

Requirements, Responsibilities and Qualifications for Supervisors of Associate Clinical Social Workers

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Who needs supervision?

There are many conditions under which a therapist must receive supervision for the services s/he provides. The most common reason for a clinician to be supervised is to fulfill the requirements for licensure as a Clinical Social Worker.

When is supervision required?

Supervision is required for professional experience accrued following completion of a graduate degree in Clinical Social Work.

What are the conditions that apply to supervision?

The supervisor may provide supervision to the associate clinical social worker who is registered by the Board of Behavioral Sciences for the express purpose of accruing clinical hours to fulfill the requirement for licensure.

In accordance with law and with California's Board of Behavioral Sciences' Statutes and Regulations Relating to the Practice of Professional Clinical Counseling, Marriage and Family Therapy, Educational Psychology and Clinical Social Work:

All applicants and registrants shall be at all times under the supervision of a supervisor who shall be responsible for ensuring that the extent, kind, and quality of counseling performed is consistent with the training and experience of the person being supervised, and who shall be responsible to the board for compliance with all laws, rules, and regulations governing the practice of clinical social work. 4996.18.G (d)

Appropriate for services being provided

Supervisees must be under immediate supervision for the type, extent, and quality of clinical services provided during the course of their supervised experience. Group supervisors should ensure the extent and quality of supervision is fitting for each supervisee ([AB 93](#)).

Consistent with the skills and competencies of the supervisor

The limited services provided by the supervisee must be in concert with the competencies and skills of the supervisor at all times. For example, if a supervisee desires supervision of counseling with a certain population, s/he must be supervised by a person adequately educated and trained in counseling that population.

Who can supervise an Associate Clinical Social Worker?

The supervisor may be a Licensed Marriage & Family Therapist, a Licensed Clinical Social Worker, a Licensed Professional Clinical Counselor, a Psychologist, or a physician certified in Psychiatry by the American Board of Psychiatry and Neurology. While licensed professionals from other disciplines may supervise for a portion of required hours, ***half of all hours must be under the supervision of an LCSW.***

What are the qualifications for serving as a Clinical Supervisor?

All Laws and Regulations for the State of CA for Supervisors of Associates have been summarized below, but can also be viewed in full at the Board of Behavioral Sciences website: <https://www.bbs.ca.gov/licensees/supervisor.html>

Qualifications for supervisors of ASW clinicians depend on the licensure level and type of the supervising clinician. As such, these are described below by category.

Licensed Clinical Social Worker (LCSW) – LCSWs supervising an ASW must:

- Possess a current and valid California license that is not under suspension or probation,
- Be licensed in California or another state for at least two of the five years prior to the commencement of supervision,
- complete a minimum 15 contact hours in supervision training,
- Have practiced psychotherapy or directly supervised associates or marriage and family therapist associates or trainees who perform psychotherapy as part of their clinical practice in two of the past five years immediately preceding the commencement of supervision.
- NOTE: ASWs are required to obtain 13 weeks (which can be individual or triadic) of the total 3,000 hours of post-master's degree experience under a LCSW to qualify for licensure ([AB 93](#)).

Licensed Marriage and Family Therapist (LMFT) – LMFTs supervising an ASW must:

- Possess a current and valid California license that is not under suspension or probation,
- Be licensed in California or another state for at least two of the five years prior to the commencement of supervision,
- Complete a minimum of 15 contact hours of training,
- Have practiced psychotherapy or directly supervised associates or marriage and family therapist associates or trainees who perform psychotherapy as part of their clinical practice in two of the past five years immediately preceding the commencement of supervision.

Licensed Professional Clinical Counselor (LPCC) – LPCCs supervising an ASW must:

- Possess a current and valid California license that is not under suspension or probation,

- Be licensed in California or another state for at least two of the five years prior to the commencement of supervision
- Complete a minimum of 15 contact hours in supervision training,
- Have practiced psychotherapy or directly supervised associates or marriage and family therapist associates or trainees who perform psychotherapy as part of their clinical practice in two of the past five years immediately preceding the commencement of supervision.

