerns

During the November 2022 discussion of the AMFRTB examination, the concern was raised regarding the possible biases in standardized exams and how that may inadvertently disadvantage certain test takers. AMFTRB currently collects voluntary demographic data from their exam candidates and are actively using this data to perform differential item function analysis on their exam to identify bias. They are also exploring using alternative methods of evaluation.

CAMFT SUPPORT

The California Association of Marriage and Family Therapist (CAMFT), the organization which represents approximately 36,000 members, is in support of the adoption of the AMFTRB examination for California licensure. CAMFT believes this move would address several key issues faced by marriage and family therapists (MFTs) in California. These include enhancing license portability for California MFTs, especially in the context of telehealth expansion, ensuring consumer protection, reducing costs and hurdles for MFTs seeking licensure in multiple jurisdictions, and facilitating their federal advocacy efforts. They believe that adopting the AMFTRB examination will also assist in aligning California with national standards and eliminate inconsistencies.

NEXT STEPS

If the Board decides to adopt the AMFTRB examination for licensure, implementing this change will take time. Before transitioning to the AMFTRB examination, the Board staff will need to take several steps:

- Collaborate with DCA Legal to determine the statute and regulation changes necessary to recognize the AMFTRB examination for California licensure and obtain Board approval of the required changes.
- Pursue statute and/or regulation changes to officially adopt the AMFTRB examination for California licensure.
- Collaborate with AMFTRB representatives to ensure that California candidates will have adequate access to the examinations.

- Design and implement changes to the BreEZe system for eligibility information and score reports to maintain the Board's automated system.
- Ensure that California candidates are well-informed about the transition to the AMFTRB national examination.

Staff Recommendation

Staff recommends acceptance of the AMFTRB national examination for licensure in California.

Recommendation

Conduct an open discussion as to whether the Board will accept the AMFRTB national examination for licensure. If so, direct staff to complete all the following steps before requesting final Board approval to run regulatory and/or legislative amendments to formally accept the AMFTRB national examination by the Board:

- Work with legal counsel to draft legislative or regulatory language necessary to accept the AMFTRB national examination for licensure.
- Collaborate with AMFTRB on addressing examination content and measurement scope concerns.
- Collaborate with AMFRTB on addressing accessibility for testing candidates to ensure exam candidates are not adversely affected by the transition to the national examination.
- Work with DCA's Office of Information Services to ensure an automated system is in place for transferring examination eligibilities and test scores.