

Report Highlights

Why DLA Performed This Audit

The audit was performed to determine if there is a continued need for the board and if its termination date should be extended. The board is set to sunset on June 30, 2026, and will have one year from that date to conclude its administrative operations.

What the Legislative Auditor Recommends

1. The Office of the Governor, Boards and Commissions director should work with the board to identify potential applicants to fill the public member board seats in a timely manner.
2. The board should ensure the renewal licensing application form is sufficient to monitor compliance with teletherapy-related continuing education requirements.

A Sunset Review of the Department of Commerce, Community, and Economic Development, Board of Marital and Family Therapy (board)

May 9, 2025

Audit Control Number 08-20143-25

REPORT CONCLUSIONS

The audit concluded that the board served the public's interest by conducting meetings in an effective manner, amending regulations as needed, and generally licensing marital and family therapists in compliance with state law. The audit also found that a public board member seat had been vacant for 32 months as of March 2025.

In accordance with AS 08.03.010(c)(11), the board is scheduled to terminate on June 30, 2026. We recommend the legislature extend the board's termination date eight years, to June 30, 2034.

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ALASKA STATE LEGISLATURE

LEGISLATIVE BUDGET AND AUDIT COMMITTEE

Division of Legislative Audit



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July 2, 2025

Members of the Legislative Budget
and Audit Committee:

In accordance with the provisions of Title 24 and Title 44 of the Alaska Statutes (sunset legislation), we have reviewed the activities of the Board of Marital and Family Therapy, and the attached report is submitted for your review.

DEPARTMENT OF COMMERCE, COMMUNITY, AND ECONOMIC DEVELOPMENT BOARD OF MARITAL AND FAMILY THERAPY SUNSET REVIEW

May 9, 2025

Audit Control Number
08-20143-25

The audit was conducted as required by AS 44.66.050(a). Per AS 08.03.010(c)(11), the Board of Marital and Family Therapy is scheduled to terminate on June 30, 2026. We recommend that the Legislature extend the board's termination date eight years to June 30, 2034.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Fieldwork procedures utilized in the course of developing the findings and recommendations presented in this report are discussed in the Objectives, Scope, and Methodology section of the report.

A handwritten signature in blue ink, appearing to read "Kris Curtis".

Kris Curtis, CPA, CISA
Legislative Auditor

ABBREVIATIONS

AAC	Alaska Administrative Code
AAMFT	American Association for Marriage and Family Therapy
ACN	Audit Control Number
AMFTRB	Association of Marriage and Family Therapy Regulatory Boards
AS	Alaska Statute
board	Board of Marital and Family Therapy
CISA	Certified Information Systems Auditor
CPA	Certified Public Accountant
DCBPL	Division of Corporations, Business and Professional Licensing
DLA	Division of Legislative Audit
FY	Fiscal Year
HB	House Bill

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ORGANIZATION AND FUNCTION

Board of Marital and Family Therapy (board)

The board consists of five members appointed by the governor, including two public members and three licensed marital and family therapists. Board members, as of March 2025, are listed in Exhibit 1.

Alaska Statute 08.63.900 defines the practice of marital and family therapy as the “diagnosis and treatment of mental and emotional disorders that are referenced in the standard diagnostic nomenclature for marital and family therapy, whether cognitive, affective, or behavioral, within the context of human relationships, particularly marital and family systems.”

Per AS 08.63.050, the duties of the board include:

1. Establishing objective examination requirements and training and education requirements for persons who apply for a license to practice marital and family therapy;
2. Examining applicants and issuing licenses to qualified applicants;
3. Establishing continuing education requirements for license renewal;
4. Adopting a code of ethical practice for marital and family therapy;
5. Holding hearings and ordering the disciplinary sanction of a person who violates board related statutes or regulations;
6. Ensuring that licensees are aware of the requirements for reporting child abuse or neglect as mandated by AS 47.17.020;

Exhibit 1

Board of Marital and Family Therapy Members as of March 31, 2025

Noah Shields, Chair
<i>Licensed Marital and Family Therapist</i>
Shawnmarie Carpenter
<i>Licensed Marital and Family Therapist</i>
Chantal Cohen
<i>Licensed Marital and Family Therapist</i>
Kayla Green
<i>Public Member</i>
Vacant
<i>Public Member</i>

Source: Office of the Governor, Boards and Commissions website.

