San Bernardino County
Department of Behavioral Health

Registration and Licensure Requirements for Pre-Licensed Clinical Therapists Policy

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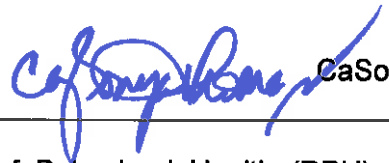

CaSonya Thomas, Director

Policy

All Department of Behavioral Health (DBH) pre-licensed clinical therapists must meet California Board of Behavioral Sciences (BBS) registration requirements and CA regulations regarding a Registered Professional to be employed by a local mental health program and to provide mental health services.

Purpose

To inform pre-licensed clinical therapists and their supervisors of licensing board registration requirements, and advise of the required timeframes pre-licensed clinical therapists must become licensed.

Applicable Disciplines

This policy applies to pre-licensed clinical therapists seeking licensure as a Clinical Social Worker, Marriage and Family Therapist or Professional Clinical Counselor.

Pre-Licensed Psychologists and clinical therapists licensed in US states other than CA shall refer to DBH policy HR4011 Waiver for Pre-Licensed/Out-of-State Licensed Ready Psychologists, for licensure and waiver requirements.

Definitions

Recent college graduate: An individual who has graduated within the last 90 days with a Master's degree in behavioral science accepted by the BBS for registration.

Registered Professional: An individual who has registered with the BBS as a Registered Associate Clinical Social Worker, Marriage and Family Therapist Registered Intern or Professional Clinical Counselor Registered Intern to obtain supervised clinical hours for licensure.

Board Registration Requirement

All recent college graduates who accept employment with DBH as pre-licensed clinical therapists must be Registered Professionals with the BBS within 60 calendar days of employment with DBH. Failure to obtain registration within 60 days may result in termination, as being a Registered Professional is a requirement per Title 9 of the CA Code of Regulations, Section 1810.254 and CA Welfare and Institutions Code, Section 5751.2.

Important Note: DBH has the right and discretion to extend the 60-day timeframe to obtain registration on a case-by-case basis at the Director's discretion.

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Board Registration Requirement, continued

DBH shall comply with Department of Health Care Services (DHCS) requirements and state regulations regarding the scope of services recent college graduates can perform while registration is pending with the BBS.

All pre-licensed clinical therapists who are not recent college graduates, registration with the BBS must occur before employment commences. Lack of valid registration will delay employment start date.

Licensure Requirement

Pre-licensed clinical therapists must obtain licensure within six (6) years of the original date of registration with the BBS. Failure to obtain licensure within six (6) years may result in termination.

For pre-licensed clinical therapists who are meeting job expectations and actively pursuing licensure, yet have not obtained licensure nearing the six (6) year deadline; please see the Extension of Continued Employment Section of this policy.

Roles and Responsibilities

The information below describes roles and responsibilities for staff regarding the hiring and employment of pre-licensed clinical therapists:

Roles	Responsibilities

Hiring Program Manager/Supervisor	• Obtain current and if applicable, previous BBS registration numbers from job application, obtain other names used by the candidate on his/her job application, and provide to secretary to confirm validity
	• Advise contingent offer applicant that registration is needed before employment commences, if not registered, unless person is recent college graduate
	• Ensure recent college graduates obtains registration within 60 calendar days of employment
	• Monitor pre-licensed clinical therapist's progress towards licensure
	  ○ Document progress towards licensure in therapist's work performance evaluation
	  ○ Refer therapist to DBH policy TRA8010 License Exam Prep Program Policy
	  ○ Regularly review and sign necessary documentation of hours for BBS, if providing clinical supervision

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Registration and Licensure Requirements for Pre-Licensed Clinical Therapists Policy, Continued

