

Testimony of the Hawaii Marriage and Family Therapist Program

**Before the
Senate Committee on Health and Human Services
Monday, February 2, 2026
1:05 p.m.
Conference Room 225 and Via Videoconference**

**On the following measure:
S.B.2111, RELATING TO Licensure**

Chair San Buenaventura and Members of the Committee:

My name is Young-Im Wilson, and I am the Executive Officer of the Hawaii Marriage and Family Therapist Program (Program). The Department respectfully opposes the Marriage and Family Therapist (MFT) provisions of SB 2111 for the following reasons.

The purpose of this bill is to require marriage and family therapists to complete courses related to domestic violence for licensure and license renewal.

While SB 2111 seeks to enhance professional competency in addressing domestic violence, the proposed additional coursework for Marriage and Family Therapists (MFT) may create unnecessary duplication and overlap with existing licensure and accreditation standards, potentially placing an undue burden on professionals.

Under HRS §451J-7, MFT licensure is currently based on the completion of an approved graduate program and supervised clinical experience. Educational institutions and accrediting bodies require adequate time to develop, approve, and implement new coursework. SB 2111 would impose a new statutory coursework requirement without providing sufficient transition time for existing programs to revise curricula or for applicants to identify approved courses.

Currently, there are no courses in Hawai'i that explicitly satisfy the proposed domestic violence coursework requirement. Current MFT applicants already rely upon the available courses in the state's only Marriage and Family Therapy degree-granting program at Chaminade University to meet existing MFT educational requirements under §451J-7(1)(B). Those include MFT 759: Family Therapy—Violence, Trauma, and Healing and DMFT 8055: Trauma Theory and Models with Vulnerable Populations and Systemic Approaches to Substance Treatment, which represent the only courses that could potentially meet the proposed requirement.

If SB 2111 is enacted as written, out-of-state programs would need time to develop and approve new domestic violence-specific coursework. Depending on faculty availability and other institutional constraints, students may graduate without meeting this new requirement, rendering them ineligible for licensure through no fault of their own. This outcome would further exacerbate the existing shortage of Marriage and Family

Therapists and Provisional Marriage and Family Therapists in the State, particularly if the bill becomes effective July 1, 2026.

Additionally, individuals who have already graduated and are in the process of completing their post-master's supervised experience would be required to return to school to complete a domestic violence-specific course. If such courses are not immediately available, these otherwise qualified applicants would be ineligible for licensure.

Similar concerns apply to continuing education requirements. Pursuant to HRS §451J-1, continuing education courses must be approved by specified professional organizations. Currently, many approved continuing education courses address topics such as trauma and violence generally, rather than domestic violence specifically. If qualifying courses are not approved and available in a timely manner, approximately 812 currently licensed MFTs may be unable to renew their licenses.

As a result, otherwise qualified applicants and licensees may be unable to satisfy licensure or renewal requirements solely due to course availability, causing unintended and avoidable delays. These delays would not reflect a lack of professional competency, but rather a lack of implementation mechanisms.

Absent clear transition provisions, grandfathering, or coordination with education providers, SB 2111 risks disrupting licensure under HRS Chapter 451J and worsening workforce shortages by delaying the entry and retention of qualified MFTs in practice.

For these foregoing reasons, the Department respectfully opposes SB 2111.

Thank you for the opportunity to submit testimony on this bill.

Testimony of the Mental Health Counselor Program

**Before the
Senate Committee on Health and Human Services
Monday, February 2, 2026
1:05 p.m.
Conference Room 225 & Via Videoconference**

**On the following measure:
S.B. 2111, RELATING TO LICENSURE**

Chair Buenaventura and Members of the Committee:

My name is Adrian Stinardo, and I am the Executive Officer of the Hawai'i Mental Health Counselor and Social Worker Programs. The Department of Commerce and Consumer Affairs ("Department") respectfully opposes S.B. 2111.

S.B. 2111 proposes to add domestic violence–related coursework and continuing education requirements to the licensure frameworks for both Mental Health Counselors (HRS Chapter 453D) and Social Workers (HRS Chapter 467E). While the Department recognizes the importance of domestic violence awareness and education, the bill, as drafted, raises significant concerns related to statutory consistency, administrative feasibility, and workforce impacts.

