Policy Title: 9006V.1 Non-Credentialed Clinician Notification and Supervision

Patient Age Group: (X) N/A ( ) All Ages ( ) Pediatric ( ) Adult

Purpose

The purpose of this policy is to ensure that clients of Centro Savila are informed when they are receiving treatment from a clinician who is not independently credentialed and is under supervision. Additionally, this policy establishes guidelines for the regular supervision of non-independently licensed or unlicensed staff who provide direct 1:1 treatment services to clients, ensuring that the supervision is documented and appropriate to the staff member's role and responsibilities.

Scope

This policy applies to all clients receiving behavioral health services at Centro Savila, as well as to all clinical staff, including those who are in the process of completing licensure requirements, those who are not independently licensed, or unlicensed staff who provide direct treatment services under supervision.

Policy Statement

Centro Savila is committed to providing high-quality care to its clients. Clients will be informed in writing and verbally if their clinician is not independently licensed or credentialed. Furthermore, non-independently licensed or unlicensed staff will be supervised regularly by an appropriately licensed clinician to ensure that services are provided in accordance with best practices and regulatory standards. Supervisory activities will be documented to ensure proper oversight and client safety.

Definitions

- **Non-Independently Licensed Clinician**: A clinician who holds a provisional, associate, or temporary license but does not yet have full independent licensure (e.g., Licensed Master Social Worker (LMSW), Licensed Professional Counselor (LPC) with associate license).
- **Unlicensed Clinician**: A clinician who does not hold any formal licensure or credentialing in the field of behavioral health, such as a case manager or behavioral health technician providing therapeutic or clinical services under supervision.
- **Direct 1:1 Supervision**: A formal process where an appropriately licensed clinician provides guidance, oversight, and review of the clinical work of non-independently licensed or unlicensed staff on a regular basis. This includes reviewing cases, treatment plans, and clinical documentation.
- **Credentialed**: A clinician who holds a full, independent license to practice in the field of behavioral health, such as Licensed Clinical Social Worker (LCSW), Licensed

Professional Counselor (LPC), or Licensed Marriage and Family Therapist (LMFT), among others.

Process for Informing Clients and Supervision of Non-Credentialed Clinicians

1. **Notification to Clients**
    - **Informed Consent**: As part of the intake process, clients will be informed that their clinician is not independently credentialed, if applicable. This information will be provided in the **Informed Consent** form, which will be reviewed and signed by the client at the beginning of treatment.
    - **Written Notification**: Clients will receive written notification that their clinician is either in the process of obtaining independent licensure or is unlicensed. This will include:
        - The clinician's current licensure status.
        - The clinician's supervisor, including their qualifications and contact information.
        - An explanation of the supervision process and its purpose.
    - **Verbal Notification**: Clinicians must also verbally inform clients during their first meeting about their licensure status and that they are receiving services under the supervision of a licensed clinician. The clinician must explain that regular supervision ensures high-quality treatment.
    - **Client Rights**: Clients will be provided with information about their right to request a change in clinician if they are uncomfortable with the situation.
2. **Supervision of Non-Independently Licensed or Unlicensed Clinicians**
    - **Regular Supervision**: Non-independently licensed or unlicensed clinicians providing direct 1:1 services to clients will receive **direct supervision** by an appropriate, independently licensed clinician on a **regular basis**.
        - Supervision will occur **weekly** or **bi-weekly** depending on the clinician's role, experience, and the complexity of the cases being handled.
    - **Supervising Clinician Requirements**: Supervising clinicians must meet the following criteria:
        - Hold an active and independent license in the relevant field (e.g., LCSW, LPC, LMFT, or psychologist).
        - Have at least **two years of post-licensure experience** in providing clinical services.
        - Possess expertise in the area of treatment the supervisee is providing (e.g., mental health, substance abuse, trauma-informed care, etc.).
    - **Types of Supervision**: Supervision will include the following:
        - **Case Review**: Regular review of the supervisee's case load, including client progress, treatment plans, and diagnostic assessments.
        - **Treatment Planning**: Supervision to ensure that the treatment plans created by non-credentialed clinicians are appropriate, evidence-based, and aligned with clients' needs.

        - **Feedback and Guidance**: Providing clinical feedback, mentoring, and guidance to ensure the supervisee develops the necessary skills and adheres to ethical and professional standards.
        - **Documentation Review**: Review of progress notes, treatment plans, and other clinical documentation to ensure compliance with regulatory requirements and quality standards.
    - **Supervision Format**: Supervision may occur in the following formats:
        - **Individual Supervision**: One-on-one supervision between the clinician and their supervisor.
        - **Group Supervision**: In cases where multiple non-licensed clinicians are being supervised, group supervision may be utilized.
        - **Direct Observation**: Supervisors may directly observe the clinician during client sessions (with client consent) for assessment and feedback purposes.
3. **Documentation of Supervision**
    - **Supervision Logs**: Supervisors will maintain a detailed **supervision log** for each non-independently licensed or unlicensed clinician, which will include:
        - Date and time of supervision session.
        - Topics discussed (e.g., case reviews, treatment planning, ethical issues).
        - Action items and follow-up tasks.
        - Observations or recommendations made during the supervision session.
    - **Client Records**: Documentation of the supervisor's review and approval of treatment plans, diagnostic assessments, and progress notes will be included in the client's clinical record to ensure transparency and accountability.
    - **Quality Assurance**: Supervisory documentation will be reviewed periodically by clinical management to ensure the supervision process is being followed and that client care is not compromised.
4. **Qualifications of Clinical Supervisors**
    - Supervisors of non-independently licensed or unlicensed clinicians must meet the following qualifications:
        - Hold a valid, independent license (LCSW, LPC, LMFT, or equivalent).
        - Have completed any required supervisory training or certifications as required by New Mexico state law or applicable professional bodies.
        - Be familiar with the standards of care, ethical guidelines, and regulations relevant to their supervisees' roles and client populations.
    - Supervisors will engage in continuous professional development to ensure that their supervision practices are informed by the most current standards in the field.
5. **Confidentiality and Ethical Standards**
    - Supervisors must maintain confidentiality regarding all aspects of the supervisee's cases, in compliance with HIPAA and other applicable regulations.
    - Supervisors must also ensure that their supervisees adhere to ethical standards, including boundaries, informed consent, and cultural competence.

Compliance with Laws and Regulations

Centro Savila ensures compliance with all relevant state and federal laws and regulations related to supervision, licensure, and client rights, including:

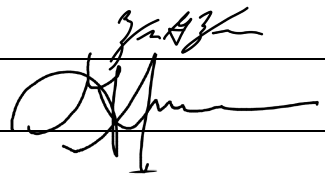
- **New Mexico Behavioral Health Services Regulations**: Adhering to state laws governing clinical supervision.
- **HIPAA Compliance**: Ensuring that all client information discussed during supervision remains confidential.
- **New Mexico State Licensing Requirements**: Ensuring that clinical supervisors meet the state's requirements for supervision and licensure.

Review and Revision

This policy will be reviewed annually by the HR Department and clinical leadership to ensure it aligns with best practices, legal requirements, and organizational goals. Updates and revisions will be communicated to all relevant staff and incorporated into training materials as necessary.

Approved by: William G. Wagner, Executive Director
Date: 11.12.24

Signature:

Item	*Date*	*Signature*
Executive Director	11/12/2024	
Deputy Director	11/12/2024	