Licensed Psychologist (licensed through the Board of Psychology) – Psychologists supervising an ASW must:

- Possess a current and valid California license that is not under suspension or probation,
- Be licensed in California or another state for at least two of the five years prior to the commencement of supervision,
- Have practiced psychotherapy or directly supervised associates or marriage and family therapist associates or trainees who perform psychotherapy as part of their clinical practice in two of the past five years immediately preceding the commencement of supervision.
- *Psychologists are **not** required to complete 15 contact hours of supervision training but are instead bound by the regulations for supervisors as indicated by the Board of Psychology (currently requires 6 hours of training in supervision).*

Licensed Physician certified in psychiatry by the American Board of Psychiatry and Neurology – Psychiatrists supervising an ASW must:

- Possess a current and valid California license that is not under suspension or probation,
- Be licensed in California or another state for at least two of the five years prior to the commencement of supervision
- Have practiced psychotherapy or directly supervised associates or marriage and family therapist associates or trainees who perform psychotherapy as part of their clinical practice in two of the past five years immediately preceding the commencement of supervision.
- *Physicians are exempt from the 15-hour Supervision Training requirement*

Additional qualifications of all clinicians supervising ASW's:

- The supervisor may not be related by blood, marriage, domestic partnership, or intimate bond to the supervisee as any and all of these relationships would impair the effectiveness of the supervision, as well as the perception of authority of the supervisor.
- The supervisor has never acted as a therapist to the supervisee.
- The supervisor has not had a personal or professional relationship with the supervisee which by its nature impedes the supervisory role.
- Prior to the onset of counseling or supervision, the supervisor must complete the "Responsibility Statement for Supervisors of an Associate Clinical Social Worker." The Supervisor must send the original to the Board and must provide a copy to the supervisee.

A sample of the Responsibility Statement is provided by the Board of Behavioral Sciences on their website at <http://www.bbs.ca.gov/pdf/forms/lcs/lcrespon.pdf>

- The supervisor must ensure that the supervisee has applied to the Board of Behavioral Sciences to serve as an ASW and has paid the application and any annual renewal fee.
- The supervisor and supervisee must develop a supervisory plan that identifies goals and objectives for the supervision experience. That plan must be submitted to the Board of Behavioral Sciences ***within 30 days of the onset of the supervisory experience***. That form is available through the BBS at <http://www.bbs.ca.gov/pdf/forms/lcs/supplan.pdf>
- The supervisee may act as a W-2 employee at the setting of his/her supervisor or act as a volunteer.
- If the supervisory experience occurs within the private practice setting, the supervisor must practice at the same site as the supervisee (AB 93).
 - Effective January 1, 2019 the Board disallows supervision by a supervisor who does not practice at the same site and work for or own said private practice.
 - Regarding incorporated entities, a supervisor is required to be a full-time employee at the same site as the supervisee.
- If the ASW is not working in a private practice, and the supervisor is not employed by the same agency as the supervisee, the supervisor must have a written agreement with the supervisee's employer.
- The supervisee may not be an independent contractor (1099 employees), unless:
 - An applicant providing voluntary services (not at a private practice) who is reimbursed solely for expenses incurred, will be considered an employee rather than independent contractor. The previous \$500 reimbursement limit was removed (AB 93).
 - In the case of a board audit, the applicant bears the responsibility to detail reimbursement amounts and the nature thereof.
 - Recipients of stipend and educational loan repayments related to increasing service to underserved groups and areas will be considered an employee (rather than a contractor). The applicant must maintain documentation demonstrating any such award and present them if audited.
- The supervisor must ensure that the supervisee informs each prospective client prior to the start of psychotherapy that s/he is unlicensed, and is being supervised.
- The supervisor must provide individual or triadic face-to-face supervision at the rate of one hour per every five client contact hours, for not less than 104 weeks. At least 50% of that face-to-face supervision must be provided as individual supervision.
- A two-hour supervision group (with 8 or less supervisees) counts as one hour of direct supervision contact.
- The supervisor may charge for supervision.

What are the additional responsibilities of a Clinical Supervisor?

- The supervisor is responsible for monitoring the supervisee sufficiently so that s/he can insure the scope, type, and quality of the clinical services performed by the supervisee.
- All activities supervised must be recorded in a Supervision Log completed daily or weekly and available for review during supervision sessions. An example of such a log is available from the BBS at <http://www.bbs.ca.gov/pdf/forms/lcs/aswlog.pdf>
- The supervisor must regularly review the supervisee's records to evaluate his/her clinical assessments and treatments.
- The supervisor must maintain regular assessment of the supervisee's clinical skills and deficits.
- The supervisor is responsible for the collection of fees from the supervisee's clients. This does not mean that a supervisee cannot accept payment from his/her clients- rather it means that monies collected from clients must then be passed along to the supervisor, who will then manage the accounting.
- The supervisor must give the supervisee at least one week's written notice of the intent not to continue the supervision experience.

How does one begin supervision?

