



Registration and Licensure Requirements for Pre-Licensed Providers (ASW, AMFT, APCC) Policy

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Policy It is the policy of the Department of Behavioral Health (DBH) that DBH and Contracted Provider pre-licensed clinical therapists meet California (CA) Board of Behavioral Sciences (BBS) registration requirements, CA regulation requirements, and DBH standards regarding Registered Professionals *prior to* and throughout duration of employment.

Purpose To provide instruction for ensuring all pre-licensed clinical therapists meet licensing board registration requirements and DBH required timeframes within which pre-licensed clinical therapists must become licensed.

Applicable Disciplines This policy applies to pre-licensed clinical therapists seeking licensure who are registered with the BBS as either a Registered Associate Clinical Social Worker (ASW), Registered Associate Marriage and Family Therapist (AMFT) or Registered Associate Professional Clinical Counselor (APCC).
Pre-Licensed Psychologists and those licensed in states other than CA shall refer to DBH Waiver for Pre-Licensed/Out-of-State Licensed Ready Psychologists Policy (HR4011) for licensure and waiver requirements.

Note: The DBH Pre-licensed Clinical Therapist Trainee classification is not the same as Pre-licensed Clinical Therapist. Pre-licensed Clinical Therapist Trainees are providers who are not registered by the BBS and have one (1) year from employment to become BBS registered. At hire, this classification must complete the Trainee Statement of Awareness (HR025), has one year to become registered and will then be eligible for transition to the Pre-licensed Clinical Therapist classification.

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

Board Registration Requirement All pre-licensed clinical therapists who accept employment with DBH or a DBH Contracted Provider must be registered with the BBS *prior to* their start date, lack of valid registration status will delay the employment start date. Status as a Registered Professional is a requirement per Title 9 of the CA Code of Regulations §1810.254 and CA Welfare and Institutions Code §5751.2.

Continued on next page

Registration and Licensure Requirements for Pre-Licensed Providers (ASW, AMFT, APCC) Policy, Continued

Licensure Requirement

Pre-licensed clinical therapists employed by DBH or it's Contracted Providers must obtain licensure within six (6) years of the original issuance date of registration with the BBS. Failure to obtain licensure within six (6) years may result in termination.

For those pre-licensed clinical therapists employed by DBH or it's Contracted Providers who are meeting job expectations and actively pursuing licensure but will not have obtained licensure by the six (6) year deadline (past the original BBS registration date), extension may be requested and considered (see Extension of Continued Employment section of this policy).

Roles and Responsibilities

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

Note: Contracted providers must develop their own written process and may use the instructions in the table below as guidance.

Roles	Responsibilities
Hiring Program Manager/Supervisor or Designee	<ul style="list-style-type: none"> • Obtain current, and if applicable, previous BBS registration numbers from job application, obtain other names used by the candidate on the job application, and confirm validity; • Obtain registration information and confirm validity of registration with the Department of Consumer Affairs' (DCA) verification system; • Review/evaluate progress the candidate has made towards licensure to determine if a job offer can be made; <ul style="list-style-type: none"> ○ Verify, via application and Department of Consumer Affairs verification system (DCA), how many registration numbers candidate has had; ○ Review the number of years remaining of first registration, as candidates may not be eligible for an extension based upon original registration date; ○ Verify, via application if candidate has completed their first test for licensure; and ○ Request information on number of hours completed towards licensure, if already registered. • If candidate does not have BBS registration number, advise candidate registration is required before employment commences.

Continued on next page

Registration and Licensure Requirements for Pre-Licensed Providers (ASW, AMFT, APCC) Policy, Continued

Roles and Responsibilities
continued

Roles	Responsibilities
Payroll	<ul style="list-style-type: none"> • Collect BBS registration information; • Verify registration with the Department of Consumer Affairs' verification system; • Obtain completed Pre-Licensed AMFT/ASW/APCC Statement of Awareness of Need to Obtain Licensure for Employment (HR003) form from new employee/pre-licensed clinical therapist; <ul style="list-style-type: none"> ○ Send copy of Statement of Awareness of Need to Obtain Licensure for Employment to Hiring Manager/Supervisor ○ Send copy to DBH Compliance inbox: DBH-ComplianceProviderClearance@dbh.sbcounty.gov ○ Place copy in new employee County Personnel File ○ Provide the employee with a copy. • Maintain registration information in personnel file; • Notify Compliance (DBH-ComplianceProviderClearance@dbh.sbcounty.gov) and copy Human Resources Business Partner (HRBP) or designee when there is an out of state license-ready applicant.
Office of Compliance – Auditing and Monitoring	<ul style="list-style-type: none"> • Provide notice to Human Resources (HR) of identified pre-licensed staff whose registration is approaching expiration.
Human Resources	<ul style="list-style-type: none"> • Provide notice to identified pre-licensed staff whose registration is approaching expiration: <ul style="list-style-type: none"> ○ Send copy of notice to appropriate Supervisor and Program Manager, and copy applicable Deputy Director and Compliance – Auditing and Monitoring, • Notify applicable Deputy Director, Program Managers, HRBP and Compliance – Auditing and Monitoring if registration expires.