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-
7. Establishing standards for supervisors and supervision; and
 8. Adopting regulations necessary to carry out its duties.

**Department of Commerce,
Community, and Economic
Development's Division
of Corporations, Business
and Professional Licensing
(DCBPL)**

DCBPL staff provides administrative and investigative assistance to the board. Administrative assistance includes budgetary services and functions such as collecting fees, maintaining files, receiving application forms, publishing notices for meetings and examinations, and assisting with board regulations.

Alaska Statute 08.01.087 gives DCBPL authority to act on its own initiative or in response to a complaint. DCBPL may:

1. Conduct an investigation to determine whether a person has violated a law.
2. Bring an action in Superior Court to enjoin the act.
3. Examine or have examined the books and records of a person whose business activities require a business license or licensure by a board listed in AS 08.01.010, or whose occupation is listed in AS 08.01.010.
4. Issue subpoenas for the attendance of witnesses and the production of records.

Alaska Statute 08.01.065 requires the department to adopt regulations that establish the amount and manner of payment of application, examination, license, investigation, registration, and other fees as appropriate.

REPORT

CONCLUSIONS

In developing our conclusion regarding whether the Board of Marital and Family Therapy's (board) termination date should be extended, its operations were evaluated using the 11 factors set out in AS 44.66.050(c), which are included as Appendix A to this report. Under the State's "sunset" law, these factors are to be considered in assessing whether an entity has demonstrated a public policy need for continuing operations.

The audit concluded that the board served the public's interest by conducting meetings in an effective manner, amending regulations as needed, and generally licensing marital and family therapists in compliance with state law. The audit also found that a public board member seat had been vacant for 32 months as of March 2025.

In accordance with AS 08.03.010(c)(11), the board is scheduled to terminate on June 30, 2026. We recommend the legislature extend the board's termination date eight years to June 30, 2034.

Detailed report conclusions are as follows.

The board conducted its meetings effectively and did not duplicate the efforts of other entities.

The board met 10 times from July 2021 through January 2025. A review of five board meetings found that meetings were appropriately public noticed and generally allotted time for public comment. Although quorum was met for the five meetings reviewed, auditors became aware that a different board meeting scheduled for August 19, 2024, was canceled due to a lack of quorum. A public board member vacancy contributed to the loss of quorum. (See Recommendation 1)

To determine whether the board's activities duplicate those of another agency, auditors reviewed the activities of two marital and family therapy related professional organizations - the Association of Marriage and Family Therapy Regulatory Boards (AMFTRB) and the American Association for Marriage and Family Therapy (AAMFT). AMFTRB administers the national licensing exam that applicants must pass in order to be licensed and provides a platform

for state regulatory boards to share information and best practices. AAMFT develops standards for graduate education and training, clinical supervision, professional ethics, and the clinical practice of marriage and family therapy. It also offers training opportunities. The audit concluded that the services offered by the two national organizations do not duplicate the board's licensure and other regulatory responsibilities.

The board recommended statutory changes and amended regulations.

During the audit period, the board issued letters of support for House Bill (HB) 314 and Senate Bill 225, which proposed removing investigation, hearing, and legal expenses from the costs required to be covered by professional license fees. These two bills did not pass during the audit period. The board also recommended the passage of HB 126 which clarified the coursework and supervision requirements for licensure. The bill also granted the board discretion to extend an associate license¹ beyond the four-year limit in cases of extenuating circumstances. HB 126 was signed into law August 2024.

The board amended its regulations to incorporate statutory changes resulting from HB 126. The board also amended regulations to establish standards and create a temporary military courtesy license to allow qualified, active-duty military members and spouses to practice as a marital and family therapist. This change expedited the licensing process for military members and spouses.

Board related cases were consistently investigated.

