

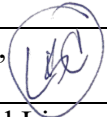


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OFFICE OF PROFESSIONAL LICENSURE AND CERTIFICATION
POLICY GUIDANCE: PLC 313 REQUIREMENTS FOR
MARRIAGE AND FAMILY THERAPISTS

Reference Number:	SFY 2024-02
Authorized by:	Lindsey B. Courtney, Executive Director 
Division/Board/Council/Commission:	Office of Professional Licensure and Certification
Effective Date:	Immediately
Subject:	Licensure guidance
Description:	Guidance concerning hours required by jurisdictions to qualify for licensure as a MFT by endorsement under Plc 313

OVERVIEW

The Office of Professional Licensure and Certification (OPLC) is the state agency charged with establishing criteria for individuals to obtain a license in New Hampshire by endorsement pursuant to RSA 310:17. That statute provides “the office shall issue licenses to professionals who present evidence of an active license in good standing from another jurisdiction, in accordance with rules adopted by the executive director under RSA 541-A, provide that the jurisdiction’s licensing requirements are substantially similar to New Hampshire’s licensing requirements” The Office adopted interim rules establishing such criteria for licensure as a Marriage and Family Therapist—those rules were effective October 15, 2023. Under those rules, a state must require, among other things, that licensees “[c]omplete a minimum of 2,500 hours or 2 full years of postgraduate experience,” to be considered to have “substantially similar” requirements to New Hampshire’s requirements. Plc 313.39.

Several states require licensees to have a certain number of hours with direct patient contact, but do not specify the total number of hours of postgraduate experience licensees must have, raising the question of whether such states may be “substantially similar” to New Hampshire’s requirements under Plc 313.39. As the agency charged with administering its statute and rules, the OPLC’s interpretation of these statutes and rules control, unless and until a court rules differently. See *In re Town of Seabrook*, 163 N.H. 635 (2012) (“[I]t is well established in our case law that an interpretation of a statute by the agency charged with its administration is entitled to deference.”). This guidance is being issued to clarify the OPLC’s interpretation of Plc 313.39, as it relates to the postgraduate experience required.

The New Hampshire Board of Mental Health Practice rules require that a licensee complete 3000 hours of postgraduate experience, 1000 hours of which must be “face-to-face” contact. Mhp 306.07 (2015). After review, and based on Mhp 306.07, the OPLC determines that 1,000 hours of direct patient contact is equivalent to the 2,500 hours of total postgraduate experience required by Plc 313.39. Accordingly, states that require at least 1,000 hours of direct patient contact, or 2,500

total hours of postgraduate experience, shall be deemed to be substantially similar to New Hampshire's licensing requirements.

SUMMARY

Until a court rules differently or the Office modifies its rule, the Office concludes that states that require at least 1,000 hours of direct patient contact, or 2,500 total hours of postgraduate experience, shall be deemed to be substantially similar to New Hampshire's licensing requirements pursuant to Plc 313.39.