

Clinical Supervision Plan Approval Criteria  
Staff Clarification - October 2012

It appears there has been confusion about whether LMSWs whose work settings do not meet the minimum requirements for clinical licensure by the Texas State Board of Social Worker Examiners (board) can still obtain supervised clinical experience and complete supervision requirements for LCSW while in those work settings.

To clarify:

- An LMSW in *almost any social work setting* may work towards LCSW licensure when under one or more board-approved Clinical Supervision Plans.
- The board ensures that each individual who receives an LCSW has demonstrated supervised experience in “advanced clinical skills in assessment, diagnosis, and treatment of mental, emotional, and behavioral disorders, conditions and addictions” because an LCSW may practice advanced clinical social work independently. The board must ensure that all LCSWs “are qualified and authorized to use the Diagnostic and Statistical Manual of Mental Disorders (DSM), the International Classification of Diseases (ICD), Current Procedural Technology (CPT) codes, and other diagnostic classification systems.” (Title 22, Texas Administrative Code (TAC), §781.202(f)).
- Work in a “non-clinical” setting may be approved and accepted by the board if performed in conjunction with social work experience that meets the board’s minimum requirements.
- If the LMSW’s primary work setting does not meet the board’s minimum requirements, the LMSW may engage in an additional four hours per week of work in a setting which does meet the minimum requirements. In this case, the LMSW would submit a supplemental Clinical Supervision Plan (Form III), attached to the Clinical Supervision Plan for the “non-clinical” work, and the LMSW may receive board approval upon review. Board approval is in writing and mailed to the LMSW.
- Social work experience towards licensure may be performed as a volunteer or for compensation.
- Please see the board’s law (Texas Occupations Code, Chapter 505) and rules (Title 22, Texas Administrative Code, Chapter 781), as well as Clinical Supervision Plan (Form III and Instructions) for more detailed information. These are available on the board’s website at: <http://www.dshs.state.tx.us/socialwork/>.

The State of Texas, in its legal regulation by the board, defines minimum competencies for independent clinical social work practice, among other things, for use in interdisciplinary practice, policy, and law. Most of these uses are specifically related to the formal provision of services, regulation, and credentialing of mental health services providers. Legal regulation generally must use shared terminology based on commonly accepted health care practices.

The profession of social work and its practitioners generally define and use the term “clinical social work” quite differently than the board does. Uses by the profession are generally more comprehensive and are not limited to lens of professional regulation. Social work practice, especially clinical practice, as defined by the profession, is generally not limited to a traditional mental health service delivery model. For some practitioners, clinical social work practice may specifically exclude or reject the use of a medical model for intervention. These contexts are different than that of the board.

#### Frequently Asked Questions about September 2012 Meetings:

(1) Is there a proposed rule or policy on the table or has there been a recent rule or policy change regarding the approval of Clinical Supervision Plans (Form III)?

No. There has not been a recent, substantial change to rule or policy; there is no active proposal to change rule or policy. The current board discussion of Clinical Supervision Plans is a direct result of the board’s commitment to using the best information available, including comments from the public and its licensees, to inform its decisions as it conducts business. Appropriate verification of the minimum requirements for clinical licensure have been considered and continually refined by the board throughout its history.

Minimum requirements for the purposes of legal regulation and credentialing are based on those described in the Association of Social Work Boards’ (ASWB) Model Social Work Practice Act, which is available at [http://www.aswb.org/pdfs/Model\\_law.pdf](http://www.aswb.org/pdfs/Model_law.pdf). Different activities of the board and its committees continually guide rule implementation.

As a direct result of interest in this important topic by members of the public, and at the instruction of the chair, the Licensing Standards and Qualification Committee (committee) of the Texas State Board of Social Worker Examiners (board) met on September 14, 2012, in Austin, and received public comments on the issue of approval of

Clinical Supervision Plans. The committee is continuing to accept written public comments on the subject and will continue to consider the issue.

- (2) Why didn't the Licensing Standards and Qualification Committee (committee) accept public comment on the approval of Clinical Supervision Plans prior to its discussion and action about specific licensing qualification cases? Why didn't the committee members respond to public comments at the meeting?

All committee and board meetings are conducted in accordance with the Texas Open Meetings Act. Meetings of a governmental body are generally not intended nor structured to allow for interactive dialogue with board or committee members. The purpose of the meetings is for the board to efficiently conduct its business in an open, public forum with structured public comments accepted under appropriate agenda items.

In general, the Licensing Standards and Qualification Committee reviews and acts upon individual appeals cases and requests prior to accepting any public comment. This is the committee's standard operating procedure. Individual applicants and licensees have pending, time-sensitive matters before the board, and many of them also attend and participate in the meetings. These cases are considered first, prior to public comment.

- (3) Did the committee or the board take action on this agenda item at the September 2012 meetings? Will the committee take action in the future on this item?

Neither the committee nor the full board took any formal action on the agenda item related to the approval of Clinical Supervision Plans at the September 2012 meetings. A board's discussion of and request for public input regarding a popular or controversial topic allows the board to effectively gather information for use in guiding its work. The committee and full board will determine whether a change is appropriate on this topic in the future.

The committee and board members are committed to thoughtful consideration of public comments and need time to ensure that the best information available guides the business of the board. The committee members are currently considering the information provided by the public; there is likely to be a similar agenda item on the December committee agenda.

Tentatively, the next committee meeting will be held on December 7, 2012, in the morning, at the Hobby Building, Room 100, Tower III, 333 Guadalupe, Austin, Texas. Consult final meeting agendas posted on the board's or the Secretary of State's websites approximately seven days prior to the meeting to confirm details.