



<b>Health Care Agency Behavioral Health Services Policies and Procedures</b>	Section Name:	Medi-Cal Managed Care
	Sub Section:	Compliance
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	SIGNATURE	DATE APPROVED
Director of Operations Behavioral Health Services	<u>Signature on File</u>	<u>3/19/19</u>

**SUBJECT:** Clinical Supervision Requirements

**PURPOSE:**

To establish procedures for ensuring the required clinical supervision (as regulated by the respective governing board i.e. Board of Behavioral Sciences) for all Behavioral Health Services (BHS) County and County Contracted registered/waivered employees, interns and volunteers that provide direct Specialty Mental Health Services (SMHS) within the Mental Health Plan (MHP) and direct services in the Drug Medi-Cal Organized Delivery System (DMC-ODS). Direction may include, but is not limited to, being the person directly providing the service, acting as a clinical team leader, direct or functional supervision of service delivery, or approval of client plans.

**POLICY:**

Mandated clinical supervision shall be provided and documented for all registered/waivered BHS County and County Contracted employees, interns and volunteers per the regulations of the licensing boards. Clinical supervision shall be obtained from Licensed Mental Health Professionals (LMHP) within the same legal entity. Health Care Agency (HCA) Authority and Quality Improvement Services (AQIS) shall track, monitor, audit and instruct the recoupment of claims to ensure compliance with the requirements of clinical supervision.

**SCOPE:**

This policy applies to all registered/waivered BHS County and County Contracted employees, interns and volunteers providing SMHS, DMC-ODS services and to the Licensed Mental Health Professionals (LMHP) providing the required clinical supervision.

**REFERENCES:**

[MHSUDS Information Notice No.: 17-040 - Chart Documentation Requirement Clarification](#)

BHS AQIS Clinical Supervision Reporting Form (Available from BHS AQIS 714-834-5601)

Title 16, California Code of Regulation (CCR) Sections 1870, 1833, 1821, 1387 and 1822

**DEFINITIONS:**

Registered - an unlicensed person who has completed a master's or doctoral degree program and is registered with the respective governing board and is accruing hours of supervised professional experience toward licensure.

Waivered - an unlicensed person or a licensed person recruited from outside California is issued a waiver by the Department of Health Care Services to provide services requiring a license.

Legal entity - each MHP and each of the corporations, partnerships, agencies, or individuals providing specialty mental health services under contract with the MHP, except that legal entity does not include individual or group providers, Fee-For-Service/Medi-Cal hospitals or psychiatric nursing facilities (CCR, Title 9, §1840.100). For DMC-ODS, legal entity means each county alcohol and drug department or agency and each of the corporations, sole proprietors, partnerships, agencies, or individual practitioners providing alcohol and drug treatment services under contract with the county alcohol and drug department or agency or with DHCS.

Clinical Supervision - responsibility for, and control of, the quality of mental health and related services provided by the supervisee (Business and Professions Code Sections 4996.20(b), 4999.12(m)). It must be provided by a Licensed Mental Health Professional (LMHP) who meets all elements of the requirements set forth by the respective governing boards. Please see Title 16, California Code of Regulation (CCR) Sections 1870, 1833, 1821, 1387 and 1822 for specific requirements.

**PROCEDURE:**

- I. The following activities may be provided by a registered/waivered BHS County and County Contracted employee, intern or volunteer **only** when under the clinical supervision of a Licensed Mental Health Professional (LMHP), regardless of whether or not the registered or waived staff has completed the collection of supervised hours required to sit for the licensing exam:
  - A. Provide services
  - B. Approve care plans
  - C. Act as clinical team leader
  - D. Diagnose
  - E. Conduct a Mental Status Exam (MSE)
  - F. Document medication history
  - G. Assess relevant conditions and psychosocial factors affecting the client's physical and mental health.

- II. Should any of the services described in I A-G above be provided by a registered/waivered BHS County and County Contracted employee, intern or volunteer who is not receiving the required clinical supervision, the provision of the services shall cease immediately and the situation shall be reported to HCA AQIS (714-834-5601) and to HCA Office of Compliance (714-568-5614).
  