A total of 14 board related cases were open or opened from July 2021 through January 2025. The audit identified that four of the cases were open for over 180 days during the audit period. Auditors reviewed two of the four cases that were open for over 180 days and did not identify unjustified periods of inactivity.

¹ Per AS 08.63.110, an associate license is for the supervised practice of marital and family therapy issued to a person who met the statutory requirements. An associate can only practice under the direct supervision of a board-authorized supervisor.

Board licenses were issued in compliance with statutes and regulations; except the renewal licensing application form did not disclose whether an applicant was engaged in teletherapy practice.

Exhibit 2 shows that as of January 2025, there was a total of 116 active licenses.

During the audit period, the board worked with Division of Corporations, Business and Professional Licensing (DCBPL) management to implement a change to DCBPL's public facing database to identify marital and family therapy board-authorized supervisors. This change helped associate therapists identify potential supervisors in a more efficient manner.

Exhibit 2

Board of Marital and Family Therapy Licensing Activity FY 22 through January 31, 2025				
	Newly Issued (Exclusive of Renewals)			Total Active as of January 31, 2025
	FY 22	FY 23	FY 24	
Marital And Family Therapist License	22	16	20	102
Marital And Family Therapist Temporary License	0	1	0	0
Marital And Family Therapy Associate	2	5	3	14
Total	24	22	23	116

Source: Compiled from the DCBPL licensing database.

Auditors tested a sample of eight new licenses issued during the audit period and found that all licenses were issued in accordance with statutes and regulations. Testing a sample of three renewal applications found that the board did not require applicants to disclose whether the licensee was engaged in teletherapy. Consequently, there was no way to evaluate compliance with the continuing education requirements for marital and family therapists that are engaged in teletherapy. (See Recommendation 2)

Except for the inability to monitor continuing education requirements, DCBPL staff audited continuing education in a timely manner.

DCBPL management, in consultation with the board, decreased licensing fees to address the board's surplus.

The board's schedule of revenues and expenditures for FY 22 through January 2025 is shown in Exhibit 3. The board primarily receives its revenue from licensing and renewal fees. Renewals are conducted on a biennial basis, creating a two-year cycle in board revenues. During the audit period, the board was allocated \$54,609 of general funds to replace revenue lost due to the pandemic related license fee freeze mandated by the governor. As of January 2025, the board had a surplus of \$196,835.

During FY 24, DCBPL staff reviewed the level of fees in relation to the board's surplus. DCBPL management, in consultation with the board, concluded that the board's fees were too high, and adopted regulations effective September 12, 2024, to decrease three licensing fees. The board's schedule of fees from July 2021 through January 2025 is shown in Exhibit 4 on page 8.

Exhibit 3

**Board of Marital and Family Therapy
Schedule of Revenues and Expenditures
FY 22 through January 31, 2025
(Unaudited)**

	FY 22	FY 23	FY 24	July 1, 2024 – January 31, 2025
Revenues				
Licensing Fees	\$ 38,880	\$125,100	\$ 33,128	\$ 83,725
General Funds Received	53,761	848	-	-
Other Sources	-	-	-	-
Total Revenues	<u>92,641</u>	<u>125,948</u>	<u>33,128</u>	<u>83,725</u>
Direct Expenditures				
Personal Services	21,915	51,224	28,366	42,055
Travel	-	5,775	-	1,915
Services	1,736	703	1,550	-
Commodities	-	-	-	-
Total Direct Expenditures	<u>23,651</u>	<u>57,702</u>	<u>29,916</u>	<u>43,970</u>
Indirect Expenditures	<u>12,353</u>	<u>19,907</u>	<u>13,629</u>	<u>6,815*</u>
Total Expenditures	<u>36,004</u>	<u>77,609</u>	<u>43,545</u>	<u>50,785</u>
Annual Surplus (Deficit)	56,637	48,339	(10,417)	32,940
Beginning Cumulative Surplus (Deficit)	<u>69,336</u>	<u>125,973</u>	<u>174,312</u>	<u>163,895</u>
Ending Cumulative Surplus (Deficit)	<u>\$ 125,973</u>	<u>\$ 174,312</u>	<u>\$ 163,895</u>	<u>\$ 196,835</u>

Source: DCBPL management.