Mental Health Counselors (HRS Chapter 453D)

Under current law, an applicant for licensure as a Mental Health Counselor must possess a master's or doctoral degree consisting of at least 48 semester hours of graduate-level coursework covering nine specific coursework areas, each of which is clearly defined in statute under HRS § 453D-7(a)(1). These detailed statutory descriptions allow the Department to meaningfully review academic transcripts, course descriptions, and syllabi to determine whether an applicant's education satisfies licensure requirements.

Section 3 of S.B. 2111 proposes to add an additional coursework area: "courses related to domestic violence", without providing any statutory definition or description. This would be inconsistent with the existing structure of HRS § 453D-7, which relies on defined subject matter to ensure consistent review. Without a clear statutory definition, both applicants and the Department would lack guidance as to what courses may qualify, increasing inconsistency and administrative burden.

The Department further notes that many in-state and out-of-state counseling programs do not currently offer a standalone course focused specifically on domestic violence. As

a result, otherwise qualified graduates may be rendered ineligible for licensure through no fault of their own.

Additionally, Section 4 of the bill would establish the first statutory continuing education (CE) requirement for Mental Health Counselors in Hawai'i, requiring forty-five total CE credits per triennium, including two credits related to domestic violence. While the Department does not oppose CE requirements in principle, this proposal introduces an inconsistent compliance framework. Specifically, the bill would allow Mental Health Counselors to cure CE noncompliance through an extension requiring completion of ninety hours of CE, including twelve hours in ethics, prior to the next triennium. Comparable licensed mental health professions (such as Marriage and Family Therapists and Social Workers) do not have a similar statutory extension mechanism. This creates unequal regulatory treatment among similarly situated licensees.

Social Workers (HRS Chapter 467E)

Unlike Mental Health Counselors, Social Worker licensure statutes do not require completion of specific coursework areas within a master's degree program. Section 3 would introduce a single, undefined domestic violence-related course as the first statutorily required coursework for Social Workers. The Department is concerned that adding a standalone coursework requirement without a broader statutory framework for reviewing and verifying graduate-level education is inconsistent with the current licensure structure and presents implementation challenges.

The bill would also require Social Workers to complete domestic violence-related continuing education as part of their licensure requirements. As with Mental Health Counselors, the lack of statutory clarity regarding what qualifies as "courses related to domestic violence" presents challenges for both licensees and regulators.

If enacted as written and effective July 1, 2026, S.B. 2111 may have unintended consequences for Hawai'i's mental health workforce. Educational institutions both in-state and out-of-state would require time to develop, approve, and implement domestic violence-specific coursework. Many students will graduate without meeting the new requirement, and individuals currently completing post-graduate supervised experience could be forced to return to school solely to satisfy this requirement.

Absent clear transition provisions, grandfathering, or coordination with educational providers, the bill risks delaying licensure, increasing barriers to entry, and exacerbating existing shortages of Mental Health Counselors and Social Workers across the State.

For these reasons, the Department respectfully opposes S.B. 2111 as currently drafted.

Thank you for the opportunity to provide testimony on this measure.

Testimony of the Board of Pharmacy

**Before the
Senate Committee on Health and Human Services
Monday, February 2, 2026
1:05 p.m.
Via Videoconference**

**On the following measure:
S.B. 2111, RELATING TO LICENSURE**

Chair San Buenaventura and Members of the Committee:

My name is Christopher Fernandez, and I am the Executive Officer of the Board of Psychology (Board). While the Board appreciates the intent of this measure, it has not yet had the opportunity to meet and take a formal position. However, based on its position on previous legislation, the Board offers the following comments regarding section 5 of this measure.

The purpose of SB 2111 is to require marriage and family therapists, mental health counselors, psychologists, and clinical social workers to complete courses related to domestic violence for licensure and renewals.

This measure is substantially similar to SB 1635 from the 2025 Legislative session. At its February 7, 2025, meeting, the Board voted to oppose the bill. Although the Board supported the intent of the measure, it expressed concern that requiring domestic violence continuing education each biennium could establish a precedent for mandating additional topic-specific continuing education. The Board viewed this as potentially limiting a psychologist's ability to pursue continuing education aligned with their professional development and scope of practice.

Additionally, the Board further noted that the availability of coursework in domestic violence offered in graduate programs at regionally accredited institutions currently accepted for licensure could potentially exclude otherwise qualified applicants from licensure.

Thank you for the opportunity to testify on this bill.

