



QRTIPS

Health Care Agency, Behavioral Health Service, CYBH Quality Review and Training

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Professional Licensing Waivers

A Professional Licensing Waiver is requested by the Mental Health Plan and issued by the State and **is the only 'exception' noted in Welfare and Institutions Code** section 5751.2 for psychology candidates or those recruited from outside California. See DHM Letter 10-03: <http://www.dhcs.ca.gov/formsandpubs/MHArchiveLtrs/MH-Ltr10-03.pdf>

A professional licensing waiver is issued by the **State Department of Health Care Services (DHCS)** following an application completed by one of the following three county programs: **Authority and Quality Improvement Services (AQIS), County of Orange Human Resources or County of Orange Volunteer services**. The waiver allows pre-licensed psychologist/and psychologist trainees **to bill Medi-Cal** during the time they are acquiring supervised professional experience to obtain their license. The waivers are issued **only once and run continuously for 5 years** irrespective of the intern's employment or placement status. The State maintains a database of issued waivers. If a student intern moves to another agency or placement the same waiver follows that student. Another waiver is never re-issued.

Psychologists **previously licensed in other states** are granted waivers **for only 3 years** as it is expected that they will obtain their California psychologist license within that time frame.

For **masters level** pre-licensed social workers (ASW) and marriage and family therapists (IMF), the Board of Behavior Sciences (BBSE) intern registration serves as the waiver. For pre-licensed therapist in the MFT or LCSW track, as long as they have a valid intern registration number, they can bill Medi-Cal. An intern registration number is renewed on an annual basis and is **valid for up to 6 years**. If an MFT or LCSW license is not obtained within that time period, the intern must re-apply to the BBSE for a new intern number. That number **will be valid for an additional 6 years**, but must continue to be renewed annually.

Psychology student interns meet the waiver requirements when they have **accumulated 48 semester units (72 quarter units) of graduate coursework**. Agencies should make note of when their student interns have reached the graduate coursework threshold and promptly request a waiver from their contract monitor or AQIS. A pre-licensed psychology student intern meeting the accumulated graduate coursework requirement **cannot bill Medi-Cal** for psychotherapy, family therapy or group services until such time a waiver is issued by the state. A pre-licensed social worker or marriage and family therapist **cannot bill Medi-Cal without a valid intern registration**. They can bill for rehab services under some circumstances.

It is the **responsibility of county and contract programs** to determine whether pre-licensed employed staff and student interns meet professional licensing waiver requirements. Programs are **strongly encouraged** to contact AQIS or their contract monitors if they have any questions about whether or not an intern needs a waiver.

Keep in mind that the state licensing boards do not issue the waivers but **do regulate and monitor the professional licensing and supervision requirements for student interns**. Supervising agencies and interns remain accountable to the State licensing boards with respect to maintaining records of their interns' supervised professional experience. Contract and county programs are encouraged to contact the State licensing boards if they have any questions about the employment/supervision of interns. For contract programs, it is the expectation of **Children and Youth Behavioral Health (CYBH)** that post-doctoral psychologists obtain the waiver and become **registered psychologist or psychological assistants prior to employment**.

Agencies in the mental health plan should be cognizant of the waiver expiration date and inform their employees and interns when the waiver will expire. Psychologist student interns should be aware of their waiver expiration date and

strive to obtain their professional license prior the expiration of the waiver to avoid any impact on their employment status.

The Department of Health Care Services maintains a website regarding profession licensing waivers:

<http://www.dhcs.ca.gov/services/MH/Pages/MHPLW.aspx>.

AQIS has developed a PowerPoint training regarding interns in Children and Youth Behavioral Health.

<http://www1.ochca.com/ochalthinfo.com/training/bhs/interns/>