Following completion of the Clinical Social Work degree, clinicians need to accrue experience as ASWs. After the clinician has registered with the BBS, s/he must select a supervisor. Unlicensed clinicians may select potential supervisors from a wide variety of sources. Once a supervisor has been selected, that clinician will need to complete a Responsibility Statement prior to the onset of any counseling or supervision. That form is available from the BBS at <http://www.bbs.ca.gov/pdf/forms/lcs/lcrespon.pdf>

Requirements for Licensure

California law requires 3,000 hours of supervised post-degree professional experience, including 104 supervised weeks, in order to qualify for LCSW licensure. *Note, effective January 1, 2019, there was a reduction in required supervised hours from 3,200 to 3,000 and non-clinical hours from 1,200 to 1,000).*

3,000 Hours of Supervised Experience Breakdown of Requirements

- Minimum 2,000 hours: Clinical psychosocial diagnosis, assessment, and treatment, including psychotherapy or counseling
- o Minimum 750 hours (of the above 2,000): Face-to-face individual or group psychotherapy
- Maximum 1,000 hours: Client-centered advocacy, consultation, evaluation, and research
- Minimum 1,700 hours: Supervision by an LCSW

- Maximum 1,500 hours: Supervision by another type of licensed mental health professional

Changes Specific to LCSW Law Effective 2019:

In addition to the changes in required supervised experience mentioned above, the 90-day rule (previously unique to marriage and family therapy and professional clinical counselors) has now been extended to social work applicants. This clause allows an applicant who applies to be an ASW within 90-days of his/ her master's degree award, to count hours gained between that date and the date the Board issues associate registration, toward supervisory experience requirements ([AB 456](#)).

- The board must receive the applicant's application within 90-days of his/ her degree being granted in order to qualify for this clause. *The applicant may not volunteer or work in a private practice until actual registration issuance.* This goes into effect January 1, 2019.
- For all applicants of the 90-day rule (ASW, AMFT, and APCC) whose graduate degree completion is after January 1, 2020, there will be a change—they must prove Live Scan fingerprinting was administered by the employer prior to experience hours being claimed. Proof thereof must be submitted with application.

As aligned with LMFT and LPCC law, two changes were made to LCSW law ([AB 93](#)):

- Social work supervisors are now legally required to ensure the supervision site complies with law specifying acceptable sites.
- Social work supervisors must maintain a current and active license and be in “good standing” with the Board to offer supervision.
- Social work supervisors are disallowed from providing supervision to those whom they previously provided therapeutic services to.

Changes Effective 2019:

Supervised Experience ([AB 93](#))

- The 15 supervisee per corporation limit was removed.
 - *No change to the 3-supervisee per supervisor limit.*
- Triadic supervision is now permitted, which is face-to-face supervision by one supervisor to two supervisees. This form of supervision may go toward to the 52-week supervision requirement. These hours may now be completed via individual or triadic supervision, or a combination thereof. Prior supervision categories were limited to individual and group.
- It was elucidated that consultation and peer-to-peer encounters do not count as supervision

- It was elucidated that upon completion of required supervisory hours and prior to licensure, a supervisee must continue to engage in an hour of weekly supervision in each setting direct clinical work is facilitated. This is not required for non-clinical work.
- At minimum, supervisees must be provided with an hour of supervision for every 5 hours of direct clinical contact per week.
- Supervisory experience within the private practice setting must be offered by a supervisor who practices at the same site as the supervisee.
- Supervisors may arrange supervision coverage in the instance of vacation or sick leave as long as such coverage aligns with supervision laws.

Board Audits

The BBS is now authorized to and may audit clinical supervisors to ensure compliance with the above detailed qualifications. An audit may occur at any time during supervision or for 7 years thereafter. Thus, supervisors must maintain records for each supervisee for 7 years following termination ([AB 93](#)).

Changes Effective July 1, 2020:

In regards to criminal convictions among applicants, a license may only be denied on the basis of this conviction/ discipline if one of the below criteria are met ([AB 2138](#)):

- The conviction occurred within 7 years of application and correlates with the “qualifications, functions, or duties of the profession.” This 7-year rule does not pertain to serious felony convictions (Penal Code §1192.7) or registered sex offenses (Penal Code §290(d)(2) or (3)).
- The applicant was formally disciplined by a licensing board in the previous 7 years for misconduct “substantially related” to the professional role and which would have resulted in disciplinary action by the Board. *This does not include previously dismissed or expunged convictions.*

Changes Effective January 1, 2021:

Clinical Social Work applicants must complete 6 hours of coursework or supervised experience on suicide risk assessment and intervention ([AB 1436](#)). This can be obtained via:

- A degree program; the applicant must provide the board with written certification from the school’s registrar or training director if experience is gained through academic programming.
- Clinically supervised experience; the applicant must provide the board with written certification by the clinical supervisor if experience is gained through supervision.
- Completion of a qualifying continuing education course; a certificate of completion must be provided to the board.

Existing licensees must sign (under penalty of perjury) a statement of compliance with the above coursework requirement upon renewal (or reinstatement/ reactivation of licensure). Note, existing licensees will not be required to provide written verification of coursework to the board, but should maintain this verification in the instance of a board audit.