*Estimated based on the indirect allocation for July 1, 2024, through December 31, 2024.

Exhibit 4

**Board of Marital and Family Therapy
License Fees
July 1, 2021, through January 31, 2025**

	Fee Amount	
	July 1, 2021 – September 11, 2024	September 12, 2024 – January 31, 2025
Nonrefundable application fee for:		
Initial license	\$ 350	\$ 350
Emergency courtesy license	50	50
License fee for all or part of the initial biennial license period	1,250	750
Biennial license renewal fee	1,250	750
Four-year associate license fee for supervised practice	600	350
Temporary license fee	300	300
Emergency courtesy license fee	300	300

Source: DCBPL Regulations

FINDINGS AND RECOMMENDATIONS

The prior 2017 sunset audit made no recommendations.

This sunset audit makes two new recommendations.

Recommendation 1:

The Boards and Commissions director should work with the Board of Marital and Family Therapy (board) to identify potential applicants to fill the vacant public member board seat in a timely manner.

As of March 31, 2025, one of the two public board member seats had been vacant for 32 months.

Per AS 08.63.010, the board is statutorily required to consist of five members. These members are appointed by the governor and approved by the legislature. Three of the five board members must be licensed in the state as marital and family therapists and two must be public members. The Office of the Governor, Boards and Commissions director is responsible for actively recruiting, interviewing, and vetting board applicants.

The Boards and Commissions director stated that the vacant public member seat was difficult to fill due to a general lack of interest in serving on the board. Vacant public member positions can hinder the board's ability to conduct business with the necessary consumer and public safety perspectives and could potentially lead to inefficiencies, such as canceled meetings due to a lack of quorum. The audit noted that August 19, 2024, meeting was canceled due to a lack of quorum.

We recommend the Boards and Commissions director work with the board to identify potential applicants to fill the board seat in a timely manner.

Recommendation 2:

The board should ensure the renewal licensing application form is sufficient to monitor compliance with teletherapy-related continuing education requirements.

As part of the license renewal process, marital and family therapist license applicants were not required to disclose whether they were engaged in teletherapy practice.

According to AS 08.63.050(a)(2), the board shall examine applicants and issue licenses to those applicants it finds qualified. Per 12 AAC 19.300(c), licensees who engage in teletherapy are required to complete two hours of continuing education specifically related to teletherapy practice, including teletherapy ethics.

According to Division of Corporations, Business and Professional Licensing management, the need to track licensees engaging in teletherapy was not considered. The failure to identify whether licensees practice teletherapy has hindered the division and board's ability to effectively monitor compliance with continuing education requirements, and increased the risk of noncompliance with statutes and regulations.

We recommend the board ensure the renewal licensing application form is sufficient to monitor compliance with teletherapy-related continuing education requirements.

OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Title 24 and Title 44 of the Alaska Statutes, we have reviewed the activities of the Board of Marital and Family Therapy (board) to determine if there is a demonstrated public need for its continued existence.

As required by AS 44.66.050(a), this report shall be considered by the committee of reference during the legislative oversight process in determining whether the board should be reestablished. Currently, under AS 08.03.010(c)(11), the board will terminate on June 30, 2026, and will have one year from that date to conclude its administrative operations.

Objectives

The two central, interrelated objectives of our report are to determine:

1. If the termination date of the board should be extended.
2. If the board is operating in the public's interest.

Scope

The assessment of board operations and performance was based on criteria set out in AS 44.66.050(c) which relates to the determination of a demonstrated public need for the board. We reviewed the board's activities from July 1, 2021, through January 31, 2025. Financial information is presented, unaudited from July 1, 2021, through January 31, 2025.

Methodology

During the course of our audit, we reviewed and evaluated the following:

- The prior sunset audit report (ACN 08-20103-17) to identify issues affecting the board and to identify prior sunset audit recommendations.
- Applicable statutes and regulations to identify board functions and responsibilities, determine whether statutory or regulatory changes

enhanced or impeded board activities, and help ascertain if the board operated in the public interest.