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Registration and Licensure Requirements for Pre-Licensed Providers (ASW, AMFT, APCC) Policy, Continued

Roles and Responsibilities
continued

Roles	Responsibilities
Pre-Licensed Clinical Therapist	<ul style="list-style-type: none"> • Obtain and maintain valid registration with BBS at all times, until licensed; • Ensure Staff Master is updated with accurate registration dates; • Provide immediate supervisor with updates regarding progress towards licensure during each evaluation period; • Inform immediate supervisor of any change in registration status, including becoming licensed; • Notify supervisor at least 45 days prior to six (6) year BBS registration expiration date, and • Notify DBH Payroll when licensure is obtained and update Staff Master with licensure and discipline updates.

Extension of Continued Employment

DBH acknowledges there may be extenuating circumstances for a pre-licensed clinical therapist preventing attainment of licensure within six (6) years from initial BBS registration. Therefore, the DBH Director (for DBH staff only, contract providers must identify an Executive within their agency and include in their written process) may consider, on a case-by-case basis, granting a one (1) year extension to an employee who has not obtained licensure within six (6) years from initial registration with BBS. An extension may be requested annually for one (1) year at a time - up to a maximum of three (3) years, provided the pre-licensed clinical therapist is meeting job expectations, is actively pursuing licensure, and is expected to obtain licensure within one (1) to three (3) years after the first BBS registration number expiration. Note, the maximum years allowed to attain licensure, past initial BBS registration, is nine (9) years from initial registration date.

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.
- Employee must have a combination of the following that shows licensure can be obtained within one (1) year after extension is granted:
 - 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 re-examination, and
 - A valid second registration number.

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Registration and Licensure Requirements for Pre-Licensed Providers (ASW, AMFT, APCC) Policy, Continued

Extension of Continued Employment, continued

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

Note: Contracted providers must develop their own written process and may use the instructions below as guidance, ensuring to identify the Executive within their agency responsible for final extension approval.

Roles	Responsibilities
Employee requesting extension	<ul style="list-style-type: none"> • Generate a request for extension memo to immediate supervisor at least 45 days prior to the six (6) year BBS registration expiration; • Provide documentation showing a passing score of the BBS California Law and Ethics Exam; • Indicate on the memo and attach proof of progress towards becoming licensed.
Supervisor	<ul style="list-style-type: none"> • Review extension request, and if in agreement, generate a request for extension that provides justification for the extension including details related to the aforementioned bullets and most current WPE showing employee is meeting job performance standards; • Forward extension request to applicable Program Manager for review and approval, and • If disagree with extension request, work with Program Manager, Human Resources, and employee regarding available alternatives.
Program Manager	<ul style="list-style-type: none"> • Review extension request for approval <ul style="list-style-type: none"> ○ If concur, forward to Deputy Director for signature and approval; ○ If do not concur, return request to Supervisor indicating request is denied.
Deputy Director	<ul style="list-style-type: none"> • Review extension request for approval: <ul style="list-style-type: none"> ○ If concur, forward to Compliance – Auditing and Monitoring: DBH-ComplianceProviderClearance@dbh.sbcounty.gov for review; If do not concur, return request to Program Manager indicating request is denied.
Office of Compliance – Auditing and Monitoring	<ul style="list-style-type: none"> • Review extension request for approval; • Complete approval memo and packet for Director review and approval; • Route to Director’s Office, and • Issue memo with Director’s signature to employee, copying Supervisor, Program Manager, Director and HR regarding approval or denial.

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Registration and Licensure Requirements for Pre-Licensed Providers (ASW, AMFT, APCC) Policy, Continued

Extension of Continued Employment, continued

Roles	Responsibilities
Director's Office	<ul style="list-style-type: none"> • Approve or deny extension request; Forward signed memo (if approved) or denial to Compliance – Auditing and Monitoring: DBH-ComplianceProviderClearance@dbh.sbcounty.gov • Contract providers: submit a copy of the approved extension letter to the DBH Office of Compliance at DBHComplianceStaffMaster@dbh.sbcounty.gov.

Important Note: It is the responsibility of the pre-licensed clinical therapist to maintain a valid registration at all times. Consideration for an extension is a privilege not a right; the requesting employee will not be able to render services nor report to work if the extension is granted, but current registration status is not maintained.

Related Policies and Procedures

- [DBH Standard Practice Manual and Departmental Forms:](#)
- Clinical Supervision for Licensure AMFT, ASW, APCC (CLP0806)
 - Waiver for Pre-Licensed/Out-of-State Licensed Ready Psychologists (HR4011)
 - License Exam Prep Program Policy (TRA8010)

References

- [CA Welfare and Institutions Code, § 5751.2\(c\)](#)
- [CA Code of Regulations, Title 9, § 1810.254 and §1840.314\(e\)](#)
- Department of Consumer Affairs' verification system: <https://search.dca.ca.gov/>
- Board of Behavioral Sciences: <https://www.bbs.ca.gov/>