Roles and Responsibilities, continued

Roles	Responsibilities
Secretary to Hiring Program Manager/Supervisor	• Obtain registration information and confirm validity of registration with BBS' online license verification system
Payroll	• Collect BBS registration information • Verify registration on BBS' online system • Complete Pre-Licensed MFT/MSW/PCC Statement of Awareness of Need to Obtain Licensure for Employment based on the original registration date for applicant to complete ○ Send copy of Statement of Awareness of Need to Obtain Licensure for Continued Employment to DBH Compliance • Maintain registration information in personnel file • Notify HRO or designee when there is an out of state license-ready applicant
Compliance	• Provide notice to identifying individuals whose registration or license is about to expire, and for whom no registration is on file ○ Send copy of notice to appropriate supervisor and program manager • Notify applicable Deputy Directors, Program Managers and Human Resources Officer if licensure or registration expires or if registration never obtained
Pre-Licensed Clinical Therapist	• Obtain and maintain valid registration with the BBS until licensed • Provide immediate supervisor with evidence that they are progressing towards licensure during each evaluation period • Inform immediate supervisor of any change in registration status, including becoming licensed

Extension of Continued Employment

DBH acknowledges there may be extenuating circumstances as to why a pre-licensed clinical therapist has not attained licensure. Therefore, the DBH Director will review and determine, on a case-by-case basis, whether to grant a one (1) year extension to an employee who has not obtained licensure within the stipulated time. An extension may be requested annually for one year at a time, up to a maximum of three (3) years if the therapist is actively pursuing licensure and is expected to obtain licensure within one (1) to three (3) years, after his/her first BBS registration number expires.

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Extension of Continued Employment, continued

To request an extension, the following conditions must be met:

- Employee must be meeting job expectations, including, but not limited to, the following: meeting productivity requirements, completing chart documentation timely and exhibiting good clinical judgment, and
- Employee must have a combination of the following that shows licensure can be obtained within one (1) year after extension is granted, one year at a time, but no later than three (3) years from the second registration number with the BBS:
  - Proof of supervised hours for BBS exam qualification
  - Scheduled date for BBS required licensure exams or first available BBS required licensure exam after completion of hours
  - Proof of having taken at least one BBS required licensure exam
  - Timetable for reexamination
  - A valid second registration number

The table below describes roles and responsibilities for staff when requesting an extension:

Roles	Responsibilities
Employee requesting extension	• Generate a request for extension memo to his/her immediate supervisor at least 45 days before the six (6) year BBS registration expires • Indicate on the memo the progress the employee has made on becoming licensed • Provide proof to supervisor of the progress that is indicated on the memo
DBH Supervisor	• If agree with extension request, generate a request for extension that includes a justification for the extension including details about the aforementioned bullets and most current WPE showing employee is meeting standards ○ Forward extension request to applicable Program Manager for review and approval • If disagree with extension request, work with Program Manager, Human Resources and employee regarding any available alternatives

DBH Program Manager	• Review extension request for approval
	  ○ If concur, forward to Deputy Director for signature and approval
	  ○ If does not concur, return request to Supervisor indicating request denied

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Extension of Continued Employment, continued

Roles	Responsibilities
Deputy Director	• Review extension request for approval ○ If concur, forward to Director for signature and approval ○ If does not concur, return request to Program Manager indicating request denied
Director's Office	• Forward memo to DBH Compliance to confirm the following: ○ new registration number obtained or ○ renewal of existing registration, and ○ registration in good standing. • Approve or deny extension request
Office of Compliance	• Confirm information as indicated above • Issue memo to employee, supervisor and manager

Important Note: It is the responsibility of the pre-licensed clinical therapist to maintain a valid registration if an extension is being requested. While an extension is a privilege not a right, the therapist will not be able to render services nor report to work if the extension is granted, but fails to obtain a second registration with the BBS or renew existing registration.

Violations

Failure to obtain registration with the BBS within 60 days of employment may result in the termination of the therapist.

Providing services beyond the scope of the pre-licensed clinical therapist before the BBS registration is obtained may result in disallowances.

References

CA Welfare & Institutions Code, Section 5751.2(c)
CA Code of Regulations, Title 9, Sections 1810.254 and 1840.314(e)
Department of Mental Health (DMH) Letter No. 10-03, dated June 16, 2010

Related Policies

DBH Standard Practice Manual (SPM):

- HR4011: Waiver for Pre-Licensed/Out-of-State Licensed Ready Psychologists
- TRA8010: License Exam Prep Program Policy