Testimony of
John M. Kirimitsu
Counsel

Before:
Senate Committee on Health and Human Services
The Honorable Joy A. San Buenaventura, Chair
The Honorable Angus L.K. McKelvey, Vice Chair

February 2, 2026
1:05 pm
Conference Room 224

Re: SB 2111 Relating to Licensure

Chair, Vice Chair, and committee members, thank you for this opportunity to provide testimony on this measure mandating domestic violence courses for licensure and renewals.

Kaiser Permanente Hawaii would like to offer comments.

Kaiser recognizes that while well-intentioned, this bill mandating the addition of domestic violence (DV) curriculum for mental health licensure create barriers that worsen the current provider shortage and places an undue burden on an already strained behavioral health workforce. Adding another, specific, mandatory curriculum requirement acts as an unnecessary barrier to entering or remaining in the mental health profession. With our state already facing a severe mental health provider shortage, we believe that this additional curriculum mandate will only exacerbate our access problem for the following reasons:

Further Reduced Access to Care: If licensure becomes too difficult to obtain (by adding this added barrier), we risk creating a greater shortage of licensed therapists, which will be particularly impactful in our rural or underserved areas.

Not Part of Standardized Graduate Curriculum: While fundamental in some limited programs, DV curriculum is not uniformly integrated into all accredited mental health graduate programs. Adding this specific curriculum requirement, which is not typically included in a standardized graduate program, creates a further barrier for new professionals attempting to enter the mental health profession, as well as other interested out-of-state applicants.

No "Grandfather Clause" Exempting Already Licensed Professionals: Without an added "Grandfather Clause," those already licensed therapists must put their practice on hold to complete this new DV curriculum mandate, potentially further reducing available mental health services in our community.

Inaccessibility of Approved DV Training (No Courses Available): A significant barrier is the lack of readily available, approved, and nationally recognized DV curriculum. This creates an impractical burden on new applicants, as well as those already licensed therapists (renewals), and potential delays in licensure, resulting in a further reduction in the mental health workforce.

Thank you for the opportunity to comment.



Hawai'i Psychological Association

For a Healthy Hawai'i

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COMMITTEE ON HEALTH AND HUMAN SERVICES

Senator Joy A. San Buenaventura, Chair
Senator Angus L.K. McKelvey, Vice Chair

Monday, February 2, 2026 1:05 PM
Conference Room 225 & Videoconference

Comments on SB2111 RELATING TO LICENSURE

SB 2111 requires licensed mental health professionals (including psychologists) to complete "courses related to domestic violence for licensure and renewal."

Hawaii currently mandates specific domestic violence training for licensed psychologists, requiring doctoral programs to incorporate coursework and renewal continuing education on domestic violence for psychologists (and other mental health professionals) to meet initial licensure and renewal criteria, reflecting a state-level requirement beyond just general doctoral education.

Including an additional requirement to complete the same coursework for license renewal is redundant. Moreover, such a requirement would place an undue burden on the Hawaii Board of Psychology, which would be responsible for tracking and verifying completion of such coursework for license renewal.

If a requirement to complete courses related to domestic violence for license renewal is considered, we request clarification of the number of hours, specification of course content, and what agency(ies) may sponsor and certify such coursework.

Thank you for the opportunity to provide input into this important bill.

Sincerely,

A handwritten signature in cursive script that reads "Alex Lichton, Ph.D.".

Alex Lichton, Ph.D.
Chair, HPA Legislative Action Committee



HAWAII GOVERNMENT EMPLOYEES ASSOCIATION
AFSCME Local 152, AFL-CIO

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The Thirty-Third Legislature, State of Hawaii
The Senate Committees on Health and Human Services

Testimony by
Hawaii Government Employees Association
February 2, 2026

S.B. 2111 – RELATING TO LICENSURE

The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO offers comments on S.B. 2111 which seeks to require marriage and family therapists, mental health counselors, psychologists, and clinical social workers to complete courses related to domestic violence for licensure and renewals.

While the purpose and intent to S.B. 2111 is truly admirable, in effect, the passage of this bill into law would appear to add additional cost to the already costly process of licensure and renewal of licenses to practice as marriage therapists, family therapists, mental health counselors, psychologists, and/or clinical social workers.

Accordingly, **we respectfully request that if this bill is passed into law, it be done with amendments to the effect that the State of Hawaii and respective counties shall pay for all such required courses for applicants seeking licensure and existing public employees seeking renewal of licensure.**

Accordingly, the Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO encourages you to amend to S.B. 2111.

We appreciate your consideration of our testimony providing comments regarding S.B. 2111.

Respectfully submitted,

Randy Perreira
Executive Director