- III. Every time a LMHP assumes the clinical supervision of a registered/waivered BHS County or County Contracted employee, intern or volunteer, the LMHP shall complete a Clinical Supervision Reporting Form and submit that form to the HCA AQIS. The LMHP shall also submit a copy of the completed Board of Behavioral Services (BBS) Responsibility Statement for Supervisors.
  - A. The Clinical Supervision Reporting Form shall include:
    - 1. The name of the registered/waivered supervisee.
    - 2. The registration type and number of the registered/waivered supervisee.
    - 3. The date the clinical supervision **began.**
    - 4. The name, including degree, of the clinical supervisor.
    - 5. The license type and number of the clinical supervisor.
    - 6. The signatures of the registered/waivered supervisee and the clinical supervisor.
  
- IV. Every time a LMHP terminates the supervision of a registered/waivered BHS County or County Contracted employee, intern or volunteer, including the termination of clinical supervision because a staff person has become licensed, registration number changes or supervisor change, the LMHP shall complete another BHS AQIS Clinical Supervision Reporting Form and submit that form to the HCA AQIS.
  - A. The BHS AQIS Clinical Supervision Reporting Form shall include:
    - 1. The name of the registered/waivered supervisee.
    - 2. The registration type and number of the registered/waivered supervisee.
    - 3. The date the clinical supervision **terminated.**
    - 4. The name, including degree, of the clinical supervisor.
    - 5. The license type and number of the clinical supervisor.
    - 6. The signatures of the registered/waivered supervisee and the clinical supervisor.

- V. The minimum requirements for clinical supervision for the purpose of this Policy and Procedure (not for the purposes of the registered/waivered BHS County or County Contracted employee, intern or volunteer collecting the supervision hours required to sit for the licensing exam) are:
- A. Per the Board of Behavioral Sciences:
1. For registered Associate Clinical Social Worker (ASW): At least one unit of supervision for the first 10 hours of psychotherapy/counseling in any week. One additional unit of supervision required for 10+ hours of psychotherapy/counseling in a given week. After required hours have been accrued, a minimum of one unit of supervision per week for each work setting.
  2. For registered Associate Marriage and Family Therapist (AMFT): At least one unit of supervision for the first 10 hours of psychotherapy/counseling in any week. One additional unit of supervision required for 10+ hours of psychotherapy/counseling in a given week. After required hours have been accrued, must be under supervision at all times until issued a license.
  3. For registered Associate Professional Clinical Counselors (APCC): At least one unit of supervision for the first 10 hours of psychotherapy/counseling in any week. One additional unit of supervision required for 10+ hours of psychotherapy/counseling in a given week. After required hours have been accrued, must be under supervision at all times until issued a license.
- B. Per the Board of Psychology:
1. For registered/waivered psychologists: At least one hour of direct individual supervision each week. Must be provided with supervision for 10% of the total time worked each week. After required hours have been accrued, supervision is still required until licensed.
- \*For more detailed requirements, please refer to respective boards.
- VI. Any registered/waivered BHS County or County Contracted employee, intern or volunteer who is not receiving the clinical supervision described above on the date of service shall not provide, bill or claim services.
- A. Should any provision/billing/claiming of services by a registered/waivered BHS County or County Contracted employee, intern or volunteer occur when there is not properly documented clinical supervision in place, the provision/billing/claiming shall immediately cease and the situation shall be reported to HCA AQIS (714-834-5601) and to HCA Office of Compliance (714-568-5614).
- VII. Any interns/trainees under the supervision of a registered/waivered BHS County or County Contracted employee shall not provide, bill or claim services unless that

registered/waivered County or County Contracted employee, intern or volunteer is receiving the clinical supervision described above.

- A. Should any provision/billing/claiming of services by interns/trainees receiving clinical supervision from registered/waivered BHS County or County Contracted employees, interns or volunteers occur when there is not properly documented clinical supervision of that registered/waivered BHS County or County Contracted employee, intern or volunteer in place, the provision/billing/claiming shall immediately cease and the situation shall be reported to HCA AQIS (714-834-5601) and to HCA Office of Compliance (714-568-5614).