- The State's Online Public Notices System to verify board meetings were adequately public noticed in compliance with state law.
- Expenditures, revenues, and fee levels for the board to determine whether fee levels covered the costs of operations.
- Board meeting minutes and annual reports to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, and whether board vacancies impeded operations.
- Board investigation data to assess the efficiency of the investigative process.
- Various Alaska news websites to identify complaints against the board or other board related concerns.
- Various websites containing information for potential duplication of board activities.
- Continuing education audits to verify the Division of Corporations, Business and Professional Licensing (DCBPL) monitored compliance with requirements.
- DCBPL fee analysis support to gain an understanding of the methodology used to implement the most recent license fee decrease.

Internal controls over the licensing and investigation processes were assessed to determine if controls were properly designed and implemented. Additionally, to identify and evaluate board activities, we conducted interviews with state agency staff and board members. Specific areas of inquiry included: board operations, statutory duties, regulations, duplication of effort, fee levels, board and

staff vacancies, and complaints against the board and/or its board members.

The audit utilized the following samples:

- A judgmental sample of five of 10 board meetings held from July 1, 2021, to January 31, 2025, was reviewed to gain an understanding of board proceedings and activities, the nature and extent of public input, whether a quorum was maintained, whether the meetings were public noticed, and whether board vacancies impeded operations. Test results were not projected to the population.
- Two of four board related cases open 180 days or longer between July 1, 2021, through January 31, 2025, were reviewed for unjustified periods of inactivity. One investigation with the most days open and one complaint were judgmentally selected to gain assurance regarding the efficiency of the investigative process. Test results were not projected to the population.
- A random sample of 11 license applications was selected from a total of 116 license applications. Eight applications were chosen from the 19 new licenses issued between July 1, 2021, and January 31, 2025. The remaining three applications were renewal license applications selected from the 97 renewals processed by DCBPL staff during the audit period prior to January 1, 2025. These random samples were tested to assess internal controls and compliance with statutes and regulations. The sample size was based on low control risk, on moderate inherent risk, and moderate audit risk. Test results were not projected to the population.

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APPENDIX SUMMARY

Appendix A provides the sunset criteria used in developing the conclusions regarding whether the Board of Marital and Family Therapy termination date should be extended.

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APPENDIX A

Analysis of Public Need Criteria AS 44.66.050(c)

A determination as to whether a board or commission has demonstrated a public need for its continued existence must take into consideration the following factors:

1. the extent to which the board or commission has operated in the public interest;
2. the extent to which the operation of the board or commission has been impeded or enhanced by existing statutes, procedures, and practices that it has adopted, and any other matter, including budgetary, resource, and personnel matters;
3. the extent to which the board or commission has recommended statutory changes that are generally of benefit to the public interest;
4. the extent to which the board or commission has encouraged interested persons to report to it concerning the effect of its regulations and decisions on the effectiveness of service, economy of service, and availability of service that it has provided;
5. the extent to which the board or commission has encouraged public participation in the making of its regulations and decisions;
6. the efficiency with which public inquiries or complaints regarding the activities of the board or commission filed with it, with the department to which a board or commission is administratively assigned, or with the office of victims' rights or the office of the ombudsman have been processed and resolved;
7. the extent to which a board or commission that regulates entry into an occupation or profession has presented qualified applicants to serve the public;

APPENDIX A

(Continued)

8. the extent to which state personnel practices, including affirmative action requirements, have been complied with by the board or commission in its own activities and in the area of activity or interest;
9. the extent to which statutory, regulatory, budgetary, or other changes are necessary to enable the board or commission to better serve the interests of the public and to comply with the factors enumerated in this subsection;
10. the extent to which the board or commission has effectively attained its objectives and purposes and the efficiency with which the board or commission has operated; and
11. the extent to which the board or commission duplicates the activities of another governmental agency or the private sector.

Agency Response from the Office of the Governor



OFFICE OF THE GOVERNOR
Governor Mike Dunleavy
STATE OF ALASKA

October 16, 2025

RECEIVED

OCT 16 2025

LEGISLATIVE AUDIT

Ms. Kris Curtis
Legislative Auditor
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811-3300

Re: Confidential preliminary audit, Department of Commerce, Community, and Economic Development, Board of Marital and Family Therapy

Dear Ms. Curtis,

Recommendation 1: The Boards and Commissions director should work with the Board of Marital and Family Therapy (board) to identify potential applicants to fill the vacant public member board seat in a timely manner.

The Office of the Governor concurs with this recommendation. Vacancies are filled promptly once an applicant satisfies both the board's statutory qualifications and the Governor's independent standard for public service. No application reviewed during the audit period cleared that combined threshold. Opportunities to serve remain publicly posted; the appointment will be made when a fully qualified candidate applies.

Thank you for the opportunity to respond.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jordan Shilling".

Jordan Shilling, Director
Boards and Commissions

cc: Cheri Lowenstein, Administrative Director, Office of the Governor

550 West 7th Avenue, Suite 1700, Anchorage, AK 99501

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Agency Response from the Department of Commerce, Community, and Economic Development



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Commerce, Community, and Economic Development

OFFICE OF THE COMMISSIONER
Julie Sande, Commissioner

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Juneau, Alaska 99811-0800
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October 2, 2025

Kris Curtis
Legislative Auditor
Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811

RECEIVED
OCT 03 2025
LEGISLATIVE AUDIT

Dear Ms. Curtis:

Thank you for the September 12, 2025, Confidential Preliminary Report, Department of Commerce, Community, and Economic Development (DCCED), Board of Marital and Family Therapy (board) Sunset Review. I concur with all five conclusions and both recommendations. Please see the following comments regarding the recommendations:

Recommendation #1: The Boards and Commissioner director should work with the Board of Marital and Family Therapy (board) to identify potential applicants to fill the vacant public board seat in a timely manner.

The department will continue to support the governor's office in filling vacant board seats, as appropriate.

Recommendation #2: The board should ensure the renewal licensing application form is sufficient to monitor compliance with teletherapy-related continuing education requirements.

The Division of Corporations, Business and Professional Licensing has updated the license renewal application to resolve this issue.

Again, thank you for the opportunity for the department to provide input on this matter. If you have any questions, please feel free to contact me.

Sincerely,

DocuSigned by:
A handwritten signature in blue ink, appearing to read "Julie Sande".
Julie Sande
Commissioner

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Agency Response from the Board of Marital and Family Therapy

TRUULI PEAK COUNSELING, INC
NOAH SHIELDS, LMFT-S LPC-S RPT

October 2, 2025

Division of Legislative Audit
P.O. Box 113300
Juneau, AK 99811-3300

Re: Response to Audit Report

RECEIVED

OCT 07 2025

LEGISLATIVE AUDIT

On behalf of the Board, I would like to thank the Division of Legislative Audit for its thorough review and report. I have carefully considered the conclusions, findings, and recommendations presented and are in agreement with them.

I concur with the audit's conclusions that the Board conducted its meetings effectively and without duplicating the efforts of other entities. I also agree that the Board has recommended statutory changes and amended regulations where necessary, consistently investigated board-related cases, issued licenses in compliance with statutes and regulations, and further recognize the positive step taken by DCBPL management, in consultation with the Board, to reduce licensing fees to address the Board's surplus. I acknowledge the report's finding that the renewal licensing application form did not disclose whether an applicant was engaged in teletherapy practice.

With respect to the findings and recommendations, I agree that the Board should ensure the renewal licensing application form is sufficient to monitor compliance with teletherapy-related continuing education requirements. Additionally, I agree that the Board would benefit from having the currently vacant public member seat filled. I acknowledge the importance of both recommendations; however, the Board is only able to directly address the first recommendation. In regard to the teletherapy-related recommendation, the Board will review and amend the relevant regulations and, where necessary, update the renewal licensing application form at our next scheduled board meeting to ensure applicants are in full compliance with teletherapy-related requirements.

I appreciate the work of the Division of Legislative Audit in helping us strengthen our processes and ensure the highest standards of public protection.

Sincerely,

Noah Shields, LMFT-S LPC-S RPT

Chair, Board of Marital and Family Therapy

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